

IP Park Phase 2 - 3rd Full Submission

(Responses to 2nd Submission Comments)

#	Full Comment	Responses
GRCA		
Resource Planning Comments		
1	<p>In addition to reviewing this revised draft plan, the applicants have requested the GRCA's review and support of the location and design of the proposed stormwater management (SWM) pond currently shown on Block 7. Prior to a recommendation of draft plan approval, it is our understanding that this request is to advance approvals with the Ministry of the Environment, Conservation and Parks (MECP) and to support the future construction of the north-south road (Intermarket Road). Not only are the applicants proposing to grade and construct the SWM pond well within the 30 m buffer of the Upper Freeport Creek Provincially Significant Wetland (PSW), the plan also shows the SWM pond berm immediately adjacent to the PSW. This is not consistent with the approved East Side Lands Stage 1 Master Environmental Servicing Plan (MESP) nor the City of Cambridge's North Cambridge Business Park official plan and zoning by-law amendments affecting these lands. The applicant's argument is that there was a precedent established in the Phase 1 lands. However, the example they sight is not a PSW and the SWM pond berm is not located adjacent to the wetland area. The GRCA may consider minor grading at the edge of the buffer but this proposal is not acceptable and cannot be supported. Please also note that a permit from the GRCA would also be required for the construction of the SWM pond under Ontario Regulation 150/06. The applicants will need to revise the SWM pond block and design accordingly.</p>	<p>EXP Response: The pond has been relocated to be wholly outside the buffer</p>
2	<p>It is not clear on the draft plan where the limits of Block 7 (SWM) and Block 9 (Open Space) are located. Please note that the floodplain limits are not to be located within the development blocks, including Block 7. Please clarify.</p>	<p>EXP Response: 30m buffer now Blk 7/9 boundary. Boundary updated with updated Hec-Ras model provided by the city</p>

3	In addition to Block 7, portions of Business Park blocks (Block 3 and Block 6) are located within the 30 m of the PSW. This is not consistent with the MESP and/or the North Cambridge Business Park official plan/zoning by-law approvals and is not supportable. Please revise the draft plan.	EXP Response: Updated Draft plan accomodating this is reflected on EXP Plans
Water Resources Engineering Comments		
4	The latest road crossing design reviewed by the GRCA had a regulatory flood elevation of 304.1 m. Please confirm with the City of Cambridge and revise the location of the flood line and lot lines on the drawings.	EXP Response: Updated Floodline provided by City. Plans have been updated to reflect this.
5	The unitary peak flow rates should be determined by subtracting the flow from uncontrolled areas from the pre-development peak flow and dividing the result by the pre-development area. Please revise.	EXP Response: Unitary peak flow rates have only been applied to the flow entering Pond 130 and this area has no uncontrolled flow
6	Section 4.7.1 of the SWM report states that 'The oil/grit separator unit will be sized using the ETV particle size distribution. Each oil/grit separator (ogs) unit will be sized to meet the MOE long term 80% TSS removal criteria.' Please be more specific on the type of oil grit separator (ogs) that is being proposed. Will a filter type ogs be required?	EXP Response: See SWM Report new section 4.7.3 regarding detailed design of these OGS units will be determined at the Block design stage ie, Site Plan Approval Stage. Each oil/grit separator will be sized using the ETV particle size distribution and meet as minimum MOE 80% TSS removal criteria. It is noted each OGS will be a filter type unit.
7	Section 4.7.1.1 of the SWM report states that 'bioswales within each individual block will be sized to accommodate the 25 mm storm and released over a period of minimum 24 hrs'. The lot grading, bioswale locations, and servicing does not support the conveyance of the 25 mm storm from the parking areas to the bioswale. Please clarify.	EXP Response: See SWM Report new section 4.7.3.1 Lot grading, bioswale locations, and servicing for individual blocks will be addressed at the SPA stage of each block.
8	Section 4.7.1.2 of the SWM report states that 'detailed sizing of the infiltration gallery of each block will be addressed during the detailed design with Ministry of the Environment (MOE/MOECC/MECP) percolation rate of 15 mm/hr when the building footprint is defined'. The MOECC issued an interpretation bulletin in 2015 that indicates while 15 mm/hr is a good lower limit when relying on infiltration for water quantity control; it should not be interpreted as a prohibition when trying to achieve a water balance. The footprint of the infiltration galleries will need to account for soil infiltration rates and maximum drawdown time. Please revise the report wording.	EXP Response: See SWM Report new section 4.7.3.2 to incorporate revised wording in the report

9	Section 4.9 of the SWM report – Table 4-17 shows flow from Blocks 1-4 at a higher value (1.939 cms plus minor flow) than the target flow rate for the 100 year storm shown in Table 4- 11 (1.617 cms). Please explain.	<p>EXP Response:</p> <p>Table 4-11 shows the post development flow from the subject site, as per the control provided by the Stormwater Management Pond. Table 4-18 (Table 4-17 in last report) is a summary of the overland flow conveyed by Intermarket Rd, upstream of the pond. As the pond provides the main stormwater management control for the site , it expected that the flows upstream of the pond (Table 4-18) would be greater than the flows downstream of the pond (Table 4-11)</p>
10	Appendix J of the hydrogeological report – The post development spreadsheet, catchment 102, has an infiltration factor of 0.7. This appears to be an error. Please correct and update the water balance results.	<p>EXP Response:</p> <p>Acknowledged. Error corrected in water balance spreadsheet, included as attachment to HydroG memo to be included in complete submission</p>
Natural Heritage Comments		
11	The proposed development setbacks discussed in Section 7.3 of the Environmental Impact Study (EIS) report are somewhat difficult to interpret and do not appear to be consistent with the buffer recommendations outlined in the Freeport Creek and Tributary to the Grand Subwatershed Study. According to this plan, a 30 m development setback is required to protect the PSW. No development, including but not limited to SWM facilities and grading, should occur within the 30 m prescribed buffer zone.	<p>EXP Response:</p> <p>Pond design has been modified to accommodate this comment.</p> <p>NRSI Response (Refer to attached letter): Has been addressed by NRSI in June 5 2020 letter, which has been approved by GRCA</p>

12	<p>The creation of a 3:1 or a 4:1 slope immediately adjacent to the wetland is not supported, as this would further alter drainage patterns and related ecological functions within this area. The agricultural activity evident within the outer fringes of the PSW suggest a need for ecological restoration and enhancement within this area. Therefore, minor grading for the strict purpose of ecological restoration or enhancement of the 30 m wetland buffer zone would be acceptable.</p>	<p>EXP Response: Pond design has been modified to accommodate this comment.</p> <p>NRSI Response (Refer to attached letter): Has been addressed by NRSI in June 5 2020 letter, which has been approved by GRCA</p>
13	<p>The construction of a retaining wall within the 30 m wetland buffer zone would not be consistent with the goals and objectives of the Freeport Creek and Tributary to the Grand Subwatershed Study and is not supported.</p>	<p>EXP Response: Noted; any and all retaining walls are outside the buffer</p> <p>NRSI Response (Refer to attached letter): Has been addressed by NRSI in June 5 2020 letter, which has been approved by GRCA</p>
14	<p>With respect to mitigation measures outlined in Section 8.2, we request that machinery maintenance and fueling occur no closer than 30 m from any wetland or watercourse.</p>	<p>NRSI Response (refer to attached letter): NRSI Response: Acknowledged and agreed. Section 8.2 of the Submission 2 EIS (February 13, 2020) states: <i>“Machinery maintenance and fueling is to occur at designated locations away from the PSW and Freeport Creek; machinery fueling will not occur within 15m of a watercourse, regardless of development limits.”</i> The following text replaces this statement: <i>“Machinery maintenance and fueling is to occur at designated locations a minimum of 30m from the PSW and Freeport Creek, regardless of development limits.”</i></p>

15	With respect to the <i>site grading plan (Drawing SG-01)</i> and <i>site servicing plan (Drawing SS-02)</i> appended to the SWM Report, the 30 m wetland setback limit is mislabelled. We request that these drawings be revised and recirculated to all review agencies.	EXP Response: All Plans to be recirculated. Conformance is included on plans now.
16	The submission of a full set of site and grading plans at an appropriate scale (e.g. 1:1000) is required.	EXP Response: Grading and Servicing plans are at 1:1000 scale
17	According to the water balance analysis, annual post development surface runoff volume toward Freeport Creek will be 67-70% of predevelopment volumes. Notwithstanding the fact that the subject lands represent 15% of the total catchment area of the Upper Freeport Creek PSW, the creek and wetland are largely sustained by surface water. Will the anticipated surface water reduction also represent a negligible impact to the hydrologic function of the creek and wetland? Further assessment of anticipated impacts is requested.	EXP Response: Please refer to Hydrogeological Comment Response memo NRSI Response (Refer to attached letter): Has been addressed by NRSI in June 5 2020 letter, which has been approved by GRCA
18	A monthly water balance analysis and/or pre to post wetland hydrographs is required in order to better assess hydrologic impacts on aquatic and wetland communities.	EXP Response: A monthly water balance calculation has been included in the Hydrogeological response memo included with this submission. NRSI Response (Refer to attached letter): Has been addressed by NRSI in June 5 2020 letter, which has been approved by GRCA NRSI Response (Refer to attached letter): Has been addressed by NRSI in June 5 2020 letter, which has been approved by GRCA

19	A detailed erosion and sediment control plan is required.	EXP Response (refer to attached letter): ESC plans provided with this submission NRSI Response: Section 8.2 of the Submission 2 EIS (February 13, 2020) recommends that a detailed Erosion and Sediment Control Plan (ESCP) be developed prior to construction activities, and provides high-level recommendations for the development of this plan. The ESCP will be prepared by the project team and submitted at the detailed design stage.
20	A detailed landscaping plan for the SWM block and wetland buffer zones is required.	NRSI Response (Refer to attached letter): Has been addressed by NRSI in June 5 2020 letter, which has been approved by GRCA

21	Recommended: A pre, during, and post construction monitoring plan is recommended in order to assess the effectiveness of proposed mitigation measures and to implement contingencies as needed.	<p>EXP Response: An updated monitoring plan is included with this submission</p> <p>NRSI Response (Refer to attached letter): Section 8.3 of the Submission 2 EIS (February 13, 2020) provides high-level recommendations for the pre-, during- and post-construction monitoring plan. Monitoring of the PSW buffer to the south of the development is anticipated to be completed by others, since all development in this area is associated with the construction of Intermarket Road (which has been transferred to the City) and the SWM Pond (which is to be transferred via Draft Plan of Subdivision). A monitoring program for the Significant Woodland adjacent to the development is recommended, and can be prepared at the detailed design stage.</p>
Conclusion		
	Based on the foregoing, the GRCA requires the above comments to be adequately addressed prior to providing a recommendation for approval of this draft plan. We would further recommend that the applicants provide a response letter that outlines how GRCA's comments have been addressed to assist in our review of a future submission.	Noted
CITY - ENVIRONMENTAL		
1		
a)		

	<p>The boundary of the PSW has been revised since the first submission. Due to this revision, the associated 30m Setback from Limit of Wetland now encroaches onto Blocks 3 and 6, which are identified as business park blocks (see red circles on the image below). Development will not be permitted within the 30m Setback from Limit of Wetland. The City will do a housekeeping ZBA to recognize these areas as Open Space since this information was not available at the time of the City-initiated ZBA. We are agreeable to processing site plans and the City-initiated housekeeping ZBA concurrently and the ZBA will need to be finalized (i.e. decision issued, by-law passed, 20 day appeal period passed without appeal) before the site plans on these lands are approved.</p>	<p>MHBC Response: Acknowledged. Development is not proposed within the 30 m setback and the owner has no objection to the zoning of the buffer to an appropriate open space zone. The Draft Plan has been revised to adjust the boundaries of Blocks 3 and 6 such that the buffers are located within Open Space Blocks.</p> <p>In this regard, future site plan applications can proceed independent of the City's housekeeping ZBA.</p> <p>NRSI Response (Refer to attached letter): Has been addressed by NRSI in June 5 2020 letter</p>
	<p>On Block 3, Map 2 of the EIS shows the Wetland Buffer (30m) to be different from the 30m Setback from Limit of Wetland shown on the Draft Plan of Subdivision. The EIS should be revised to reflect the Draft Plan of Subdivision.</p>	<p>MHBC Response: Noted.</p>
<p>b)</p>		
	<p>I recognize the addition of Block 8 Open Space on the Draft Plan of Subdivision to capture the 15m setback from the Significant Woodland dripline as requested in my previous comments.</p>	<p>MHBC Response: Noted.</p> <p>NRSI Response (Refer to attached letter): Acknowledged</p>
	<p>As indicated in an email from myself to Peter Markine dated December 3, 2019, the City will require an easement across Block 6 in order to access Block 8 Open Space for maintenance purposes</p>	<p>MHBC Response: The requirement for an easement can be secured through an appropriate condition of draft plan approval. The location of the easement can be determined through discussions between the owner and the City.</p>
<p>2</p>		
<p>a)</p>		

	<p>Please confirm if the Limit of Floodline is also the dividing line between Block 7 and Block 9 as it is not clear on the Draft Plan of Subdivision.</p>	<p>MHBC Response: The Draft Plan has been revised to more clearly show the boundary between Blocks 7 and 9. The limits of the floodline are entirely located within Block 9.</p> <p>NRSI Response (Refer to attached letter): Has been addressed by NRSI in June 5 2020 letter</p>
	<p>The Stormwater Management Report identifies a 5m emergency access road for potential future residential along the south end of the SWM pond. An emergency access road for potential future residential will not be permitted within the 30m Setback from Limit of Wetland. Please address this item prior to the City Engineer submitting the SWM application to MOECP.</p>	<p>EXP Response: Pond design has been modified to accommodate this comment.</p>
b)		
	<p>As indicated in an email from myself to Peter Markine dated December 3, 2019, private SWM facilities or services will not be permitted on City owned lands and as such, no SWM facilities or services should be located in Block 8. I also noted that minor grading into the buffer to accommodate SWM adjacent to the buffer may be acceptable. The EIS notes that grading is proposed in the outer half of the 15m woodland buffer, but then also notes that the minimum distance between the woodland dripline and the limit of grading as 4.2m, well beyond the outer half of the limit. From my review of the EIS and the SWM Report, I would not consider the proposed grading in the buffer to be minor in nature.</p>	<p>EXP Response: Pond design has been modified to accommodate this comment.</p> <p>NRSI Response: Grading in the Significant Woodland buffer has been revised. The limit of grading now remains in the outer half of the normalized 15m woodland buffer.</p>
3		

	For any proposed offsite tree removals and grading, a letter from the affected landowner agreeing to the proposed works is required as a condition of draft plan approval.	MHBC Response: Noted – this can be addressed through an appropriate condition of draft plan approval. NRSI Response (Refer to attached letter): Acknowledged. Please see NRSI Response to Regional Comment 3 above, as well as the scoped Arborist Brief provided in Appendix I.
CITY - ENGINEERING		
Engineering		
1	As the status of the future residential lands proposed by Intermarket is still to be decided, please remove all references to these lands from the FSR and the SWM report.	EXP Response: Removed
	Water and sanitary stubs from Intermarket Road will not be provided at this time. There is sufficient capacity within the municipal infrastructure for these lands.	EXP Response: Removed
	The SWM pond storage capacity required for the lands can remain, however no explicit references or calculations pertaining to the parcel should remain in the report.	EXP Response: Noted
	Should these lands be ultimately included in the urban boundary, they will be able to connect to the Intermarket Road services and the stormwater management pond in the future. The design and approval of those connections will be part of any future development application for those lands.	EXP Response: Noted
2	Section 1 (Duplicate comment) 1st Paragraph – Subject lands are referred to be 22.106ha but on the draft plan the area is 21.939ha and the Functional Servicing Report states 22.80ha. Please revise.	EXP Response: Area updated per draft plan

	(Duplicate comment) Figure 1 – This subdivision application does not include the lands shown in orange. Please label as other lands owned by applicant or remove from figure	EXP Response: Area labelled as "Additional lands owned by applicant"
	(Duplicate comment) Figure 2 – Similar to the comment above. Please remove the other lands owned by applicant from subdivision outline.	EXP Response: Figure 2 updated
	(Duplicate comment) 6th Paragraph (after Figure 2) – IP Park Phase 2 lands are also located in the North Cambridge Business Park EA study area lands. Please revise.	EXP Response: Wording added to report
3	Section 2	
	(Duplicate comment) Figure 3 – The red text is unreadable. As noted above, please label as other lands owned by applicant or remove from figure.	EXP Response: Figure Updated
4	Section 4	
	The by-laws listed do not pertain to the design of Intermarket Road or the transfer of its ownership to the City. Please revise.	EXP Response: References to by-laws have been removed
5	Section 4.1	
	3rd Paragraph – HOOPP now owns the lands previously referred to as Phase 3, please revise any references to these lands.	EXP Response: Revised
6	Section 4.3	
	1st Paragraph – A reference to a review of the Freeport Creek crossing is stated as being done by EXP, however, no review is provided. It is also noted that the design of the Freeport Creek crossing has been completed by City, as a result this statement can be removed from the report.	EXP Response: Statement removed
	2nd Paragraph – Remove MESP, the NCBP EA established recommendations.	EXP Response: Revised
7	Section 5.3	
	2nd Paragraph – On Drawing SG-01 blocks drain front to back as no overland flow is directed to Intermarket Road. Please revise.	EXP Response: Drainage is to Intermarket. Updated.
8	Section 6	
	2nd Paragraph – Phases 1 and 2 of IP Park do not reside in Stage 2 East Side Lands. Please revise.	EXP Response: Revised
	2nd Paragraph – A May 9, 2019 drawing is referenced, however a number of subsequent coordination drawings have been shared with EXP since May 9, 2019.	EXP Response: Revised to Issued for tender set date
9	Section 6.1	

	1st Paragraph – It should be noted that the sanitary trunk sewer is not a temporary or interim condition and is being constructed to service the broader East Side Lands, which includes some land in the Township of Woolwich. The ESL (Stage 1) Interim SPS is considered an interim condition that will be needed for (approximately) the next 20 years until such time that the Region of Waterloo constructs their trunk sewer which will connect to the southern terminus of the City's trunk sewer (allowing the City to decommission the SPS) and will convey all sewage to the Kitchener Wastewater Treatment Plant. The SPS is intended to primarily service the North Cambridge Business Park Lands as outlined in the North Cambridge	EXP Response: Wording added to report
	Table 6-1 – Please confirm that all block areas are consistent with the areas outlined on the draft plan.	EXP Response: Revised
	3rd Paragraph – A 200mm dia local sanitary sewer is shown on Drawing SAN-01, which is acceptable to City staff. It should be noted that based on MOE guidelines that minimum sanitary sewer size is 200mm dia.	EXP Response: Noted
10	Section 6.1.1	
	Revise this section to be in accordance with the North Cambridge Business Park EA recommendations. Please note that the majority of trunk sewer through Phase 2 lands will be 1050mm dia with a portion being 1200mm dia crossing under the creek. Refer to latest Intermarket Road Coordination Drawing set for details.	EXP Response: Revised
11	Section 6.1.3	
	1st Paragraph – Refer to comments above regarding the Intermarket Road local sanitary sewer. And indicate where the local sanitary sewer will connect to the sanitary trunk sewer.	EXP Response: Noted. Connection point added
12	Section 6.2	
	· 1st Paragraph – HOOPP now owns the lands previously referred to as Phase 3, please revise any references to these lands.	EXP Response: Revised
	· Table 6-2 – Please confirm that all block areas are consistent with the areas outlined on the draft plan.	EXP Response: Revised
	· 6th Paragraph – Please remove reference to future residential roadway.	EXP Response: Removed
13	Section 6.2.1	
	1st Paragraph – Provide sizing calculations supporting the need for 250mm dia services.	EXP Response: As per MTE drawings
	3rd Paragraph – A meter/valve chamber in accordance with City standards will be required should there be more than 30m from P/L to building.	EXP Response: Added to report
14	Section 7	

	2nd Paragraph – Revise Cambridge and North Dumfries Hydro to be Energy+.	EXP Response: Revised
15	Section 8	
	4th item – Partial overland flow for any event over 5 year. All events up to 5 year will have no overland flow. All Intermarket Road overland flow will be conveyed to the proposed SWM pond, including Regional event flow.	EXP Response: Revised
16	Appendix B	
	Domestic Water Estimate Table – These are based on MESP and EA recommendations.	EXP Response: Removed from Appendix since included in the report as Table 6-3
Engineering - Stormwater Management		
1		
	1 st Paragraph – Subject lands are referred to be 22.106ha but on the draft plan the area is 21.939ha and the Functional Servicing Report states 22.80ha. Please revise.	EXP Response: Area updated per draft plan
	Figure 1 – This subdivision application does not include the lands shown in orange. Please label as other lands owned by applicant or remove from figure	EXP Response: Area labelled as "Additional lands owned by applicant"
	Figure 2 – Similar to the comment above. Please remove the other lands owned by applicant from subdivision outline.	EXP Response: Figure 2 updated
	6 th Paragraph (after Figure 2) – IP Park Phase 2 lands are also located in the North Cambridge Business Park EA study area lands. Please revise.	EXP Response: Wording added to report
2		
	Figure 3 – The red text is unreadable. As noted above, please label as other lands owned by applicant or remove from figure.	EXP Response: Figure Updated
	3 rd Paragraph – It is our understanding that the 30.5m wide Hydro Easement which crosses Phase 2 lands and Intermarket Road has been removed by Hydro One through discussions with Intermarket. Please revise.	EXP Response: Removed from report
	3 rd Paragraph – At this time, there is to be no emergency access road to the future lands owned by Intermarket located to the west of Phase 2. Please revise.	EXP Response: Access road removed

3	Section 4.4.1 – The information provided in this section is more historical and a record of the previous approach to SWM for Phase 2. Based on the information provided in subsequent sections, the allowable release rates from each block do not appear to be based on unit flow rates. Please review and revise, or remove if no longer applicable to the current design.	EXP Response: This method is still used for Blocks 5 and 6
4	Sections 4.51 and 4.5.2 – Indicate critical discharge target.	EXP Response: As post development flows are required to be less than predevelopment flows for the entire range of storms, all storm events are critical. Report updated to reflect this.
5		
	2 nd Paragraph – Draft plan refers to SWM block as being Block 7. Please review and revise.	EXP Response: The Pond Block is Block 7. Any wording otherwise in the section has been revised.
	Table 4-7 – Intermarket Road has a XIMP and TIMP of 0.95 but Drawing SWM-02 indicates an imperviousness of 0.83, which would be more expected. Please revise the table and modeling.	EXP Response: Table and Model have been revised
6		
	Table 4-10 – Please provide the storage required for all events 2, 5, 10, 50, 100 and 25mm.	EXP Response: Table Updated
	Paragraph 7 – All overland flows on Intermarket Road are collected by the same CB/inlet system on Intermarket Road and are conveyed into the SWM Pond. Please revise.	EXP Response: Paragraph 8 (old paragraph 7, second below Table 4-10) has been revised
	Table 4-11 & Section 4.7.2 – Table 4-13 – Post-Development without Flow Attenuation is provided, however the subdivision and Intermarket Road require quantity controls/attenuation, so it's unclear why this is included. Please remove.	EXP Response: These columns have been removed from Table 4-10 and 4-14 (old Table 4-13)
7		
	Table 4-11 – Table is missing 25mm flows.	EXP Response: 25mm flows added
	Table 4-11 – 100 year flow is inconsistent with modeling output.	EXP Response: table updated
	Table 4-12 – Please provide the storage required for all events 2, 5, 10, 50, 100, Regional and 25mm.	EXP Response: Added additional table (Table 4-13) to detail required storage for full range of storms

	Table 4-12 & Table 4-13 – Some of the information presented in the tables is inconsistent with the modeling output:	EXP Response: Table 4-12 and 4-14 (old table 4-13) updated
	- HYD 605 and 606 - 2 year, 100 year and Regional flows	
	- HYD 605 and 606 - Storage Required and Proposed	
	- HYD 513 – 2, 5, 10, 50, 100 and Regional flows	
	Table 4-13 – Table is missing 25mm flows.	EXP Response: 25mm flows added
8		
	Table 4-15 – It is noted in previous sections that the roof makes up 40% of the block area, however the proportion of landscaping and hardscaping is not noted. Please update.	EXP Response: it is assumed that the blocks will be approximately 10% landscaped area. Wording has been added to the report
	Block 4 on the draft plan has an area of 8.094ha. Please confirm that the areas outlined on the draft plan match those found in this table and revise modeling as necessary.	EXP Response: Block Areas have been updated
	Areas 411 and 410 are 0.257ha and 0.569ha respectively on Drawing SWM-02. Confirm that the values in this table are consistent with Drawing SWM-02 and revise modeling as necessary.	EXP Response: Updated
9		
	Please provide details on how major event flows are being “piped” and also being conveyed overland.	EXP Response: Additional wording added to clarify that there will be no major overland flow during minor storm events
	Table 4-16 (revised, received March 3, 2020) – Service laterals are listed as having 3.00% slopes in order to achieve 300mm dia, however it is not clear why a larger size is not proposed instead of increasing the slope. As per the Intermarket Road drawing set, sent to exp on March 18, 2020, a 2.0% service lateral with an increased pipe size has been provided to each block.	EXP Response: STM laterals to each block to be referenced from MTE plan provided March 18 2020 reflecting increased pipe sizes and 2% slopes (new Table 4-17)

10	Sections 4.8 and 4.9 – In order to clearly outline SWM requirements for each developable block (1, 2, 3, 4, 5 and 6 and other land owned by applicant), a table is to be provided that establishes target/allowable piped and overland flows for all events (2, 5, 10, 50, 100, Regional (as is necessary for the block) and 25mm). The table will also be required as a Schedule in the Subdivision Agreement, similar to Phase 1A approvals.	EXP Response: Added Table 4-19 summarizing the flows major/minor flows for Blocks 1-4. Blocks 5 and 6 are not part of the intermarket Rd sewer system and therefore not included in this table. Please see 4.10 (New Section)
11	Section 4.9 – Table 4-17 – Intermarket Road and external areas (409, 1001 and 1002) cannot have target/allowable flows applied to them as they rely on the downstream Phase 2 SWM pond. Please remove from table.	EXP Response: While Intermarket Road and external areas (409, 1001 and 1002) cannot have target/allowable flows applied to them, this table is to show the flows conveyed by Intermarket Rd. As these areas contribute to overland flow, they are included. Also, no target flows are included in this table
12	Hydraulic Calculation Sheet: Pond Storage Stage Discharge Calculations	
	All six (6) storms listed do not match Total Flow and Active Detention Storage in modeling output. Please review and revise.	EXP Response: All model results have been updated
	Please include the 25mm event.	EXP Response: 25mm included in Pond Rating Data
	A negative value appears under Orifice 2 at 302.70. Please revise	EXP Response: Pond Rating curve updated
13	Please provide hydraulic capacity calculations for overland spillway and 750mm dia outlet pipe.	EXP Response: Added analysis of the 750mm pipe to the report. The emergency spillway is included in the rating curve data as the weir
14	In accordance with MOE criteria, please provide detention storage drawdown time calculations	EXP Response: Drawdown time included
15	All drawings – Please ensure that block labels are consistent with those found in the draft plan.	EXP Response: all are consistent
16	All drawings – Please ensure that drawings are coordinated with the Intermarket Road Coordination drawing set sent March 18, 2020 to exp.	EXP Response: all are consistent
17		

	Please confirm the swale adjacent to the retaining wall will not cause any issues with hydrostatic load due to infiltration from this swale.	EXP Response: The swales is designed impervious so no infiltration
	Grading is shown to be extending into the neighbouring property to the east. The grading looks like it will also impact existing trees. A tree removal permit may be required. Please provide written permission from the property owner for any grading work will be a draft plan condition.	EXP Response: Client acknowledges this requirement. Note included SG-01
18	Drawing SS-01 – Outlet for Blocks 5 and 6 crosses through Block 8 which will be conveyed to the City as an Open Space block. Please relocate storm outlet off of Block 8.	EXP Response: The outlet has been relocated from Block 8
19		
	Please note that the location and configuration of block driveway/entrances will be addressed at the site plan application stage for each block.	EXP Response: Information noted on SG-01
	A label for Block 9 is shown west of the SWM pond block (Block 7). However the draft plan indicates that this area is actually outside of the limits of the subdivision. Block 9 has been identified as an Open Space block south of the SWM pond block (Block 7).	EXP Response: The label has been relocated to be consistent with draft plan
20		
	The limits of the SWM pond block are not clearly delineated on the draft plan. Please ensure that all pond infrastructure including weir and maintenance access road are located within the pond block (Block 7).	EXP Response: All pond infrastructure has been relocated within block 7
	Please revise storm event storage elevations as necessary in accordance with comment 12 above.	EXP Response: These have been updated
	In Section A, the rip rap adjacent to the inlet headwall structure is shown as being higher than the headwall. Please review and revise.	EXP Response: The rip-rap has been revised to match bottom of hw
	The emergency access should be relabeled as Maintenance Access Road. The road should be a 4.0m wide drivable surface, with 0.50m of shoulder/rounding on either side.	EXP Response: The maintenance access road has been re-labeled
	Indicate access road and weir surface type and indicate pavement structure.	EXP Response: The surface type are noted as asphalt on PND-01

	Indicate groundwater table elevations on Sections A and B.	EXP Response: The groundwater elevations have been added on Section A and B
	Section X is labeled as emergency spillway but appears to refer to the pond's weir. Please revise.	EXP Response: The label has been revised to Weir structure
	Section D - Indicate which OPSD headwall detail (provided on drawing) will be used at the pond outlet to Freeport Creek and indicate how the armour stone retaining wall shown above the outlet pipe will be structurally supported. As well, please provide a fence along the top of the retaining	EXP Response: The detail has been revised on PND-01
	Indicate where Section E is located.	EXP Response: Section E was labeled in Section D
	Section B –How will MH09 be protected given the near vertical slopes on the side of the plunge pool and the fact that the north side of the structure is exposed?	EXP Response: The grading has been revised to eliminate exposed face of MH9
	Section B – Label location and invert of the 100mm dia orifice associated with the reverse slope pipe.	EXP Response: Orifice labelled on drawings
	Section B – A fence is shown between access road and MH09 which will restrict access to MH09, please remove.	EXP Response: The fence has been removed
	Indicate how the reverse slope pipe extending into the plunge pool associated with MH09 will be structurally supported.	EXP Response: The plunge pool has been relocated to provide support for the pipe.
	Provide access gate CSD-ST-04 for maintenance access road at ROW limits	EXP Response: An access gate has been added on PND-01
	CITY - PLANNING	
1		

<p>As per the analysis on page 17 of the Planning Justification Report (prepared by MHBC and revised February 2020) with respect to lot sizes in Policy 2.D.22 of the Regional Official Plan (ROP), staff are supportive of the justification provided for the smaller lots on the west side of Intermarket Road due to the location of Intermarket Road constraining those lands.</p>	<p>MHBC Response: Acknowledged.</p>
<p>The lands to the east of Intermarket Road are not as constrained as the lands to the west and the location of Intermarket Road being moved towards the west was to accommodate for larger lots on the east side. An email from myself to Mark Kindrachuk on September 27, 2019 indicates that: "The City and the Region can support one large lot and one small lot for Phase 2 East. Since the total area of Phase 2 East is approximately 29 acres (12 hectares), one lot 20 acres (8 hectares) or larger and another lot made up of the remainder meets the criteria identified in the Regional Official Plan". The second submission of the Draft Plan of Subdivision does not conform to this direction, and the two small parcels to the east of Intermarket Road do not conform to ROP Policy 2.D.22.</p>	<p>MHBC Response: The intent of the policy was to ensure an adequate supply of larger industrial lots/blocks, with a corresponding minimum lot size of 8 hectares. The east side of the Draft Plan, which totals 11.632 hectares cannot be subdivided such that more than one Block is at least 8 hectares. Consistent with the policy direction, Block 4 is more than 8 hectares in size. The remainder of the lands are proposed as two separate Blocks (Blocks 5 and 6) that, even if combined, would be less than 4 hectares.</p> <p>The policy does not identify a specific need for Block sizes of 3-4 hectares versus 1-2 hectares – in this regard, as the Blocks cannot be combined into a single Block that is 8 hectares in size, or more, the design of the draft plan has considered the context, the environmental constraints to the east and has proposed two Blocks.</p>

	As a reminder, the large 20 acre (8 hectare) parcel on the east side of Intermarket Road must remain as one large lot which is identified in the site-specific Zoning By-law Amendment for these lands. The City will not support this parcel being subdivided through part lot control or consent in the future based on the direction in the site-specific Zoning By-law Amendment which supports Regional Official Plan policy. Additionally, only one servicing connection is permitted per lot for water, sanitary sewer and storm.	MHBC Response: Staff's position is noted.
2	Page 7 of the Planning Justification Report makes reference to extending municipal services and the emergency access to additional lands owned by applicant to the west. As per City engineering comments, no services or emergency/secondary access road will be provided or built at this time since those lands are currently outside of the City's urban boundary. Please remove this paragraph and any reference to this in other documents submitted as part of the plan of subdivision.	MHBC Response: The Draft Plan does not include an emergency access as a separate Block. As such, no revisions to the Draft Plan are required. As the Planning Justification Report will not form part of an official approval, we do not see the need to revise and resubmit the Planning Justification Report. The owner does not intend to install municipal services within Block 7 or provide municipal services to lands outside of the Urban Boundary as part of the development of this Draft Plan.
CITY - HERITAGE PLANNING		
1	Staff has reviewed the Stage I and II Archaeological Assessment. Staff has no concerns with the Assessment or the Phase 2 draft plan of subdivision. However, a Heritage Impact Assessment may be required during the future site plan process for the development of these lands.	MHBC Response: Noted.
CITY - Transportation		
1	Please update the draft plan of subdivision and Transportation Impact Study to identify the east-west collector as Boychuk Drive in all references.	Letter issued by Paradigm to City on June 23 2020

Parks, Recreation and Culture Division – Paul Willms		
1	122 trees above 10cm dbh were inventoried within and immediately adjacent to the site and the report notes 75% are native species with regionally significant walnut and hackberry next to the residential area. No endangered species (e.g. blue ash, butternut, etc.) were inventoried. Dry-Fresh Sugar Maple Deciduous Forest was identified in the southeastern corner of the development site and a 15m setback from dripline is indicated on the Draft Plan of Subdivision included in the review materials as well as recommendations for protection (i.e. heavy duty silt fencing as per the DVMP).	Refer to attached NRSI letter for responses to DVMP comments.
2	It is noted that no park, trail, elevated walkway, etc. are contemplated; only a 3m wide multi-use trail as part of the main road. The response to PRCD comments (page 6 in Appendix 1) are acceptable and the applicant understands that adjacent property owners' signatures will be required prior to any tree removals especially those that impact shared, boundary, or neighbour trees. These signatures are a requirement of the tree by-law permit application and the application will not be approved without those signatures. The comments suggest that "correspondence with adjacent landowners will take place at the detailed design stage" but it has been our experience that this is too late – area grading permits require an approved tree by-law permit (with tree management plan and adjacent property owner signatures); therefore, it is suggested that the applicant pursue signatures sooner rather than later in the process. Later in the document (page 12, of the DVMP/Appendix X) the applicant does note that the appropriate documentation and neighbouring landowner signatures will be pursued upon Grading Permit applications as suggested above. The applicant notes 6 boundary trees and 6 trees to be pruned; in addition 21 off-property trees are proposed for removal and 23 for pruning. All of these trees will require neighbour signatures within the tree permit application and if those signatures are not forthcoming the applicant will need to amend plans as the City will not approve a permit application for the destruction of neighbour trees without the adjacent owner's consent. The applicant should be prepared to move their proposed swales/infiltration trenches to accommodate such as scenario as these features are what is responsible for neighbour tree impacts.	Refer to attached NRSI letter for responses to DVMP comments. MHBC Response: The requirement for letters from adjacent land owners can be secured through an appropriate condition of draft plan approval. Owner has revised plans to eliminate/minimize impact to trees / adjacent properties
3	Parks and trails were in the original Terms of Reference but are no longer contemplated/were not examined in the EIS and this is acceptable to PRCD as the City will not be constructing trails or installing a park but will be accepting cash-in-lieu of parkland.	MHBC Response: Noted.

4	<p>The Detailed Vegetation Management Plan is accepted. The EIS/DVMP notes two kinds of TPZ silt fencing as well as timing windows for removals and potential bat habitat impact mitigation. 64 trees are anticipated for removal (out of the 122 inventoried). 49 trees above 20cm dbh on the subject site and offsite are proposed to be removed. The applicant is required to include these within the tree by-law permit application. The applicable fee, including Replacement Tree Fund compensation amounts for the 49 removals will accompany the application. The applicant may wish to provide trees instead of payment for the required compensation. Compensation planting is only acceptable on private property, not on any lands to come into City or public ownership (e.g. street trees, buffer planting etc. are not credited only private property trees). Should the applicant wish to reduce/eliminate the amount payable a Landscape Plan showing compensation planting on private property is required.</p>	Refer to attached NRSI letter for responses to DVMP comments.
City of Cambridge Fire Department – Mark Yantha		
1	<p>The actual roadway/street widths (curb to curb) are not provided in this document and should be circulated for a more accurate comment, but the following shall be kept in mind.</p>	Road being designed by City
2	<p>In order to successfully operate a fire truck under emergency conditions, a minimum 6m-width roadway must be provided. With this in mind, parking on the roadway would be a major concern of the fire department. Therefore, parking on a roadway should not be allowed with a proposed width of 9m (parking on one side may be acceptable if the width permits). The Cambridge Fire Department has had access problems in the past with narrow type streets/roadways and will only look favourable upon a street/roadway that has a minimum of one side posted with no parking</p>	Road being designed by City
3	<p>From 2002 to the present time, the Cambridge Fire Department has participated with Bell Canada on the PERS 911 Addressing Project/according to Bell Canada Address Standard. Address anomaly corrections and address inconsistencies are dealt with and corrected through the City of Cambridge. In order to accomplish this project, several public safety-related road-naming issues were considered including the need for roads to run continuously without a break from end to end and street name similarity. In respect of Address Standard criteria, further review will be necessary by the Fire Department for this proposal.</p>	Collector roads being designed by City. E-W collector has been renamed to Boychuk Drive.
4	<p>Ensure roadways comply with 3.2.5.6. of the Ontario Building Code.</p>	Road being designed by City
	<p>The Ontario Building Code gives a definition for a street as follows:</p>	Road being designed by City
	<p><i>Street means any highway, road, boulevard, square or other improved thoroughfare 9m (29 ft 6 in) or more in width, which has been dedicated or deeded for public use and is accessible to fire department vehicles and equipment.</i></p>	by others

	This needs to be kept in mind when widths are determined for the roadways.	Road being designed by City
5	Ensure fire hydrants are present and operational.	Road being designed by City
6	Ensure two connections to public thoroughfares if road/cul-de-sac over 100m in length.	No dead ends
7	Further review of properties at Site Plan Stage.	Noted
REGION - PLANNING		
Conformity with Regional Policies		
	The subject lands are designated "Urban Area" and "Prime Industrial/Strategic Reserve (Serviced)" in the Regional Official Plan (ROP). The following ROP policies are applicable to the proposed plan of subdivision:	
	2.D.22 Lands within the Prime Industrial/Strategic Reserve (Serviced) designation will be developed for fully serviced employment and ancillary land uses. Unless otherwise compromised by design limitations associated with <i>environmental features</i> , property configurations, the provision of new local roads or existing development, the lands will be developed as parcels greater than eight hectares in size.	MHBC Response: The policy is noted, and was addressed in the Planning Justification Report.
	2.D.25 The necessary environmental, water and wastewater servicing and transportation studies will be completed and approved by the Region, the Area Municipality, the Grand River Conservation Authority, and the Ministry of Transportation, as appropriate, before the approval of <i>development applications</i> applicable to lands within the Prime Industrial/Strategic Reserve (Serviced).	MHBC Response: Noted. The approval of these reports can either be considered by the Region and circulated agencies as part of the development review process, or through appropriate conditions of draft plan approval.
	The subject lands are located within the North Cambridge Business Park and are subject to site specific policies 8.10.66 and 8.10.70, approved as part of City of Cambridge Official Plan Amendments (OPAs) No. 7 and No. 25. The OPAs and associated zoning by-laws have implemented the above ROP policy 2.D.22 with respect to the requirement for employment lots that are greater than eight (8) hectares in size. In addition, the OPAs included policies listing additional study requirements that need to be completed prior to approving a development application on the subject lands.	MHBC Response: The Draft Plan does not include any Blocks or Servicing Easements that provide municipal services to lands outside of the urban boundary. The Plans that will form part of the approval of the Draft Plan, which would be required as conditions of draft

<p>The studies that were submitted in support of the proposed revised plan of subdivision were evaluated by Regional staff and any comments with respect to each study are provided below. Regional staff will not be evaluating or commenting on any land use contemplated for lands outside of the draft plan (i.e. adjacent lands to the west owned by the applicant). These lands are not included in the proposed plan of subdivision or the Urban Area designation of the ROP and any proposed land use on these lands will be reviewed through a separate planning process/municipal comprehensive review.</p>	<p>plan approval, will not include any servicing connections that extend beyond the urban boundary.</p>
<p>As such, Regional staff requests that any analysis or comments regarding servicing the additional lands outside of the draft plan provided within the supporting technical studies be removed entirely as those lands are not part of the proposed plan of subdivision.</p>	<p>The Technical Reports that were prepared as part of the application submission do not form part of the final approval of the draft plan. As such, revising the plans to remove certain sections does not appear to be necessary.</p>

<p>As it relates to ROP policy 2.D.22 above, the Planning Justification Report (MHBC Planning, revised February 2020) provided sufficient justification with respect to the reduced lot sizes for the proposed Business Park Blocks 1-3 on the west side of Intermarket Road. However, Regional staff does not accept or agree with the limited justification provided for the creation of the two (2) smaller Business Park Blocks 5 and 6 on the east side of Intermarket Road (page 17 states these blocks are smaller in size to reflect the constraints of the irregular shape of the lands and the abutting natural features).</p>	<p>MHBC Response: We acknowledge the Region’s support for the Block sizes on the west side of Intermarket Road.</p> <p>With regard to the Blocks on the east side of the road, staff comments suggest two options:</p> <ol style="list-style-type: none"> 1. Combine all of the Blocks into one large Block 2. Combine the Blocks in such a manner that there are no more than two Blocks, provided one of the Blocks is at least 8 hectares. <p>We support the inclusion of one Block of at least 8 hectares, and the Draft Plan includes one such Block (Block 4). The ROP and City Official Plan both permit consideration of alternative Block sizes, where the minimum 8 hectares cannot be achieved. The policy was intended to provide large Block sizes, for certain future industrial users. The policy does not specify what minimum size is required if 8 hectare cannot be achieved, nor does it limit Block creation. The total area of lands on the east side of Intermarket Road is such that two Blocks, each with at least 8 hectares, cannot be provided. As such, it is not clear what policy objective is being met if Blocks 5 and 6 were combined into a single 3.5 hectare Block, that cannot be met if they remain separate Blocks.</p>
<p>Regional staff is of the opinion that Blocks 5 and 6 are not constrained and can be combined into one larger block, or the proposed 8.01 ha Business Park Block 4 can be increased in size, without being compromised by those design limitations identified in ROP policy 2.D.22. Further, Regional staff is supportive of City's comments dated April 24, 2020 with respect to parcel sizes.</p>	

	<p>The proposed draft plan of subdivision does not conform with ROP policy 2.D.22. The draft plan needs to be revised to include on the east side of Intermarket Road either one (1) large business park block, <u>or</u> no more than two (2) business park blocks with one of the blocks being at least eight (8) hectares in size or greater.</p>	
	<p>ROP policy 2.D.23 below provides an opportunity for monitoring the employment lands inventory. If it can be demonstrated that there is a critical shortfall of smaller industrial parcels, smaller parcels may be permitted through an amendment to the City of Cambridge Official Plan.</p>	<p>MHBC Response: This policy is intended to permit the creation of a Draft Plan with entirely smaller Blocks, should the monitoring requirement be met. The proposed Draft Plan is not proposing that all Blocks on the east side be smaller industrial parcels. One of the Blocks does meet the minimum required size. The remainder of the lands cannot meet the minimum. In such a situation, it is not clear where the Policies express a preference for one smaller Block, versus two smaller Blocks, particularly when there are environmental constraints that impact the shape, dimensions and ultimate development potential of one Block versus two separate Blocks.</p>
	<p>2.D.23 Notwithstanding Policy 2.D.22, where monitoring clearly demonstrates that there will be a critical shortfall in the inventory of lands available in the short to medium term to meet the needs of new and expanding businesses requiring lot sizes less than eight hectares, the Area Municipality may permit, through amendment to its official plan, the creation of smaller parcels to meet those needs.</p>	
Land Use Compatibility		

<p>The proposed business park blocks on the west side of Intermarket Road are adjacent to existing residential properties on Riverbank Drive. OPA 7 considered land use compatibility between these residential properties and the proposed business park lands. A 70-metre Transition Area was included and site-specific policy 8.10.66.2 outlined various requirements to help minimize possible negative impacts from future employment uses on existing residential properties, including a provision for a solid fence or a noise barrier wall with a minimum height of 2.4 metres and a 7-metre wide planting strip along the property line. The special policy also included the requirement for the completion of a Stationary Noise Study for these lands at the time of a future development application and the implementation of any appropriate noise mitigation measures through a site plan or subdivision</p>	<p>MHBC Response: Acknowledged. The requirement for a future Stationary Noise Study can be secured through an appropriate condition of draft plan approval.</p>
<p>As such, as a condition of draft plan approval, the Region will require the Owner/Developer to enter into a development agreement with the City of Cambridge to complete, prior to site plan approval for any business park block within this plan, a Stationary Noise Study to confirm the requirement for a noise barrier wall and/or recommend other appropriate noise mitigation measures, and if required, to enter into a subsequent agreement to implement any approved noise mitigation measures.</p>	
<p>REGION - ENVIRONMENTAL</p>	
<p>The subject lands are adjacent to a Core Environmental Feature (Significant Woodland) and the Upper Freeport Creek Wetland Complex. Environmental Planning staff have reviewed the revised draft plan of subdivision and supporting documents and offer the following comments on the revised materials as well as the proposed stormwater management pond. The comments below are limited to the environmental features and associated policies of the Regional Official Plan (ROP), but staff has also reviewed the correspondence provided by the City of Cambridge (correspondence from Kathy Padgett, March 25, 2020) and the GRCA (correspondence from John Brum, March 26, 2020), and are supportive of the comments provided therein.</p>	<p>Noted</p>

1	<p>There is a candidate Environmentally Sensitive Policy Area (ESPA) within the limits of the subject lands, identified as Candidate ESPA 2 in the Freeport Creek and Tributary to the Grand Subwatershed Study (November, 2013) completed through the Master Environmental Servicing Plan (MESP) for the East Side Lands – Stage 1. Although the ESPA is not yet mapped in the Regional Official Plan (ROP), it should be reviewed and refined through local Environmental Impact Statements (EIS). The revised EIS (Section 5.2.4, Cambridge IP Business Park Phase 2: Business Park, NRSI, February 2020) states that the ESPA is not incorporated into the ROP at this time, but does not further address the recommendations of the MESP (East Side Lands, Stage 1) to identify and evaluate the elements of the Greenlands Network and interpret the boundaries of the environmental features through local assessments, as identified in Section 9.1 of the Freeport Creek and Tributary to the Grand Subwatershed Study.</p>	<p>NRSI Response (Refer to attached letter): Section 5.2.4 of the Submission 2 EIS (February 13, 2020), provides a brief summary of Candidate ESPA 2, while other sections and mapping throughout the EIS refine and interpret the boundaries of the ESPA and evaluate the elements of the Greenlands Network. A brief summary is provided in the following paragraphs.</p>
		<p>The Upper Freeport Creek PSW and Significant Woodland form the majority of a contiguous block of naturalized land containing a variety of upland and wetland habitats that was determined to meet the criteria for designation as an ESPA in the Subwatershed Study (Aquafor Beech Ltd. 2013). In the Submission 2 EIS, the PSW is characterized in sections 5.2.2 and 5.3.2, and its ecological functions and significance are discussed in Sections 6.1, 6.4, and 6.5. The Significant Woodland is characterized in sections 5.2.1, and its ecological functions and significance are discussed in Sections 6.3, 6.4, and 6.5.</p>

	<p>Section 5.3.5 provides a detailed Greenlands Network Vegetation Analysis that summarizes changes to the elements of the Greenlands Network that occurred within the subject property between its identification in the 2013 Subwatershed Study and the natural heritage studies conducted to inform the 2020 EIS.</p>
	<p>Map 1 (Revised Draft Plan of Subdivision) of the SWM Pond Response Letter (June 5, 2020) shows the PSW boundaries delineated in 2018 and 2020 and their 30m buffers. Post-development, south of the proposed subdivision the boundary of Candidate ESPA 2 is recommended to extend to the edge of the 2020 PSW 30m buffer. The 2020 PSW boundary was approved by the GRCA on July 14, 2020 via email correspondence from John Brum (GRCA) to Mark Kindrachuk (Intermarket Properties).</p>
	<p>Map 2 of the Submission 2 EIS (February 13, 2020) and the revised grading plans and Draft Plan of Subdivision submitted by EXP as part of this current submission show the dripline of the Significant Woodland and its 15m buffer. Post-development, the edge of the 15m buffer is recommended to be the new boundary of Candidate ESPA 2 along the remainder of the southern subject property boundary.</p>

2	<p>The buffers provided in the EIS does not correspond to the recommendations of the Freeport Creek and Tributary to the Grand Subwatershed Study, although Section 7.3 of the EIS references the correct buffer widths. The approach to “smooth” the buffers does not include adequate justification, and as such the proposed development and grading within the buffers cannot be supported at this time, including the stormwater pond within an environmental feature and the associated buffer.</p>	<p>Has been addressed in NRSI June 5 2020 letter</p>
3	<p>The proposed grading and development is dependent on off-site tree removals and access, yet permissions have not been obtained as yet. Given the grading is dependent on the support and permission from the adjacent landowner, it is recommended that this be provided at this time, otherwise, modifications to the plans will be required.</p>	<p>NRSI Response: As part of the revised Draft Plan, the retaining wall and grading along the western property boundary have been shifted east to ensure that all off-property trees can be retained. A scoped Arborist Brief has been prepared to summarize and map the changes to the tree retention analysis for the Cambridge IP Phase 2 development based on these modifications (Appendix I). It is not anticipated that any offsite trees will be impacted, and landowner agreements will therefore not be required.</p>
4	<p>In Section 7.5.6 of the EIS it states that the hours of construction will be restricted to between 7:00AM-7:00PM, which will minimize impacts to adjacent wildlife in the environmental features. It is requested that the City confirm if there are general restrictions regarding hours of operation for construction sites or if site-specific restrictions will be in place for the subject site in order to ensure that the recommended mitigation identified in the EIS is implemented.</p>	<p>NRSI Response: The City of Cambridge has a noise bylaw that prohibits and regulates noise between 8:00pm and 7:00am. Email correspondence from Kathy Padgett (City) to Desta Frey (NRSI) on July 14, 2020 confirmed that working hours are between 7am and 8pm. Therefore, recommended mitigation identified in the EIS would be generally be regulated through the City’s noise bylaw enforcement.</p>
<p>Prior to draft plan approval, the above items must be addressed through the submission of an EIS Addendum and/or through revisions to the draft plan.</p>		<p>Noted</p>

<p>Further, the southern boundaries of Business Park Blocks 3 and 6 extend into the 30 metre wetland setback/buffer, and it is not clear where the boundary lies between Stormwater Management Block 7 and Open Space Block 9. Each block within the draft plan must be clearly delineated with a solid line.</p>	<p>MHBC Response: The Draft Plan has been revised to more clearly delineate the boundaries of each Block. The boundary between Blocks 7 and 9</p>
<p>Prior to draft plan approval, the proposed plan of subdivision must be revised to clearly delineate the boundary of each business park block, which is not to include any portions of the environmental features or associated buffers. The boundaries of all Open Space blocks and the Stormwater Management block must also be clearly delineated.</p>	<p>is now distinguished from the other line work on the portion of the Draft Plan. The limits of the floodline are located entirely within Block 9</p> <p>The limits of Blocks 3 and 6 have been adjusted to exclude any portion of the 30 metre wetland setback. The wetland setback buffers are located entirely within Open Space Blocks.</p> <p>EXP Response: provided on all plans</p>
<p>Hydrogeology and Source Water Protection</p>	
<p>Hydrogeology and Source Water Protection (HSW) staff have reviewed the revised plan of subdivision and the Stormwater Management Report (EXP Services Inc., revised February 14, 2020), Hydrogeological Assessment and Water Balance - Final Report (EXP Services Inc., updated January 2020) and Chloride Impact Study (EXP Services Inc., February 2020).</p>	
<p>Prior to draft plan approval, a proposed during- and post-construction Groundwater Monitoring Program must be submitted to the satisfaction of the Region, the City and the GRCA. The Groundwater Monitoring Program can be submitted as an Addendum to the Hydrogeological Report.</p>	<p>EXP Response: Please review modified program</p>
<p>In addition, the following items can be addressed through the conditions of draft plan approval:</p>	
<p>1. The Owner/Developer will be required to enter into a development agreement with the Regional Municipality of Waterloo/ City of Cambridge to submit, to the satisfaction of the Region, the City and the GRCA, a final Stormwater Management Report for each business park block as part of a future Site Plan application . All infiltration galleries are to be oversized by 15% to account for decreased performance and/or disconnections in the future.</p>	<p>Noted</p>

	2. The Owner/Developer will be required to enter into a development agreement with the Regional Municipality of Waterloo/ City of Cambridge to submit, to the satisfaction of the Region, a Salt Management Plan for each business park block as part of a future Site Plan application.	Noted
	3. The Owner/Developer will be required to enter into a development agreement with the Regional Municipality of Waterloo/ City of Cambridge to submit, to the satisfaction of the Region, a Spill Prevention, Management and Containment Plan as part of a future Site Plan application where chemical storage is proposed to occur (including fuel storage and/or retail	Noted
	4. The Owner/Developer will be required to enter into a development agreement with the Regional Municipality of Waterloo / City of Cambridge to complete during- and post-construction monitoring, in accordance with the Groundwater Monitoring Program (to be submitted prior to draft approval). Post-construction monitoring will be required for two years following 90% build-out.	Noted
Water Services		
	Water Services staff has reviewed the Functional Servicing Report (EXP Services Inc., revised February 14, 2020) and provides the following comments .	
	Reference to "ultimately connecting to a future Regional Pumping Station SPS#2 located to the west of the Cambridge IP Park Phase 1 lands" is not valid. The Pumping Station has now been identified as a City of Cambridge Pumping Station.	EXP Response: Revised to "ultimately connecting to a future City of Cambridge Pumping Station located to the west of the Cambridge IP Park Phase 1 lands"
	This section has identified that the watermain on Intermarket Road will be a 300 mm in diameter. It also states: "The watermain distribution analysis will confirm the suitability of the sizing and flows. This analysis is being completed for phases 1, 2 and 3 of the IP Park Development. It has been completed by others." This information needs to be included in an updated Functional Servicing Report prior to draft plan approval.	EXP Response: Watermain distribution analysis now included in the FSR as Appendix D
	Summary point 3 does not provide enough supporting information to demonstrate how the initial phases or intermediate phases can permit the proposed subdivision to proceed without the looped system.	EXP Response: Reference added to the Water Distribution Analysis. The report assumed in Phase 2 the watermain will loop back to the existing 300mm diameter watermain along Fountain Street via Allendale Road

	The following Water Services comments provided in the Region 's letter of March 8, 2019 have not been addressed in this updated Functional Servicing Report.	
1.	The discussion about pipe sizes and velocities is not sufficient for determining whether the proposed development can be supported by the existing infrastructure. The provision of water service connection at the south end is also unclear: what infrastructure is assumed to be constructed in advance of the proposed Phase 2 plan of subdivision? For example, it is assumed that the Creekside Phase 1A subdivision watermains are constructed and in operation.	EXP Response: Added assumptions and results from the watermain distribution analysis
	Would this be the case for Phase 1B too? The report should discuss anticipated pressure in the subdivision. Are pressure reducing valves going to be required?	
2.	There is no discussion about the proposed development exceedance of the maximum dead-end length for servicing . The proposed industrial subdivision is in exceedance of the maximum 150m length for dead-ends, as outlined in the DGSSMS. This does not include a long dead end from Maple Grove Road on Boychuk Drive if no connection is made to King Street East. Looping on Allendale Road will be something that occurs in the ultimate configuration of the water distribution system, but nothing has been addressed in the initial phases or intermediate phases.	EXP Response: Added assumptions from the watermain distribution analysis (loop on Allendale to Fountain St is required for the Phase 2 development. The loop on Middle Block Rd occurs in the ultimate configuration). The only dead end is in the western portion of Phase 1 after the development of Phase 2.
	In summary , the Functional Servicing Report does not provide sufficient justification that the proposed subdivision can be supported by existing and planned infrastructure and any supporting analysis completed by others was not included in this report. An updated Functional Servicing Report must be submitted to the satisfaction of the Region and the City prior to draft plan approval.	Noted
Region of Waterloo International Airport		

<p>The proposed development is located within six kilometres of the Region of Waterloo International Airport. Any construction cranes proposed to be used in the construction of this development may protrude into prohibited airspace as designated by the Region of Waterloo Airport Zoning Regulations. The use of construction cranes may require the applicant to obtain Transport Canada's Aeronautical Assessment Form for Obstruction Evaluation and approval from NAV Canada through their land use application process. Please contact Mr. Kevin Campbell, Project Manager, at the Region of Waterloo International Airport (519-648-2256 x8511) for assistance in acquiring the required federal and municipal clearances .</p>	<p>Noted</p>
<p>The Owner/Developer is advised that the lands, or a portion of the lands, are subject to the Region of Waterloo International Airport Zoning Regulations issued under the federal Aeronautics Act. The purpose of the Regulations is two-fold: 1) to prevent lands adjacent to or in the vicinity of the Region of Waterloo International Airport site from being used or developed in a manner that is incompatible with the safe operation of the airport or an aircraft; and 2) to prevent lands adjacent to or in the vicinity of facilities used to provide services relating to aeronautics from being used or developed in a manner that would cause interference with signals or communications to and from aircraft or to and from those facilities.</p>	<p>Noted</p>
<p>It is the Owner's/Developer's responsibility to be aware, and to make all users of the land aware of the restrictions under these Regulations which may include but not limited to height restrictions on buildings or structures, height of natural growth, interference with communications, and activities or uses that attract birds.</p>	<p>Noted</p>
<p>Transit Planning</p>	
<p>Grand River Transit currently has no plans for a transit route through these lands; however, the development should not preclude the future addition of transit service, including the design of the street, potential bus stop locations and pedestrian infrastructure such as walkways and sidewalks.</p>	<p>MHBC Response: The design of Intermarket Road does not preclude the future installation of GRT bus stops.</p> <p>We acknowledge the comment regarding the figures used within the Planning Justification Report and Urban Design Brief – however, as neither report forms part of the official approval of the draft plan, we do not see the need to reissue and print additional copies of both reports.</p>

<p>Regional staff notes that the "Future LRT Route" and "ION Light Rail Stage 2 Station" identified on Figure 3 of the Planning Justification Report (PJR) (MHBC Planning, revised February 2020) does not align with the preferred route for Stage 2 ION endorsed by Regional Council in June 2019. The Urban Design Brief (MHBC Planning, February 2020) also includes incorrect information regarding the Stage 2 ION route.</p>	
<p>The PJR and Urban Design Brief should be updated prior to draft plan approval to include the correct information with respect to the preferred Stage 2 ION route as endorsed by Regional Council.</p>	
<p>Next Steps</p>	
<p>The Owner/Developer should be advised that receipt of these post circulation comments does not constitute a draft or final approval of this application. The Owner/Developer must address all of the above noted comments and submit any required updated reports to the Region for review and approval. Prior to draft approval by the Region, the City of Cambridge must provide formal comments on the application and/or a recommendation in support of draft plan approval, including the City's conditions of draft approval.</p>	<p>Noted</p>
<p>Prior to draft approval, the Owner/Developer must submit to the Region 25 copies of the plan to be draft approved and the Regional Draft Approval fee of \$4,025 in accordance with the Region's fee by-law (17-076) or any successor thereof . Once the plan of subdivision is draft approved, the draft approval will take effect 21 days after the day the notice of decision is issued, provided no appeals are received in accordance with Section 51(39) of the <i>Planning Act</i>.</p>	<p>Noted</p>
<p>REGION - CORRIDOR PLANNING</p>	
<p>Corridor and Transportation Planning staff reviewed the Creekside Phase 2 Transportation Impact Study (Paradigm Transportation Solutions Limited, February 2020) and comments were provided to the consultant in an email dated April 20, 2020, which are attached to these comments as Appendix "C". The comments must be addressed in a Memo and submitted to the Region for review prior to draft plan approval. (copied below)</p>	<p>Region issued clearance letter Aug 4 2020</p>
<p>Region staff have reviewed the report entitled Creekside, Phase 2, Cambridge, Ontario, Transportation Impact Study, prepared by Paradigm Transportation Solutions Limited and dated February 2020 and provide the following comments:</p>	<p>Region issued clearance letter Aug 4 2020</p>

• In the original October 2018 TIS submission for Creekside Phase 2, the calculated trip generation for Phase 1A was 138 total trips (AM) and 16 total trips (PM). In the revised submission, these numbers are increased to 396 (AM) and 356 (PM) Please provide details around trip generation for Phase 1A and 1B. See excerpts below:

Region issued clearance letter Aug 4 2020

Original Submission:
TABLE 3.2: FORECAST DEVELOPMENT TRIP GENERATION BY PHASE

Phase / Land Use	Footprint (ft ²)	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Phase 1A							
General Industrial	550,000	66	9	75	9	0	9
Data Center	100,000	56	8	64	7	0	7
Phase 1A Total	650,000	122	17	138	16	0	16
Phase 1B							
Office	220,000	219	36	255	40	213	253
Auto Dealership	42,000	57	21	78	41	61	102
Phase 1B Total	262,000	276	57	333	81	274	355
Phase 2							
General Industrial	850,000	524	71	595	70	466	536
Phase 2 Total	850,000	524	71	595	70	466	536

Revised Submission:

- ▶ Phase 1A consists of 550,000 sq.ft. of general industrial and 100,000 sq.ft. of data centre land uses. This is forecast to generate 396 and 356 trips during the AM and PM peak hours, respectively.
- ▶ Phase 1B consists of 220,000 sq.ft. of general office and 42,000 sq.ft. of auto sales land uses. This is forecast to generate 334 and 355 trips during the AM and PM peak hours, respectively.

Appendix C contains the Phase 1A and Phase 1B development traffic volumes.

Region issued clearance letter Aug 4 2020

• It appears that the ITE Trip Generation Manual's Land Use Code 770 (Business Park - rate= 0.40) was used for the Phase 2 trip generation in the resubmission, whereas they used Land Use Code 110 (General Light Industrial - rate= 0.70) in the first submission. This results in a major reduction of total trips associated with the Phase 2 component of this development; previously, 595 (AM) and 536 (PM), now 315 (AM) and 315 (PM). Please clarify as to why the development lands are more suited for LUC 770 vs 110 as previously used.

Region issued clearance letter Aug 4 2020

Hydro One

<p>Please be advised that Hydro One Networks Inc. ("HONI") has completed a preliminary review of the proposed plan of the above noted subdivision application. As the subject property is abutting and/or encroaching onto a HONI high voltage transmission corridor (the "transmission corridor"), HONI does not approve of the proposed subdivision at this time, pending review and approval of the required information.</p>	<p>Hydro One easement has been extinguished - comments no longer applicable</p>
<p>The comments detailed herein do not constitute an endorsement of any element of the subdivision design or road layout, nor do they grant any permission to access, use, proceed with works on, or in any way alter the transmission corridor lands, without the express written permission of HONI.</p>	<p>Hydro One easement has been extinguished - comments no longer applicable</p>
<p>The following should be included as Conditions of Draft Approval:</p>	<p>Hydro One easement has been extinguished - comments no longer applicable</p>
<p>1. The developer must contact Lana Kegel, Sr Real Estate Coordinator at 905-946-6277 to discuss all aspects of the subdivision design, ensure all of HONI's technical requirements are met to its satisfaction, and acquire the applicable agreements.</p>	<p>Hydro One easement has been extinguished - comments no longer applicable</p>
<p>2. Prior to HONI providing its final approval, the developer must make arrangements satisfactory to HONI for lot grading and drainage. Digital PDF copies of the lot grading and drainage plans (true scale), showing existing and proposed final grades, must be submitted to HONI for review and approval. The drawings must identify the transmission corridor, location of towers within the corridor and any proposed uses within the transmission corridor. Drainage must be controlled and directed away from the transmission corridor.</p>	<p>Hydro One easement has been extinguished - comments no longer applicable</p>
<p>3. Any development in conjunction with the subdivision must not block vehicular access to any HONI facilities located on the transmission corridor. During construction, there must be no storage of materials or mounding of earth, snow, or other debris on the transmission corridor.</p>	<p>Hydro One easement has been extinguished - comments no longer applicable</p>
<p>4. At the developer's expense, temporary fencing must be placed along the transmission corridor prior to construction, and permanent fencing must be erected where subdivision lots directly abut the transmission corridor after construction is completed.</p>	<p>Hydro One easement has been extinguished - comments no longer applicable</p>
<p>5. The costs of any relocations or revisions to HONI facilities which are necessary to accommodate this subdivision will be borne by the developer. The developer will be responsible for restoration of any damage to the transmission corridor or HONI facilities thereon resulting from construction of the subdivision.</p>	<p>Hydro One easement has been extinguished - comments no longer applicable</p>
<p>6. HONI's easement rights must be protected and maintained.</p>	<p>Hydro One easement has been extinguished - comments no longer applicable</p>
<p>In addition, HONI requires the following be conveyed to the developer as a precaution:</p>	<p>Hydro One easement has been extinguished - comments no longer applicable</p>

<p>7. The transmission lines abutting the subject lands operate at either 500,000, 200,000 or 115,000 volts. Section 188 of Regulation 213/91 pursuant to the <i>Occupational Health and Safety Act</i>, require that no object be brought closer than 6 metres (20 feet) to an energized 500 kV conductor. The safe vertical distance for 230 kV conductors is 4.5 metres (15 feet), and for 115 kV conductors it is 3 metres (10 feet). It is the developer's responsibility to be aware, and to make all personnel on site aware, that all equipment and personnel must come no closer than the safe vertical distance specified in the <i>Act</i>. All parties should also be aware that the conductors can raise and lower without warning, depending on the electrical load placed on the line.</p>	<p>Hydro One easement has been extinguished - comments no longer applicable</p>
<p>Our preliminary review only considers issues affecting HONI's transmission facilities and transmission corridor lands. For any proposals affecting distribution facilities (low voltage), the developer should consult the local distribution supplier.</p>	<p>Hydro One easement has been extinguished - comments no longer applicable</p>
<p>Energy+ Inc.</p>	
<p>In response to the original draft plan submission, Energy+ Inc. advised in a letter dated December 21, 2018 that, the Owner/Developer will be required to enter into an Agreement with the Hydro Authority to establish the conditions of electrical service, including the financial requirements for servicing. Further, the Owner/Developer must grant easements to the Authority's satisfaction and will be responsible for all costs associated with relocation of existing electrical plant, if required, as a result of this development. The Region will require the Owner/Developer to satisfy the above requirements as a condition of draft plan approval, unless additional comments are received with respect to the revised plan.</p>	<p>MHBC Response: Acknowledged. This can be addressed through a standard condition of draft plan approval.</p>
<p>Union Gas Limited</p>	
<p>Union Gas Limited advised in their email of March 10, 2020 that, as a condition of draft plan approval, the Owner/Developer will need to provide Union Gas with the necessary easements and/or agreements for the provision of gas services to this plan.</p>	<p>MHBC Response: Acknowledged. This can be addressed through a standard condition of draft plan approval.</p>