

TOWNSHIP AND REGION COMMENTS  
 1940 Wrigley Road, North Dumfries  
 Plan of Subdivision (30T-20301) and Zoning By-law Amendment (ZC-01/20)  
 January 2024

*Region of Waterloo (Zoning By-law Amendment) – May 30, 2023*

<i>Comment</i>	<i>Response</i>
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<b>Draft Zoning By-Law Text</b>	
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<p>Regional Staff have reviewed the revised Zoning By-Law Text for the proposed development at 1940 Wrigley Road.</p> <p>Regional Staff acknowledge that the owner/applicant has included language to regulate the provision of secondary dwelling units within the single detached or street townhouse dwellings. This is permitted as per Planning Act regulation 299/19 which came into force on September 3, 2019 to facilitate implementation of the changes to the Planning Act made by Schedule 12 of the More Homes, More Choices Act, 2019. The regulation defined additional residential policies as per subsection 16(3) of the Planning Act. The regulation permits the use of two residential units in a detached house, semi-detached house or rowhouse and the use of a residential unit in a building or structure ancillary to a detached house, semi-detached house or rowhouse. Regional staff acknowledge implementation of these units are addressed through the subdivision application.</p> <p>Previous Regional comments also required a prohibition on geothermal wells or energy systems on the subject lands. This has not been included in the revised zoning text. Therefore the following must be included:</p> <ol style="list-style-type: none"> <li>1. <i>A portion of the subject lands fall within the two-year time of travel to the nearest municipal supply wells. Regional Staff require that the Zoning By-Law Amendment include a provision that prohibits the use of geothermal wells or geothermal energy systems on the subject lands.</i></li> </ol>	<p>Noted. The zoning by-law text has been revised to include a prohibition on the use of geothermal well or geothermal energy systems.</p>
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<b>Record of Site Condition</b>	
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<p>As per the Region’s Implementation Guidelines for the Review of Development Applications on or Adjacent to Known and Potentially Contaminated, Regional staff require a Record of Site Condition (RSC) for the subject lands. As per the Region’s Implementation Guideline the RSC and Ministry Acknowledgement Letter is required prior to final approval of ZC-01-20 through a Holding Provision.</p>	<p>This requirement will be addressed through a condition of draft plan approval.</p>
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<b>Removal of Aggregate License</b>	
<p>The proposed Zoning By-Law Amendment is to rezone the lands from Aggregate to the appropriate residential designations. The subject lands are currently licensed under the Aggregate Resource Act (ARA License No. 158570). The subject lands are currently vacant and have been filled and graded as part of the rehabilitation of the extraction operation in anticipation of the future residential development.</p> <p>The owner/applicant is proposing that the license be rescinded prior to final registration of the subdivision and be anchored as a condition of draft approval. Regional Staff have no concerns with this approach.</p>	<p>This requirement will be addressed through a condition of draft plan approval.</p>
<b>Summary</b>	
<p>Regional Staff has no objections to the proposed Zoning By-law Amendment application ZC-01/20, subject to the following:</p> <ol style="list-style-type: none"> <li>1) The inclusion of the required clause in the draft zoning by-law text requiring a prohibition on geothermal wells and geothermal energy systems.</li> <li>2) The inclusion of a Holding Provision in the site-specific zoning by-law requiring the completion of a Record of Site Condition and Ministry Acknowledgement for the subject lands, to the satisfaction of the Region of Waterloo.</li> </ol>	<p>Noted. Prohibitions for geothermal heating has been added to the draft zoning by-law text.</p> <p>The requirement for a RSC will be addressed through a condition of draft plan approval.</p>
<i>Region of Waterloo (Draft Plan of Subdivision) – May 30, 2023</i>	
<i>Comment</i>	<i>Response</i>
<b>Record of Site Condition</b>	
<p>As per the Region’s Implementation Guidelines for the Review of Development Applications on or Adjacent to Known and Potentially Contaminated, Regional staff require a Record of Site Condition (RSC) for the subject lands. The owner/applicant has proposed that the RSC be satisfied as a condition of final approval on the subdivision 30T-20301.</p> <p>However, Regional Staff note that the Implementation Guideline states that where a draft plan of subdivision is accompanied by a zoning by-law amendment, completion of a RSC is required prior to final approval of the zoning by-law amendment with use of holding provisions. As such, Regional staff require that the RSC is to remain as a Holding Provision on the accompanying ZC-01-20.</p>	<p>This requirement will be addressed through a condition of draft plan approval.</p>

### Removal of Aggregate License

The proposed Zoning By-Law Amendment is to rezone the lands from Aggregate to the appropriate residential designations. The subject lands are currently licensed under the Aggregate Resource Act (ARA License No. 158570). The subject lands are currently vacant and have been filled and graded as part of the rehabilitation of the extraction operation in anticipation of the future residential development.

The owner/applicant is proposing that the license be rescinded prior to final registration of the subdivision and be anchored as a condition of draft approval. Regional Staff have no concerns with this approach.

Noted. Township/Region to include condition of draft approval to require that aggregate license to be rescinded prior to registration.

### Density Calculation

The subject lands are designated "Township Designated Greenfield Area" in the Regional Official Plan (ROP). Regional Staff note that Regional Official Plan Amendment No.6 as approved by MMAH on April 11, 2023.

Policy 2.G.1.2 specifies that 'new development taking place in designated greenfield areas will be planned, designated, zoned and designed...' to accommodate a number of items including meeting or exceeding the minimum density targets set out in Table 4 as shown below and as per Policy 2.G.1.3 'will be calculated over the entire designated greenfield area of the Region and each respective area municipality.'

The revised draft plan provides a minimum density of 57.9 residents and jobs per hectare, and a maximum density of 61.7 residents and jobs per hectare, which still exceeds the minimum density requirements of 51 residents and jobs combined per hectare for the Township of North Dumfries.

**Table 4**  
**Minimum Density Targets for Designated Greenfield Areas by Area Municipality**

Area Municipality	Minimum Density Target*
Cambridge	59
Kitchener	65
North Dumfries	51
Waterloo	54
Wellesley	48
Wilmot	43
Woolwich	53
Waterloo Region	59

\* Density measured in residents and jobs combined per gross hectare of land.

<p>The owner/applicant has provided revised density calculations based on the revised draft plan submission. Regional Staff confirm that the minimum residents and jobs combined per hectare is 63.8 and the maximum residents and jobs combined per hectare is 73.8. This exceeds the requirements minimum density requirement of 51 residents and jobs combined per hectare for the Township of North Dumfries and therefore Regional Staff have no further concerns.</p>	
<p><b>Housing</b></p>	
<p><u>General</u></p> <p>The following Regional policies and initiatives support the development and maintenance of affordable housing:</p> <ul style="list-style-type: none"> <li>• Regional Strategic Plan <ul style="list-style-type: none"> <li>○ Objective 4.2 requires the Region to make affordable housing more available to individuals and families.</li> </ul> </li> <li>• 10-Year Housing and Homelessness Plan <ul style="list-style-type: none"> <li>○ contains an affordable housing target which is that 30% of all new residential development between 2019 and 2041 in Waterloo Region is to be affordable to low and moderate income households.</li> </ul> </li> <li>• Building Better Futures Framework <ul style="list-style-type: none"> <li>○ shows how the Region plans to create 2,500 units of housing affordable to people with low to moderate incomes by 2025.</li> </ul> </li> <li>• Region of Waterloo Official Plan <ul style="list-style-type: none"> <li>○ Section 3.A (Range and Mix of Housing) contains land use policies that ensure the provision of a full and diverse range and mix of permanent housing that is safe, affordable, of adequate size, and meets the accessibility requirements of all residents.</li> </ul> </li> </ul> <p>The Region supports the provision of a full range of housing options, including affordable housing. Should this plan of subdivision move forward, staff recommend that the applicant consider providing a number of affordable housing units on the site, as defined in the Regional Official Plan. Rent levels and house prices that are considered affordable according to the Regional Official Plan are provided below in the section on affordability.</p> <p>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.</p>	<p>The draft plan of subdivision achieves the requirement of Policy 3.A.5 of the Regional Official Plan and provides for the provision of more than 30% of new residential units being planned for in forms other than single and semi-detached units.</p> <p>The proposed townhouse unit type is inherently more affordable than single and semi-detached units and will provide a housing option that is more affordable to future purchasers.</p>

Staff further recommend meeting with Housing Services to discuss the proposal in more detail and to explore opportunities for partnerships or programs and mechanisms to support a defined level of affordability.

As noted in previous comments. Policy 3.A.5 in the Regional Official Plan applies to this site. It states:

*"Where a development application proposing residential uses is submitted for a site containing two hectares or more of developable land, the Region and Area Municipalities will require, wherever appropriate, a minimum of 30 per cent of new residential units to be planned in forms other than single-detached and semi-detached units, such as town homes and multi-unit residential buildings."*

A review of the proposed unit types in the Planning Justification Report indicates that this proposal adheres to Policy 3.A.5. Regional Staff have no further concerns on this matter.

Affordability

For the purposes of evaluating the affordability of an ownership unit, based on the definition in the Regional Official Plan, the purchase price is compared to the least expensive of:

Housing for which the purchase price results in annual accommodation costs which do not exceed 30 percent of gross annual household income for low and moderate income households	\$385,500
Housing for which the purchase price is at least 10 percent below the average purchase price of a resale unit in the regional market area	\$576,347

\*Based on the most recent information available from the PPS Housing Tables (2021).

In order for an owned unit to be deemed affordable, the maximum affordable house price is \$385,500.

For the purposes of evaluating the affordability of a rental unit, based on the definition of affordable housing in the Regional Official Plan, the average rent is compared to the least expensive of:

Noted.

A unit for which the rent does not exceed 30 per cent of the gross annual household income for low and moderate income renter households	\$1,470
A unit for which the rent is at or below the average market rent (AMR) in the regional market area	Bachelor: \$950 1-Bedroom: \$1,134 2-Bedroom: \$1,356 3-Bedroom: \$1,538 4+ Bedroom: \$3,997

\*Based on the most recent information available from the PPS Housing Tables (2021)

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.

Please do not hesitate to contact me directly by email at [JMaanMiedema@regionofwaterloo.ca](mailto:JMaanMiedema@regionofwaterloo.ca) or by phone at 226-753-9593 should you have any questions or wish to discuss in more detail.

**Land Use Compatibility**

Regional Staff acknowledge that the proposed development originally consisted of the future redevelopment of Block 102 as a Stacked Townhouse Condominium with 28 units proposed.

The revised draft Plan (January 27, 2023) identifies this as Block 20 and 21. These blocks are proposed to be developed with townhouses or a future vacant land condominium block. The proposed zoning by-law does include site specific regulations for these blocks to permit the cluster/stacked/non-street fronting townhouses and walk up apartment dwellings with regulations for maximum building height and building setbacks and landscape buffers to ensure compatibility with the surrounding residential neighbourhood.

Regional Staff have no concerns with the proposed use for these blocks and indicate that items including land use compatibility (i.e. noise) would be further assessed for these blocks through a future development application (i.e. site plan and/or plan of condominium). A condition of final approval will be required to enter into a registered development agreement on title, to require the completion of a detailed noise study for these blocks prior to site plan approval.

Noted. Revised draft plan still includes former multiple residential Block 21 (now Block 19). Block 20 on the January 27<sup>th</sup>, 2023 plan has been relocated to an internal block within the subdivision (now Block 18) to address comments from Township staff and the public regarding land use compatibility.

Water Services	
<p>Regional Staff have reviewed the Functional Servicing Report prepared by WalterFedy dated February 28, 2023 and provide the following comments:</p> <ol style="list-style-type: none"> <li>1) The proposed development requires that one run of the existing sanitary sewer collection system will be required to be lowered in order to collect the flows from the proposed development. The applicant will be required to complete a detailed design and cost estimate of the off-site works for review and approval from Region Water Services and Transportation staff review and approval. It is anticipated that the off-site capital work will be required to be completed through a Regional Transportation Capital project. More information will be required prior to approval in principle.</li> <li>2) Section 6.5 summarizes the results from the modeling completed for the proposed development. This section incorrectly concludes that the existing system can support the proposed fire flow demands. Specifically, upon review of the fire flow calculations, the maximum required fire flow is 200 L/s for Block 10. Based on the EPA Net model results in Appendix C, when the design flow of 204 L/s is applied to node H6 (Block 10) the pressures in the system fall below the acceptable lower limit of 140 kPa (14 m). Therefore, the proposed development cannot be supplied with appropriate fire protection. The fire flow deficiency must be addressed through modifications to the block sizes, building dimensions, and/or design criteria in the building construction (fire walls, distance separations, etc.)</li> </ol> <p>In conclusion, the Functional Servicing Report does not adequately show that the proposed development can be supported by the existing infrastructure. Modifications to the either the proposed infrastructure or building properties must be considered and the Functional Servicing Report must be resubmitted.</p> <p>Regional Staff acknowledge that the owner/applicant has been working to addresses these issues with Water Services Staff.</p>	<p>Updated Functional Servicing Report prepared by WalterFedy is included with this resubmission.</p>
Hydrogeology and Source Water Protection	
<p>Regional Staff reviewed the technical materials submitted in support of the proposed development and have no further objections/concerns.</p> <p>The owner/applicant shall enter an agreement to complete Salt Management Plans for all commercial and multi-use residential uses prior to site plan approval. This will be included as a condition of draft approval for the plan of subdivision.</p>	<p>Noted. The preparation of a Salt Management Plan for any multi-residential block shall be included as a condition of draft approval for the plan of subdivision.</p>

<p>Regional Staff also note that the submitted hydrogeological study did not include a dewatering assessment as the proposed basement elevations are not below the water table. In the circumstances that construction is proposed to go below the water table, Regional Staff would require an updated hydrogeological study to be completed for review. This is a result of a high water table with strong artesian pressure in Ayr which can cause issues with dewatering and geothermal systems.</p>	<p>Requirement for preparation of an updated Hydrogeological Study for construction that is proposed below the water table to be included as a condition of draft approval, if applicable.</p>
<p><b>Environmental Planning</b></p>	
<p>Regional Planning Staff accept the opinion provided by Aboud &amp; Associates Inc. (letter to Nitin Jain, March 8, 2023) that the findings of the previous version of the Environmental Impact Statement (14300 MD Landco Subdivision Scoped Environmental Impact Study (R1), Aboud &amp; Associates Inc., August 11, 2021, the "EIS") remains relevant to the revised Plan of Subdivision.</p> <p>Regional Staff are further satisfied that the recommendations of the EIS are applicable to the revised plan of subdivision based on the subdivision design and accompanying technical reports, and have no further concerns related to the Draft Plan of Subdivision, subject to the inclusion of the following conditions of draft approval:</p>	<p>Noted. Recommended conditions to be included as conditions of draft approval for the plan of subdivision.</p>
<p>1) That prior to any clearing of vegetation on the site, or final approval of all or any part of this plan of subdivision (whichever occurs first), the owner enter into an agreement with the Regional Municipality of Waterloo, that no clearing of vegetation, grading or site preparation will occur within the active season for turtles (May 1 – October 15). Further, the agreement will specify that if any work takes place during the active season (May 1 – October 15), silt fencing shall be installed in advance of any clearing or grading activities to contribute to ensuring turtle exclusion, with the location and height of silt fencing to be as specified in an approved Erosion and Sediment Control plan, consistent with the recommendations of the Scoped Environmental Impact Study (14300 Nd Landco Subdivision) prepared by Aboud &amp; Associates Inc. (August 11, 2021) in order to limit turtle access to the subject lands;</p>	<p>Condition of draft approval for the plan of subdivision to be addressed prior to registration.</p>
<p>2) That prior to any clearing of vegetation on the site, or final approval of all or any part of this plan of subdivision (whichever occurs first), the owner enter into an agreement with the Regional Municipality of Waterloo agreeing to conduct an active turtle nest survey immediately prior to any site disturbance or alteration which will occur within the turtle Core Nesting Period;</p>	<p>Condition of draft approval for the plan of subdivision to be addressed prior to registration.</p>
<p>3) That prior to final approval the owner enters into an agreement to install permanent fencing, which may include a low rock wall, along the west and north edge of the limits of the plan of subdivision in accordance with the recommendation of the Scoped Environmental Impact</p>	<p>Condition of draft approval for the plan of subdivision to be addressed prior to registration.</p>



<p>Study (14300 Nd Landco Subdivision) prepared by Aboud &amp; Associates Inc. (August 11, 2021). The rock wall may be a low wall (approximately 30cm in height) installed to limit turtle access to the subject lands while not affecting other wildlife;</p>	
<p>4) That prior to any clearing of vegetation on the site, or final approval of all or any part of this plan of subdivision (whichever occurs first), the owner enter into an agreement with the Regional Municipality of Waterloo, that no clearing of vegetation on the site occur during the bird breeding season (April 1 – August 31) in compliance with the Migratory Birds Convention Act unless it can be ascertained by a qualified expert that no birds covered by the Act are observed to be breeding in or adjacent to the affected area;</p>	<p>Condition of draft approval for the plan of subdivision to be addressed prior to registration.</p>
<p>5) That prior to any land clearing, grading or other site alteration, the owner ensure compliance with the Endangered Species Act.</p>	<p>Condition of draft approval for the plan of subdivision to be addressed prior to registration.</p>
<p>6) That, prior to registration, the owner submit a detailed stormwater management plan and a detailed erosion and sediment control plan to the satisfaction of the Regional Municipality of Waterloo and the Township of North Dumfries, in consultation with the Grand River Conservation Authority.</p>	<p>Condition of draft approval for the plan of subdivision to be addressed prior to registration.</p>
<p>7) That prior to final approval the owner enters into an agreement to implement an approved erosion and sediment control plan, including installation and monitoring of a silt and sediment control barrier prior to any work, with the silt fencing to be inspected weekly during construction, and within 24 hours following a storm event of 25mm within a 24 hour period, and to agree to maintain all Erosion and Sediment Control measures and keep them in place until construction has been completed and all disturbed soils have been revegetated.</p>	<p>Condition of draft approval for the plan of subdivision to be addressed prior to registration.</p>
<p>8) That, prior to registration, the owner submit landscaping and planting plans for all buffer areas and peripheral areas of the Plan of Subdivision that are identified for enhancement, specifically the area adjacent to Core Environmental Features (Provincially Significant Wetland), and that recommended plantings shall consist of locally-appropriate, self-sustaining native vegetation to the satisfaction of the Regional Municipality of Waterloo and the Township of North Dumfries, in consultation with the Grand River Conservation Authority.</p>	<p>Condition of draft approval for the plan of subdivision to be addressed prior to registration.</p>
<p>9) That, prior to registration, the owner develop a brochure or other similar information tools for new home purchasers and residents which provides information about the natural heritage features contiguous to the subdivision, along with advice about how they can be good neighbours to and stewards of these areas, and that the brochure be to the satisfaction of the Regional Municipality of Waterloo and the Township of North Dumfries, in consultation with the Grand River Conservation Authority.</p>	<p>Condition of draft approval for the plan of subdivision to be addressed prior to registration.</p>

<p>10) That prior to final approval, the owner enters into an agreement to ensure that any lighting within Blocks 3, 20 and 21 be installed so as not to shine into the adjacent lands outside of the limits of the Plan of Subdivision.</p>	<p>Condition of draft approval for the plan of subdivision to be addressed prior to registration.</p>
<p><b>It is also recommended that the Township enter into an agreement to require the completion of a Tree Protection Plan, as recommended in the EIS, and to ensure the installation of Tree Protection Fencing if impacts to existing trees are anticipated.</b></p>	<p>Condition of draft approval for the plan of subdivision to be addressed prior to registration.</p>
<p><b>Stormwater Management and Site Grading</b></p>	
<p>Regional Staff have reviewed the reports entitled "Stormwater Management Report, 2825618 Ontario Inc, 1940 Wrigley Road, Township of North Dumfries" and "Functional Servicing Report, 2825618 Ontario Inc., 1940 Wrigley Road, Township of North Dumfries", both prepared by Walter Fedy and dated February 28, 2023.</p> <p>Regional Staff have no concerns with the provided studies and have no further comments.</p>	<p>Noted.</p>
<p><b>Regional Road Dedication</b></p>	
<p>At the proposed intersections of Regional Road #49 (Scott Street/Wrigley Road) and Street A, 25 foot (7.62 metre x 7.62 metre) daylight triangles will be required.</p> <p>The land must be dedicated to the Region of Waterloo for road allowance purposes and must be dedicated without cost and free of encumbrance. All land dedications should be identified on the draft plan.</p> <p>The owner/applicant must engage an OLS to prepare a draft reference plan which illustrates the required road allowance widenings. Prior to registering the reference plan, the OLS should submit a draft copy of the plan to Regional Staff for review. Further instructions will be provided with regards to document preparation and registration.</p>	<p>Daylight triangles to be dedicated to the Region of Waterloo are proposed at both legs where Street A meets Regional Road #49 (Scott Street/Wrigley Road) and are shown on the draft plan of subdivision.</p> <p>Requirement for preparation of draft reference plan and dedication of daylight triangles to the Region of Waterloo to be included as a condition of draft approval for the registration of the draft plan of subdivision.</p>
<p><b>Access Permits</b></p>	
<p>Regional Access Permits will be required for the proposed accesses of Street A to Wrigley Road. The proposed accesses must comply with the Regional Access Policy. The fee for the issuance of the permit is \$230.00 each (total \$460.00).</p> <p>The application for Access Permits can be found on the Region's website at:  <a href="https://forms.regionofwaterloo.ca/ePay/PDLS-Online-Payment-Forms/Commercial-Access-Permit-Application">https://forms.regionofwaterloo.ca/ePay/PDLS-Online-Payment-Forms/Commercial-Access-Permit-Application</a></p>	<p>Noted. Regional Access Permits to be applied for prior to registration of draft plan of subdivision.</p>
<p><b>Transportation Impact Study</b></p>	

<p>Regional Staff have received and are reviewing the report entitled "1940 Wrigley Road, Ayr, Transportation Impact Study", authored by Paradigm Transportation Solutions Limited (February 2023) and will provide comments under separate cover.</p> <p>Regional Staff support the proposed pedestrian refuge island on the west leg of the intersection of Scott Street and Hilltop Drive/Street A. Prior to Regional clearance an approved functional design and cost estimate will be required for the proposed pedestrian refuge island. This may be secured through a condition of draft approval.</p> <p>There is a \$500.00 fee outstanding for the review of the TIS and will be required prior to Regional approval of the study.</p>	<p>Please refer to response letter from Paradigm (dated November 8, 2023) and included with this resubmission for responses to comments related to the TIS.</p> <p>Requirement for approved functional design and cost estimate for proposed pedestrian refuge island to be included as condition of draft approval for the registration of the draft plan of subdivision.</p>
<b>Environmental Noise</b>	
<p>Regional Staff have reviewed the report entitled Noise Compatibility Study, Proposed Residential Development, ND Landco Ayr, part of Lot 33, Concession 8, Ayr, Ontario, prepared by HGC Engineering (April 2019) and provide the following comments regarding transportation noise.</p> <p>The report indicates that the primary source of noise is road traffic on Wrigley Road/Scott Street (Regional Road #49). The report indicates that the acoustical impacts are above acceptable levels at the units along Wrigley Road and Scott Street and mitigation, including warning clauses and the provision for future installation of central air conditioning are required to ensure indoor noise levels do not exceed acceptable levels in NPC-300 and NPC-216.</p> <p>The report indicates that dwelling units closest to Wrigley Road will require the provision for the future installation of air conditioning. The location, installation and sound ratings of the air conditioning devices should comply with NPC-300.</p> <p>The report notes that the requirements of the Ontario Building Code (OBC) will provide adequate sound insulation for all dwelling units in the development.</p> <p>The report indicates that the predicted sound level in the Outdoor Living Areas (OLA) closest to Wrigley Road will be in excess of the Ministry of the Environment, Conservation and Parks (MECP) limit and a noise warning clause will be required. The predicted sound level in the remaining OLA's will be acceptable and a noise warning clause will not be required.</p>	<p>Recommended noise mitigation measures (air conditioning) and warning clauses as identified in the Noise Compatibility Study dated April 2019 will be provided for as part of building design and identified in offers of purchase and sale. This will be secured through a condition of draft approval that will require that the owner enter into an agreement with the Region of Waterloo for the noise warning clauses to be included in agreements of Offers of Purchase and Sale, lease/rental agreements and condominium declarations.</p> <p>The proposed dwellings will be constructed in accordance with the requirements of the OBC, and will provide adequate sound insulation for all dwelling units.</p> <p>Requirement for the installation of a maximum 1.5 metres-high maintenance free chain link fence shall be included as a condition of draft approval for the plan of subdivision.</p>

Regional Staff note that a maximum 1.5-metre-high maintenance free chain link fence will be required to be installed 0.15 metres onto the Wrigley Road and Scott Street road allowance.

Given that the noise sources, Wrigley Road and Scott Street are roadways under the jurisdiction of the Region of Waterloo, an agreement to implement the recommendations of the noise study will be required. The report recommends the following noise warning clauses be registered on title for dwelling units 1 through 9.

As a condition of draft approval, the owner will be required to enter into an agreement with the Region of Waterloo and that the following clause(s) be included in agreements of Offers of Purchase and Sale, lease/rental agreements and condominium declarations.

**Dwelling Units 1-9:**

- a) *"Purchasers/tenants are advised that, despite the inclusion of noise control features in the development and within the building units, sound levels due to increasing road traffic may on occasions interfere with some activities of the dwelling occupants as the sound levels exceed the sound level limits of the Municipality and the Ministry of the Environment, Conservation and Parks."*
- b) *"This dwelling has been with the provision for adding central air conditioning at the occupant's discretion. Installation of central air conditioning by the occupant in low and medium density developments will allow windows and exterior doors to remain closed, thereby ensuring that the indoor sound levels are within the sound level limits of the Municipality and the Ministry of the Environment, Conservation and Parks."*

Regional Staff note that an acoustical engineer will be required to certify that the building plans include all required noise control measures, including the provision for the installation of air conditioning prior to issuance of a building permit. An acoustical engineer will also be required to certify that all required noise control measures, including of air conditioning has been installed.

**Noise Implementation:**

Regional Staff acknowledge, as consistent with the 2019 noise study (April 2019) completed for the original submission for the subject lands that acknowledges the potential of a future aggregate operation on the adjacent lands. Therefore, as per the study recommendations the owner/applicant will be required to enter into a development agreement, registered on title, to include the following

The preparation of an addendum to the previous Noise Study shall be included as a condition of draft approval for the plan of subdivision.

<p>noise warning clause in all agreements of purchase and sale, lease, condo declarations and/or tenancy agreements:</p> <p><i>i. "Purchasers are advised that the lands to the east are designated for future aggregate extraction and due to the proximity of that future use, sound levels from aggregate extraction operations may at times be audible."</i></p> <p>Regional Staff acknowledge that the noise study references the lot configuration associated with the original submission. The owner/applicant is required to provide an addendum to the previous noise study to reflect the revised Draft Plan, Block and Lot Numbers.</p>	
<p><b>Additional Residential Units</b></p>	
<p>Regional Staff acknowledge that the owner/applicant has included language to regulate the provision of secondary dwelling units within the single detached or street townhouse dwellings in the draft zoning by-law. This is permitted as per Planning Act regulation 299/19 which came into force on September 3, 2019 to facilitate implementation of the changes to the Planning Act made by Schedule 12 of the More Homes, More Choices Act, 2019. The regulation defined additional residential policies as per subsection 16(3) of the Planning Act. The regulation permits the use of two residential units in a detached house, semi-detached house or rowhouse and the use of a residential unit in a building or structure ancillary to a detached house, semi-detached house or rowhouse. Regional staff acknowledge implementation of these units are addressed through the subdivision application.</p> <p>The Region will require the following language be captured in a development agreement, registered on title, with the Region of Waterloo regarding servicing for any additional residential unit on the subject lands. The Region is responsible for the provision of water servicing in the Township of North Dumfries:</p> <p><i>a. That any additional residential unit is serviced with water and sanitary services to the satisfaction of the Region and Township. It is to be demonstrated that the use can be accommodated within the capacity of the water and sanitary sewage system and where site conditions are suitable for the long term provision of such services;</i></p> <p><i>b. That any additional residential unit obtains water services from the primary dwelling and that there shall only be one water meter per property.</i></p>	<p>Noted. Requirement for the owner to enter into a development agreement with the Region of Waterloo to be included as a condition of draft approval for the registration of the draft plan of subdivision.</p> <p>The development agreement is to include the recommended wording to address servicing requirements for additional residential units, which can be included in offers of purchase and sale.</p>

<b>Summary</b>	
<p>The owner/applicant is advised that receipt of these post circulation comments does not constitute a draft or final approval of this application. Prior to draft approval of the subdivision by the Region, the Township of Wilmot must provide formal comments on the application and/or a recommendation in support of draft plan approval, including the Township's conditions of draft approval.</p> <p>Further, prior to draft approval of the plan of subdivision, 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 Planning Act.</p>	<p>Noted. Hard copies of the draft plan of subdivision to be provided to the Region for draft approval once Region confirms all comments have been addressed, or can be addressed through conditions of draft approval.</p>
<i>Township of North Dumfries – Zoning and Plan of Subdivision – October 5, 2023</i>	
<i>Comment</i>	<i>Response</i>
<b>Plan of Subdivision/Zoning By-law Amendment</b>	
<p>1. In general terms, the road / lot layout and the unit mix involving condominium townhouse development is an improvement over the previous submission.</p>	<p>Acknowledged.</p>
<p>2. Township Staff are supportive of two full movement intersections into the subdivision via Scott Street. The westerly leg of Street 'A' shall be aligned with Hilltop Drive to ensure no turning movement conflicts. Intersection design will be a Condition to Draft Plan Approval.</p>	<p>Noted.</p>
<p>3. Park Block 22 and its general location / configuration within the Plan of Subdivision is acceptable. The final design of the underground infiltration galleries and clearances to adjacent lots / play structures, etc will ultimately determine the Park Block size. The design of the underground infrastructure associated with the Park Block will be determined through a Condition to Draft Plan Approval.</p>	<p>Noted.</p>
<p>4. The site lines to the west of the westerly leg of the intersection of Street A at Scott Street are acknowledged by the Study Consultant as deficient in recognition of the existing ridge situated to the rear of Lot 10 and the residential property located at 102 Scott Street that extends into the Regional Road Allowance. The establishment of the westerly leg of Street A as an emergency access driveway as an interim measure is not appropriate.</p> <p>In the event that construction of the west leg of Street A intersection is constructed prior to the Region of Waterloo reconstructing Scott Street, then a Condition of Draft Plan Approval will be established that will articulate that the minimum site lines will be established before</p>	<p>Noted. WalterFedy has confirmed that the site lines to the west of the westerly leg of Street A can be designed be made adequate.</p>

<p>the intersection is commissioned and the design / construction details / financing will be to the satisfaction of the Region.</p>	
<p>5. The Township supports the proposed traffic calming measures internal to the subdivision along Street 'A'. The details and standards will be reflected as Conditions to Draft Plan Approval and design standards within the Subdivision Agreement</p>	<p>Noted.</p>
<p>6. On-street parking will only be permitted on one side of the street. This will be established as a Condition to Draft Plan Approval and the provision of an on-street parking plan as a schedule to a future Subdivision Agreement.</p>	<p>Noted.</p>
<p>7. Sidewalks internal to the plan of subdivision, unless it is a short block to provide access to a side street or a Park Block, shall only be constructed on one side of the road. The municipal standard for sidewalks is 1.5 metres in width. The sidewalk shall be constructed on the side of the road where Lots with a minimum width of 11 metres are present. Lots with a lot width smaller than 11 metres will be established on the opposite side of the road to where the sidewalk is proposed. This design facilitates the ability to accommodate tandem parking on the smaller lots within the driveway.</p>	<p>Sidewalk design to be addressed at detailed design and prior to registration of the Plan of Subdivision.</p>
<p>8. A sidewalk shall be constructed within the Regional Road Allowance [Scott Street] extending from Trail Block 23 westerly through to Street A west leg and the proposed pedestrian crossing location of Scott Street. The Region's standard for a sidewalk is 1.8 metres in width. This item will be reflected as a Condition to Draft Plan Approval.</p>	<p>Noted.</p>
<p>9. Walkway / Trail Blocks shall be a minimum width of 6 metres, with a concrete or asphalt surface a minimum of 2 metres in width. Trail Block 23 (where it shifts southerly down the slope of the former gravel pit) and Walkway Blocks 24 and 25 may need to be wider in width in recognition of the side slope. Accommodation will be required to recognize the slope transition of the walkway surface suitable for pedestrian access / AODA compliant; overland drainage; and, the appropriate transition / taper of the modified grade into the flanking residential lots. This item will be reflected as a Condition to Draft Plan Approval.</p>	<p>Noted. Walkway/Trail Blocks in the revised draft plan of subdivision (November 16, 2023) have been updated to be a minimum of 6.0 metres wide throughout the trail connections.</p>
<p>10. Block 20 is a challenge to develop for residential purposes. To assist in the functional design of this parcel, it may be advisable to abandon Trail Block 23 in its alignment along the east and north boundaries of Block 20. To provide connectivity, an alternative would be to establish a new Walkway Block adjacent the south perimeter of Block 20 to bring access to the street and a sidewalk connection along the street frontage through to Walkway Block 24.</p>	<p>The alignment of the Trail Block 23 along the north and east boundaries of the former Block 20 has been abandoned in the updated draft plan. The overall trail (Block 21 and 22) will be connected by the proposed municipal sidewalk on the outer edge of Street A between Walkway Blocks 23 and 24.</p>

	The former multiple residential Block 20 has been relocated to an internal block (now Block 18) to address the comments received.
11. Block 21 and the location of the future condominium driveway (north leg) shall be aligned with the centreline of Street B so as to avoid turning movement conflicts.	The north leg for the condominium driveway of former Block 21 (now Block 19) is aligned with the centreline of Street B.
12. All intersections of local to local streets shall be designed with a 5 m x 5 m daylighting triangle.	Noted.
13. A 0.3 metre reserve shall be required along the Scott Drive frontage of Lot 10, Block 11, Block 19, and, Block 1	A 0.3 metre reserve is provided for all residential blocks along the entirety of the Scott Street frontage (Blocks 1, 11, 17 and Lot 10).
14. All single detached dwelling lots shall have a minimum lot width of 11 metres and a minimum lot area of 330 sq.metres. All on-street townhouse dwelling units shall have a minimum lot width of 6 metres and a minimum lot area of 180 sq.metres.	The zoning regulations for on-street townhouse dwellings have been revised as requested. The zoning regulations for all single detached lots with the exception of those in Zone Z.4d(iv) have been revised to require a minimum lot width of 11 metres and a minimum lot area of 330 sq. metres.  The proposed zoning provisions for Zone Z.4d(iv) are intended to provide additional flexibility and variety to the design of the single detached units within the overall subdivision.
15. The Township will consider a front yard setback of 4.5 metres for the residence or the unenclosed porch / stair risers, provided that the garage is setback a minimum of 7 metres from the front lot line.	Noted. Zoning by-law text has been updated to include recommended front yard setback and garage setbacks.
16. Single detached dwellings shall have a maximum building height of 10 metres. Townhouse dwelling units shall have a maximum height of 12 metres. Stacked townhouse dwelling units shall have a maximum height of 14 metres.	Noted. Zoning by-law text has been updated to include recommended building height maximums.
17. Single detached dwellings shall have a minimum interior side yard width of 1.2 metres. Where a storm sewer lateral is present to provide connection from a rear yard catchbasin to the street, the minimum side yard for each flanking lot will be 1.5 metres in width. An easement will be required for the catchbasin, rear yard swale and the storm sewer lateral.	The proposed minimum interior side yard is 0.6/1.2 m, which will achieve a minimum distance of 1.8 between single detached dwellings.
18. Townhouse dwelling units (stacked & townhouse, either on-street or in a condominium) will accommodate a 0 metre interior side yard along the common wall, and, 3 metres between	Noted. Zoning by-law text has been updated to include these side yard setback requirements.



townhouse blocks.	
<p>19. Minimum rear yard of 7.5 metres with a deck (greater than 0.6 metres above grade) will be permitted to extend 3 metres into rear yard setback.</p> <p>For the Lots / Blocks that back onto Block 23, in recognition of the grade / slope transition, a modified definition of rear yard setback will be established. The rear yard setback will be from the rear elevation of the dwelling to the toe of the slope.</p> <p>Modified standards for the construction of ancillary or accessory buildings / structures in the rear yard of Lots / Blocks that back Block 23 will be established in recognition of the grade / slope of the proposed Lot. There will be an easement (1.5 m) to recognize the rear yard swale at the toe of the slope that will extend to a rear yard catchbasin. The accessory building / structure will be setback a minimum of 1 metre from the easement to allow access to maintain the swale / catchbasin.</p>	Noted. To be addressed during detailed design.
<p>20. Accessory Dwelling Units (within the principle dwelling or as dwelling unit within an accessory structure) will be permitted in accordance with provisions of the Planning Act (s.35.1(1)) and the recent MMAH decision on ROPA 6 to permit up to three residential units in a detached house, semi-detached house or row house (or up to two residential units and an ancillary detached residential unit. These general provisions will be included in the Zoning By-law Amendment.</p>	Noted. Provisions for ADU's included in the draft zoning by-law text.
<p>21. Block 11 shall not be rear loaded onto Scott Street. To accommodate the proposed development of Block 11, a Lot depth of a minimum of 40 metres will be required. The Township proposes the following to be incorporated into the Zoning By-law Amendment:</p> <p>Lot Frontage (minimum) 11 m</p> <p>Front Yard Setback – Scott Street (minimum) 4.5 m with an encroachment of up to 2 m for an unenclosed porch and/or stair risers</p> <p>Rear Yard – Dwelling to Detached Garage (minimum) 7 metres</p> <p>Setback of Detached Garage to Street C 7.5 m</p> <p>Detached Garage can have a 0 lot line with common wall</p>	Lots within Block 11 have been designed to be facing onto Scott Street, with vehicular access from the rear along Street C. The draft zoning by-law text has been revised to include the recommended site specific regulations.

<p>with the detached garage on the abutting Lot</p> <p>A parking pad adjacent the detached garage is permitted with a minimum length of 6.5 m and a width of 3 m</p>	
<p>22. The minimum provision for off-street parking for all single detached and on-street townhouses shall be 2 spaces per dwelling unit.</p>	<p>Noted. This is existing parking standard and the draft zoning by-law text reflects this requirement.</p>
<p>23. Confirmation required as to the proposed Condominium ownership (ie: vacant land condominium, etc) so that appropriate terminology and setbacks for zoning can be established.</p>	<p>To be determined – will depend on market conditions.</p>
<p>24. For Blocks 20 and 21, consideration for alternate off-street parking provisions will be entertained. For another recent development comprised of condominium scale townhouse / stacked townhouse dwelling units in Ayr, the following provisions were accepted by Council:</p> <p>If surface parking is proposed Minimum of 1 allocated space per dwelling unit</p> <p>Minimum Parking provisions 1.25 parking spaces for studio or 1 bedroom dwelling units</p> <p>2 parking spaces for each 2 bedroom or greater dwelling unit</p> <p>1 parking space for every three dwelling units that are comprised of 2 bedroom or greater dwelling unit for the purposes of visitor parking</p> <p>1 parking space for every five dwelling units comprised of 1 bedroom or studio dwelling units for visitor parking</p> <p>Surface Parking – parking stall (minimum) 2.75 m x 5.5 m</p> <p>Surface Parking – Barrier Free Stall Type A: 3.4 m to accommodate vans with built-in side entry wheelchair lifts x 5.5 m</p> <p>Surface Parking – Barrier Free Stall Type B: 3.0 m x 5.5 m A 1.5 m wide access aisle must be provided for every Barrier Free space but can be shared with adjacent Barrier Free spaces</p>	<p>Proposed parking regulations for cluster townhouse and stacked townhouse units is unchanged.</p> <p>Parking spaces will be required to comply with existing zoning requirements for parking stall dimensions.</p>

<p>If driveway is proposed for the dwelling unit 2 parking spaces per dwelling unit, and, 1 car park stall (common area) for each 3 dwelling units for visitor parking</p>	
<p>25. Definition for Stacked Townhouse Dwelling</p> <p>Presently Stacked Townhouse Dwellings are not established in General Zoning By-law 689-83. A definition has been utilized on a site specific basis in another condominium style development in Ayr as follows:  <i>Stacked Townhouse Building means a residential building containing four (4) or more Dwelling Units which are horizontally and vertically separated in a split level or stacked manner, where each Dwelling Unit has an independent entrance from the outside (no egress to a common corridor) accessed through the front elevation or exterior side elevation of the Dwelling Unit.</i></p>	<p>Noted. Recommended definition of “Stacked Townhouse Dwelling” added to revised draft zoning by-law text.</p>
<p>26. To recognize development on a private (condominium) road, new provisions are required on a site specific basis to recognize this aspect as provisions do not exist in General Zoning Bylaw 689-83. A similar development approved in Ayr utilized provisions as set out below:</p> <p>Additional Uses to include Residential Dwelling(s) on a Private Internal Condominium Road:</p> <p>For the purposes of this By-law, a Residential Dwelling(s) on a Private Internal Condominium Road shall mean a cluster of dwelling units containing four or more units in number, each of which has access to a Public Highway from a private internal condominium road.</p>	<p>Noted. Recommended definition of “Residential Dwelling(s) on a Private Internal Condominium Road” added to revised draft zoning by-law text.</p>
<p>27. Setbacks to the property perimeters for Blocks 20 &amp; 21 will be created for building setbacks and parking areas to the adjacent Lots / Blocks within the Plan. Further work required in this regard.</p>	<p>Site specific zoning regulations for Block 19 continues to include minimum building setback from southerly lot line of 15.0 metres.</p>
<p>28. The Township has Conditions to Draft Plan Approval and as a Condition to the Release of the Holding (-h) Symbol on the Zoning By-law Amendment will require the following:</p> <ul style="list-style-type: none"> <li>a. Release of Aggregate License No. 15857 by the Ministry of Natural Resources &amp; Forestry; and,</li> <li>b. Submission to and the acceptance by the Region of Waterloo, the Township and the Ministry of Environment, Conservation &amp; Parks on a Record of Site Condition completed in accordance with O.Reg 153/04</li> </ul>	<p>These requirements will be addressed through conditions of draft plan approval.</p>
<p><b>Functional Servicing Report</b></p>	
<p>Where applicable, Conditions to Draft Plan Approval will be established to implement items</p>	

summarized below or elements to be reflected in detailed design drawings included in the Subdivision Agreement.	
29. The report references the TIS. All comments in regards to the TIS are included below.	Noted.
30. Catchment area 603 shows drainage onto adjacent property. Drainage onto neighbouring properties is not permitted, all flows must be contained within the site.	The pre-development catchment area plan has been updated to reflect minor drainage flowing onto adjacent property to the north under existing conditions. Post-development catchment area will capture flows within the site with the exception of small minor flows draining onto neighboring property, comparable to pre-development conditions.
31. The number of units does not appear to match the proposed draft plan. Servicing numbers will need to be revised to ensure they are referencing the same number of units/population.	Number of units have been updated in FSR.
32. There does not appear to be sufficient rear yard usable space in several locations (Blocks 1, 2, 11 and 21).  There should be a minimum of 6 m of rear yard with 2-4% slope	Lots have been updated to have a 6 meter rear yard with a 2-4% slope.
33. There does not appear to be sufficient space/blocks to bring the rear yard drainage to the road on Block 1 and potentially Block 2 and 11.  There should be a maximum of 6 townhouse units draining to each rear lot catchbasin. Where single detached lots are proposed, no more than 3 lots should drain to a rear lot catchbasin. All rear lot CBs and leads shall be in easement blocks in favour of the Township.	Noted. Blocks 1 and 2 have back-to-front drainage, therefore, no rear lot CBs will be needed.
34. A small portion is designed to flow uncontrolled to Jedburgh pond. There are not easements in place to permit this uncontrolled drainage.	The pre-development catchment area plan has been updated to reflect drainage flowing onto adjacent property under existing conditions. Post-development catchment area will capture flows within the site with the exception of small minor flows draining onto neighboring property, comparable to pre-development conditions.
35. Ponding is only permitted between the curb lines. Ponding is not permitted on boulevards including driveway aprons. Ponding depth shall not exceed 0.15 m.	Noted. Grading plan has been revised to control ponding between curb lines and under 0.15m ponding.

<p>36. Report states "Under major storm events up to the 100-year design storm event, runoff unable to be conveyed through the storm sewer system will be directed to the infiltration gallery by overland flow through the streets within the subdivision."</p> <p>Provide details as to how the overland flow will enter the infiltration gallery.</p>	<p>Storm sewers within the greater subdivision will be design per standard design for up to and including the 5-year storm event (minor storms). Flows from major storm events that exceed the capacity of standard catchbasins will be conveyed within the roadway between the curbs. Along the frontage of the propose park block, at the low point of the site, surface structures have been designed for total capture of major storm events upto and including the 100-year storm event. Specifically double catchbasins with side inlets are being utilized. Supporting calculations for the total capture have been included in the appendix of the updated SWM Report. In a worst case event, where all structures designed to capture flow are blocked, the site has been graded such that flows from the site will overflow onto Wrigley Road. Please note that overflow to Wrigley Road is an extreme case and not expected in storm events up to and including the 100-year storm event. Storm sewers from the total capture structures to the infiltration gallery will be sized for the 100-year flows.</p>
<p>37. The storm sewers appear to be significantly undersized throughout the development. Ponding is not permitted during the 5 year storm. Provide confirmation of sufficient pipe sizing.</p>	<p>Ponding is not expected in the design storms presented. We have identified maximum ponding limits on the grading plans to illustrate maximum ponding in the event there is blockage in structures. Once the maximum ponding limits are reached, drainage will spill downstream, ultimately to Wrigley Road (assuming all structures are blocked). As noted above, storm sewers upstream of total capture structures will be sized for the standard 5-year storm event. Storm sewers downstream of the total capture structure to the infiltration gallery will be sized for the 100-year</p>

	storm event. Sizing of the storm sewer pipes throughout the site will be confirmed at detailed design.
<b>SWM Report</b>	
38. Catchment area 603 is designed to flow uncontrolled to Jedburgh pond. There are not easements in place to permit this uncontrolled drainage.	The pre-development catchment area plan has been updated to reflect drainage flowing onto adjacent property under existing conditions. Post-development catchment area will capture flows within the site with the exception of small minor flows draining onto neighboring property, comparable to pre-development conditions.
39. There does not appear to be any controls for sedimentation reduction prior to entry into the galleries on the trail block	There are no galleries on the trail block in the proposed design.
40. Additional information, drawings and a maintenance plan will be required at the time of detailed design to address protection of the infiltration gallery during the dwelling unit construction phase of the development.	Additional information has been added to the SWM report and further information will be provided during detailed design.
41. Report to include commentary on the impacts of two significant (100 year storms) storms within a 2 day period. There does not appear to be an overland flow route should the gallery be full and another significant event occurs.	As noted above, the site has been designed such that if all structures are blocked and/or the infiltration gallery is full, overland flow will be conveyed and spill to Wrigley Road with a maximum ponding depth of 0.15m. SWM report has been updated to address this.
<b>Geotechnical Report</b>	
42. Bore hole locations are in an isolated area of the site and may not reflect the overall geotechnical conditions of the entire site.	Per the geotechnical reports provided for this site, the site has various types of fill material placed over the native material. The most recent geotechnical investigation by DST was completed specifically to confirm the depths and type of native material that the infiltration gallery would be in contact with.
43. It appears that this is being used to supplement a prior geotechnical report. Both reports should be referenced to provide coverage for the site.	Prior Geotechnical studies that were completed and that formed part of previous submissions by others have been referenced in the Functional Servicing Report.

<b>Hydrogeological Report</b>	
44. The recommendations of the report shall be incorporated into the detailed design and Draft Plan Approval conditions.	Acknowledged.
<b>Scoped EIS</b>	
45. The recommendations of the report shall be incorporated into the detailed design and Draft Plan Approval conditions.	Acknowledged.
<b>Transportation Impact Study</b>	
46. Provide confirmation that pavement marking modifications are not required or provide commentary on the modifications required.	Please refer to response letter from Paradigm (dated November 8, 2023).
47. A pedestrian / cycling analysis has not been completed. This information is required and must be completed prior to the issuance of Draft Plan Approval. Active Transportation must be included in the Transportation Impact Study as it will potentially inform the Conditions to Draft Plan Approval.	Please refer to response letter from Paradigm (dated November 8, 2023).
48. An internal review of the traffic controls is required and shall provide recommendations for the required internal traffic controls (ie: stop controls; regulatory signage, pavement markings, etc).	Please refer to response letter from Paradigm (dated November 8, 2023).
49. Traffic counts indicate they were collected over the course of one day. It is recommended traffic counts be collected over the course of a week to better indicate daily volumes.	Please refer to response letter from Paradigm (dated November 8, 2023).
50. The recommendations speak to the need to remove sight line deficiencies. The recommendation indicates that it could be used as an emergency access. This is not desirable. If this is the case, the report shall articulate two complete and distinct scenarios. The impact of lack of sight lines for pedestrians has not been explored.  The TIS speaks to the removal of the sight line constraints at the proposed intersection. Adequate information has not been provided to address this constraint. An interim solution is required as Regional work is subject to future budget deliberations and there is no assurance that the work will be undertaken in advance of construction.	Please refer to response letter from Paradigm (dated November 8, 2023).
51. Note, one of the turning movements will have a Level of Service of D.	Please refer to response letter from Paradigm (dated November 8, 2023).
52. The Township will be liaising directly with the Region of Waterloo concerning the speed limits of Wrigley Road approaching Scott Street. At present the speed limit is 80 km/hr and drops to 50 km/hr at the settlement boundary. In recognition of the transition / grade of Scott Street and the two intersections of Street A onto Scott Street and the future pedestrian	Please refer to response letter from Paradigm (dated November 8, 2023).

<p>/ cycling crossing, Township Staff remain concerned about visibility and speed of the motoring public along this stretch of road. The appropriate stepped reduction of speed is required on Wrigley Road along with enhanced signage.</p>	
<p><i>GRCA – Zoning and Plan of Subdivision – April 5, 2023</i></p>	
<p><i>Comment</i></p>	<p><i>Response</i></p>
<p><b>Resource Planning/Water Resources Engineering Comments</b></p>	
<p>1. According to our mapping, Riverine Erosion Hazards exist along the northwest boundary of the property. Slopes in this location are quite steep and range from 3:1 to 2:1 down to Cedar Creek/Jedburgh Pond. Development lots are proposed along the northwest boundary of the development with no setbacks applied from the top of slope. Has a slope stability assessment been completed to demonstrate that the properties can be safely situated at the top of the Riverine Erosion Hazard? Please clearly show the top of slope and GRCA regulation limit on all engineering drawings. The GRCA regulation limit will be as per Section 8.2 of GRCA Policies for the Administration of the Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Regulation (Ontario Regulation 150/06). If the applicant can provide sufficient documentation to prove that the steep slopes northwest of site are human-made, then we would not regulate those slopes. Otherwise, it will be treated as steep valley slopes and our setbacks/regulation limits will apply.</p>	<p>Englobe has completed a review northwest boundary of the development. It is confirmed that the steeper slopes are human-made as part of the previous gravel pit operations. Englobe has delineated the top of slope and a 15m development setback as shown on the Grading Plans. Proposed residential dwellings are proposed outside of the identified 15m setback. Further scoped review for proposed grading work within the setback can be reviewed as needed.</p>
<p>2. The pre-development drainage area delineation does not appear to follow the top of slope along the northwest boundary of the site, as well as some locations along the eastern boundary of the site. Please review and edit the drainage delineation as needed. Please also show the external contours to the east of site to illustrate the extent of the external drainage area. The external contours to the northeast of site appear to also drain down into the property. Revise hydrologic calculations as needed.</p>	<p>Pre-development catchment areas have been delineated based on available lidar information. Updated pre-development and post-development catchment areas have been provided (Figure 3 and 4 respectively).</p>
<p>3. Please demonstrate that post-development flows will be maintained to pre-development levels with respect to proposed uncontrolled runoff to Jedburgh Pond.</p>	<p>The post-development areas draining north are less than under pre-development conditions and consist of pervious surfaces. As such, post-development flows are less than pre-development.</p>
<p>4. Will the Regional Storm be safely conveyed through the right-of-ways of the subdivision to Wrigley Road/Scott Street without impacting and/or encroaching the residential properties? Please include a hydraulic calculation (using a program such as Flowmaster or a Manning's calculation) of the cross section of the road to demonstrate that the Regional Storm can be safely conveyed through to Wrigley Road/Scott Street.</p>	<p>The servicing for the site has been designed such that major flows up to and including the 100-year storm flows will be conveyed to the infiltration gallery within the park block via Total Capture catchbasin structures with side inlets. Supporting calculations for these inlet structures have been</p>



	<p>included in the updated SWM report. Further, the grading of the roads have been updated per Township comments to have a maximum ponding depth of 0.15m. The maximum ponding depth should only be observed in the event of blockages to the Total Capture catchbasin structures. In an extreme event where there are blockages and ponding capacity is exceeded, the site is designed such that flows exceeding the 0.15m depth will spill to Wrigley Road.</p>
<p>5. Please include the Regional storm event in the post- and pre-development discharge rates (Table 2 and Table 5) and include discussion within the report regarding how Regional flows will be safely conveyed.</p>	<p>The SWM report has been updated.</p>
<p>6. The following subwatershed studies exist for the area:</p> <ul style="list-style-type: none"> <li>o Cedar Creek Scoped Subwatershed Study (Phase 1), February 2022; and,</li> <li>o Upper Cedar Creek Scoped Subwatershed Study, October 2019.</li> </ul> <p>Please confirm if these studies have been reviewed and comment on whether the requirements of these studies have been met with respect to the proposed works.</p>	<p>Confirmed.</p>
<p>The following comments will be required to be addressed at detailed design and future permitting:</p> <p>7. Please include material stockpile locations on the erosion and sediment control (ESC) plans.</p> <p>8. Please include locations of interceptor swales and coir log check dams on the ESC plans.</p> <p>9. Section 10 of the Functional Servicing Report specifies that silt fencing installed around the perimeter of the site and at the base of all stockpiles will be as per OPSD 219.130 (heavy-duty silt fencing). Section 8 of the SWM report specifies that silt fences will be as per OPSD 219.110 (light duty silt fencing). Drawing C7-1 specifies light duty silt fencing to be used. Will a combination of both be utilized during construction? Please clarify this discrepancy and update ESC plans as required.</p> <p>10. Drawing C7-1 indicates that a mud mat is proposed at an entrance to the site along Wrigley Road. Is this the only entrance that will be used during construction? Please confirm.</p>	<p>Acknowledged.</p> <p>These will be conditions of draft approval associated with GRCA conditions and clearance.</p>

11. Please provide updated ESC plans, stamped and signed by a qualified professional engineer.	
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