

Response to City of Cambridge, Region of Waterloo and Grand River Conservation Authority Comments – iPort Cambridge

City of Cambridge Comments	
Comment – Development Planning	Response
<p>The lands west of Street A are currently not designated or zoned for the proposed use. If an application for an Official Plan Amendment and Zoning By-law Amendment for these lands is not submitted concurrently with the Draft Plan of Subdivision, the lands west of Street A cannot be considered as part of the Draft Plan of Subdivision application. Additionally, any reference to these lands as part of the application must be removed from all reports and these lands should be identified as 'Additional Lands Owned by Applicant' on the draft plan.</p>	<p>The lands west of Street A have been removed from the limits of the Draft Plan, save for Block 6 which is proposed as an Open Space Block, and Block 7, which contains the stormwater management facility. The lands outside of the Draft Plan that are owned by the applicant have been so identified.</p>
<p>In addition to the above comment, the location of the SWM facility/block will need to be addressed with respect to its location outside of the Urban Area Boundary. The lands are also currently under appeal to the Local Planning Appeal Tribunal. To keep the Draft Plan of Subdivision application moving forward for the designated and zoned lands east of Street A, City staff suggest an interim SWM facility/block be located at the southwest corner of Block 3, adjacent to Open Space Block 6.</p>	<p>The proposed SWM facility is proposed on lands west of Street A. The location and boundary of the future facility is delineated on the Draft Plan (Block 7). Previous discussions with City and Regional staff regarding the location of the SWM facility partially within and outside of the Urban boundary has resulted in the revisions to the Draft Plan. As such, no interim facility is required or proposed.</p>
<p>City staff is supportive of the large block sizes being proposed to the east of Street A, which supports the site-specific Official Plan and Zoning By-law Amendments and Regional Official Plan policy for large lot sizes for Prime Industrial Strategic Reserve lands. Please note that in the future the City will not support large parcels being subdivided through part lot control or consent. Additionally, only one servicing connection is permitted per lot for water, sanitary sewer and storm water.</p>	<p>It is not clear why the City is prematurely restricting future planning application(s), which may subdivide Blocks 2 or 3. Block 3 is more than 27 hectares and Block 2 is 37 hectares. Both could be subdivided while still maintaining the minimum 8 hectare lot size identified in the Official Plan and Zoning By-law. In our opinion, it is premature for staff to take a position on planning applications that have not been submitted, particularly when the size of the Blocks would permit future subdivision in conformity with the Official Plan and compliance with the Zoning By-law.</p>
Planning Justification Report	
<p>Figures 1-11 – Identifies the Creekside Phase 1 and 2 lands as</p>	<p>The Figures have been revised.</p>

<p>'Additional Lands Owned by Applicant' when these lands are owned by Intermarket CAM Ltd. and not iPort Cambridge GP Inc. Please revise.</p>	
<p>Footer – The footer references 'Phase III Industrial Lands', please update to reference the applicants' preferred terminology for these lands as 'iPort Cambridge'. This also requires updating throughout Chapter 5 with references to Intermarket/Phase 3 lands.</p>	<p>All future references to the application and subject lands will refer to them as "iPort Cambridge" for consistency. The Planning Justification Report has been updated accordingly.</p>
<p>Section 2.2, Subsection 1.1 - Site Description (last paragraph) – The last paragraph states that the proposed subdivision is located 'on lands already designated and zoned for the proposed use.' This statement is only accurate for the lands east of Street A. Please revise this where necessary throughout the document.</p>	<p>We acknowledge that the lands west of Street A are not zoned and designated for employment uses. They are no longer part of the Draft Plan, save for the Open Space Block (Block 6) and SWM Facility Block (Block 7), both of which will be dedicated to the City.</p>
<p>Section 4.2 - Provincial Policy Statement, 2014 – Please update this section to reflect that this application must conform to the Provincial Policy Statement, 2020. Please include analysis of any applicable additional/revised Provincial policies.</p>	<p>The reference and analysis have been updated.</p>
<p>Section 4.2 - Land Use Compatibility – The second paragraph states that Official Plan Amendment No. 30 and Zoning By-law Amendment 103-18 'analyzed the compatibility of the proposed industrial land use with the rural residential land uses to the west of the subject lands'. This should actually reference the residential land uses to the southeast of the subject property, not to the west.</p>	<p>The reference has been corrected</p>
<p>Section 4.2 - Natural Hazards – Inaccurately references 'Provincial Policy Plan' as opposed to 'Provincial Policy Statement'.</p>	<p>The reference has been corrected</p>
<p>Section 4.6 - City of Cambridge Zoning By-law – The second last paragraph makes reference to the site-specific provision for the 70 metre transition area should be S.4.1.348.2 (as opposed to S.4.348.2). The 70 metre transition area should also be referenced as 'area', not 'zone' to reflect the terminology in the site-specific provision.</p>	<p>The reference has been corrected</p>
<p>Section 5.5 - Preliminary Stormwater Management Report – Remove reference to 'future development lands (planned for parkland, future residential and industrial block development)' as the status of these lands is yet to be decided.</p>	<p>The lands west of Intermarket Road have been removed from the Draft Plan, save for the Open Space Block (Block 6) and SWM Facility Block (Block 7), both of which will be dedicated to the City.</p>
<p>No mention is made in the Planning Justification Report of Official Plan Amendment No. 35 – North Cambridge Business Park – Parks and</p>	<p>An analysis of conformity with Official Plan Amendment No. 35 has been included within the revised Planning Justification Report.</p>

Trails. Conformity with Official Plan Amendment No. 35 needs to be explained and analyzed in the Planning Justification Report.	
Urban Design Brief	
Figures – Similar to the comments made for the Planning Justification Report, the Figures identify the Creekside Phase 1 and 2 lands as 'Additional Lands Owned by Applicant' when these lands are owned by Intermarket CAM Ltd. and not iPort Cambridge GP Inc. Please revise.	Acknowledged. The Brief has been updated accordingly
Terminology – Similar to the comments made for the Planning Justification Report, please update the document to reference the applicants' preferred terminology for these lands as 'iPort Cambridge.	The Brief has been updated accordingly
Section 1 - Introduction – Similar to the comments made for the Planning Justification Report, the Official Plan and Zoning By-law Amendments are only applicable to the lands east of Street A.	The lands west of Street A (Intermarket Road) have been removed from the Draft Plan, save for the Open Space Block (Block 6) and SWM Facility Block (Block 7), both of which will be dedicated to the City.
Environmental Planning - City	
Section 2.1 – The second paragraph states that the City designed Street A. While the preferred alignment was determined through the EA, Street A has not yet been designed. The City has also had discussions with the applicant that the City will not be designing Street A from Allendale Road to Middle Block Road. Please revise.	The description of the proposed undertaking has been revised accordingly (see Section 1.1 in the EIS Addendum).
Section 2.3 – The City provided comments on the Terms of Reference on December 7, 2018 and received an emailing confirming receipt. Please revise to acknowledge this.	Section 1.2 of the EIS Addendum acknowledges the receipt of these comments from the City of Cambridge; comments are included in Appendix I of the Addendum.
Table 2 – Agency review of wetland boundary and woodland dripline delineation took place on October 17, 2018, not 2019	Section 4.0 of the EIS Addendum specifies this correction
Section 4.1.3 – October 9, 2019 should be 2018	Section 4.0 of the EIS Addendum specifies this correction
The EIS indicates that due to the large development blocks there was a need for some minor normalizing ('smoothing') of some sections of irregular protective buffers, as well as the removal of a small wedge (0.4 ha) of degraded wetland. I disagree with this approach. These environmental features have been identified and well documented in the MESP and recent Official Plan and Zoning By-law Amendments and are subject to the Core Environmental Feature Policies of the Regional and Cambridge Official Plans. Encroachment into, or removal of, Core Environmental Features is not supported	The Draft Plan has been revised to entirely avoid the PSW. Development is no longer proposed inside the boundaries of this natural feature (see Map 1 of the EIS Addendum).

<p>Please provide a map identifying the Wetland Boundary, the Normalized Wetland Buffer and the distance between the two along the entirety of the feature in order to understand what the actual proposed setbacks are using the 'smoothing' approach.</p>	<ul style="list-style-type: none"> i) Map 1 of the EIS Addendum shows the wetland boundary and the Normalized 30m Wetland Setback. The revised setbacks now range between a minimum of 15m to a maximum of 94m. These minimum and maximum buffer widths are shown on Map 1. The majority of the buffer remains 30m or more from the delineated PSW boundary. ii) The revised Draft Plan now shows the PSW and its normalized buffer as part of Block 5 (Open Space).
<p>The EIS notes that a portion of the PSW (SWT2-13) has been cleared (0.4 ha) within the past 2 years despite this being contrary to Regional and Cambridge Official Plan policy for Core Environmental Features. This clearing must have occurred since the agency site visit on October 17, 2018 as this issue was not observed at that time. The EIS proposes to remove the wetland lobe and re-create wetland in the space between the PSW and woodlot. The approach to remove the wetland lobe directly contradicts the recommendations in the MESP. Section 4.1.3.5 of the MESP states:</p> <p>"Additional enhancement opportunities include...filling in select edges of the Maple Grove Provincially Significant Wetland (PSW) (ELC Polygon C6) and forest (ELC Polygon C5) (See Figure 4.1.11). The aim is to create a larger, block-like wooded habitat unit by 'eliminating' the extant wooded peninsula through afforesting extant open/farmed areas" (Page 300, MESP).</p> <p>The MESP does not advise to physically remove the wetland lobe (or extant wooded peninsula), but to forest the land adjacent to it to create a more block-like habitat, which would then 'eliminate' the extant wooded peninsula because it would become part of a larger wooded block. The proposed approach to remove the wetland lobe cannot be supported. Efforts should be placed on restoring the seemingly intentional destruction that has occurred to the wetland lobe.</p>	<p>The Draft Plan has been revised to entirely avoid the PSW. Development is no longer proposed inside the boundaries of this natural feature (see Map 1 of the EIS Addendum).</p> <p>Based on discussions that occurred during the agency site walk (October 17, 2018) with Region of Waterloo Environmental Planner Albert Hovingh, NRSI understands that the clearing within Thicket Wetland lobe was conducted by the tenant sod farmer after obtaining support from the Region for the activity. Trees within the lobe were proposed for removal so as to reduce the amount of shading to adjacent areas of sod. The characterization of the Thicket Wetland by NRSI botanists took place on October 9, 2018, prior to the agency site visit. At that time, the SWT2-13 inclusion was already described as anthropogenically disturbed and cleared of large trees.</p> <p>Section 3.1 of the EIS addendum provides additional recommendations for the enhancement of this wetland lobe under the post-development scenario.</p>

<p>Please provide a map identifying the Significant Woodlands dripline, the buffer and the distance between the two along the entirety of the feature in order to understand what the actual proposed setbacks are. The proposed buffer along the southern portion of the Significant Woodland (Block 6 Open Space) appears to be particularly impacted by the 'smoothing' approach.</p> <p>The removal of the anthropogenic debris located in the Significant Woodlands (deer stands, blinds, wildlife camera, etc.) will be a condition of draft plan approval if this application gets approved.</p> <p>The legend on Map 2 only identifies the 30m Normalized Wetland Buffer. It would also be useful if it included the other buffers identified in the report. For example, the green solid and dashed lines around Block 6 and Allendale Creek aren't included in the legend.</p>	<p>Map 1 of the EIS Addendum shows the Significant Woodland boundary and the Normalized 10m Setback. The setbacks range between 6.2m and 17m. These minimum and maximum buffer widths are shown on Map 1. The majority of the buffer remains 10m or more from the delineated woodland dripline.</p> <p>The revised Draft Plan mapping shown on Map 1 now includes reference to all woodland and wetland boundary lines and buffers.</p>
<p>Section 5.5.2 indicates that ALL 1, ALL 2 and ALL 3 are shown on Map 2 when they are shown only on Map 3. These segments would also be useful on Map 2 in relation to the 30 metre setbacks for Allendale Creek, which should also be labeled on Map 2.</p>	<p>The 30m watercourse setback for the main stem of Allendale Creek is now shown on Map 1 of the EIS Addendum. HDFs line segments ALL1, ALL2, and ALL3 are now also shown for context on Map 1 (without labels, for simplicity).</p>
<p>The EIS proposes to remove the Cultural Woodland along Allendale Creek, which was identified as a Supporting Environmental Feature in the MESP with a 10 metre buffer, in order to accommodate SWM. Supporting Environmental Features (or Locally Significant Natural Areas as defined in the Cambridge Official Plan), are features that do not meet the criteria for provincial or regional significance but still play an important role in maintaining ecological functions provided by the Greenlands Network. Policy 3.A.4.3 in the Cambridge Official Plan (2012) states:</p> <p>"Development and site alteration will avoid LSNAs where feasible. Development or site alteration proposed within or contiguous to a LSNA will require an Environmental Impact Statement. The determination of boundaries and buffers will be done through this study and it must show to the satisfaction of the City that the</p>	<p>Yes, the intent is to enhance the hydrologic function along the corridor through the use of swales providing flow conveyance and natural infiltration of runoff. The revised enhancement recommendations provided in the EIS Addendum include the removal of household debris from the portion of the creek corridor that will remain post-development (see Section 3.2).</p>

<p>ecological function of the LSNA will be maintained, enhanced or where feasible, restored.”</p> <p>The EIS indicates this woodland has been historically disturbed and the understory is dominated by European Buckthorn. The EIS proposes that the function of the woodland will be re-created with restoration plantings and generally enhanced by the incorporation of the 50m wide wildlife movement corridor. This approach is generally acceptable and meets the intent of the policy.</p> <p>The EIS also indicates that there is evidence of historical tile drains and other drainage alterations, rock piles and household debris in this area. Is the intent also to restore and enhance hydrologic function along this corridor?</p>	
<p>The recommendation in the EIS to transplant Common Hackberry, a regionally rare species, <10cm DBH from the eastern portion of the CUW community will be a condition of draft plan approval.</p>	Noted
<p>The recommendation in the EIS to transplant Moonseed, a regionally rare species, from the north side of the CUW community to appropriate habitat on site where development is not proposed will be a condition of draft plan approval</p>	Noted
<p>The MESP identified a 50 metre wide east-west wildlife movement corridor/ linkage that is to be restored/rehabilitated between the Maple Grove Wetland Complex, natural features associated with Allendale Creek and the Grand River. I acknowledge that the 50 metre corridor has been proposed however, the EIS largely speaks to the corridor being used for stormwater management purposes as opposed to its primary intended use as a wildlife movement corridor. While the details of the corridor are proposed to be refined through detailed design, this is a major component of the MESP and further details are required at this point in time in order to confirm the function of the wildlife corridor, first and foremost, with stormwater management. Please provide further details of the wildlife corridor with respect to grades</p>	<p>Section 3.2 of the EIS Addendum provides additional details on the wildlife corridor. A conceptual cross-section schematic has also been developed (Appendix III).</p>

<p>with a preliminary profile and more details on the wildlife corridor aspect.</p>	
<p>As per the EIS Terms of Reference, the location of trails within and adjacent to the subject property must be reviewed as per Official Plan Amendment No. 35 – Parks and Trails Schedule. It was intended that a trail would run along the wildlife corridor, which should also be included in the additional details requested above on the wildlife movement corridor</p>	<p>The proposed trail network is shown on Map 1 of the EIS Addendum. The wildlife corridor conceptual cross-section in Appendix III shows the location of the trails in relation to the portions of the corridor that are to be naturalized. Section 2.2 discusses the potential impacts to natural features from the trails.</p>
<p>Section 6.4.1 indicates that the proposed development within the subject property will require the removal of 'only 50%' of the flooded field feature identified as Significant Wildlife Habitat in surveys conducted by NRSI. Can the flooded field feature be identified as an outline on Map 3 as opposed to only a point for the monitoring station? Is the other 50% of the flooded field feature located on the parcel to the north? If so, this parcel will also very likely be developed in the future and therefore 100% of this flooded field feature will be impacted. Please provide further clarification.</p>	<p>Map 2 of the EIS Addendum shows the flooded field identified as SWH as a result of field surveys by NRSI biologists in the spring of 2019. Section 2.4 interprets these findings in the context of the overall landscape and discusses impacts associated with future development on adjacent lands.</p>
<p>The following conditions of draft plan approval will be required with respect to habitat removal:</p> <ul style="list-style-type: none"> • To avoid impacts to bats, tree removals must occur between November 1 and March 31, which is the period outside of the active bat season. If tree removals are proposed within active bat season, consultation with the Ministry of the Environment, Conservation and Parks (MECP) will be required and the City and Region should be made aware of any discussions with MECP • To avoid impacts to nesting birds, vegetation clearing must occur between September 1 and March 31 • Prior to the removal of structures (specifically the barns and sheds associated with the farms on site), a nesting survey is required to be completed to confirm the presence/absence of Barn Swallow nests. If nesting habitat for Barn Swallow is identified a permit to remove and compensation for this habitat will be obtained under Ontario Regulation 176/13 	<p>Noted.</p>

<p>The submission of a detailed Natural Feature Buffer Enhancement Plan as identified in the EIS will be required as a condition of draft plan approval to the satisfaction of the City, Region and GRCA. The developer will provide cost estimates and securities to implement this work.</p>	<p>Noted.</p>
<p>As a condition of draft plan approval the developer will enter into an agreement to submit pre, during and post construction monitoring plans as identified in the EIS to the satisfaction of the City, Region and GRCA</p>	<p>Noted.</p>
<p>Heritage Planning - City</p>	
<p>The proposed development will have an adverse impact on two properties listed on the Heritage Register, which would be removed according to the submitted subdivision plan:</p> <ul style="list-style-type: none"> • 250 Allendale Road (bank barn only) • 105 Middle Blocks Road (fieldstone farmhouse and out-buildings) <p>The development abuts another property listed on the Heritage Register:</p> <ul style="list-style-type: none"> • 555 Riverbank Drive (fieldstone farmhouse and bank barn) <p>A Heritage Impact Assessment (HIA) has been prepared for 250 Allendale Road. It was reviewed by the Municipal Heritage Advisory Committee (MHAC) in August 2019, with this recommendation for Council:</p> <ul style="list-style-type: none"> • THAT the Municipal Heritage Advisory Committee (MHAC) accept the revised Cultural Heritage Impact Assessment (HIA) and its findings as submitted by MHBC Planning Ltd. dated August 8, 2019 for the development proposed for the listed property at 250 Allendale Road; 	<p>The boundary of the Draft Plan has been revised such that 105 Middle Block Road is no longer within the limits of the Plan.</p> <p>The requirement for a conservation plan for 250 Allendale Road can be addressed through an appropriately worded condition of Draft Plan approval.</p>

- AND THAT the MHAC recommends that the property owner prepare a conservation plan that identifies how the barn will be dismantled and rebuilt or a salvage plan that will identify which items will be salvaged, how and where they will be stored, where they will be reused on site and/or donated, and an interpretation plan to ensure their origins and value is understood well into the future;
- AND THAT the conservation or salvage plan be a condition of a future development application for the subject lands;
- AND FURTHER THAT the MHAC recommends that Council direct staff to remove the property from the Heritage Properties Register after demolition of the structures on the property.

A conservation plan has not yet been submitted.

Note that the referenced HIA includes a map on the page following page 45 that has errors: The parcel identified as 250 Allendale Road includes the actual 105 Middle Block Road, and the parcel identified as 105 Middle Block Road is actually part of 250 Allendale Road. Otherwise the information in this HIA is about the actual 250 Allendale Road and has no information about 105 Middle Block Road.

A HIA for 105 Middle Block Road will be required; it will need to reference the adjacent heritage properties of 555 Riverbank Road and 250 Allendale Road (with the approved HIA).

Further action will be for staff to review the new HIA and possibly request revisions, then prepare a report for MHAC to receive the report and recommend further steps to Planning and Development Committee and Council. During the COVID emergency period, Planning and Development Committee meetings are not being held, only special Council meetings. Demolition of Register-listed properties requires the opportunity for Council to consider their removal, after review by MHAC.

Engineering Services - City	
The documents (listed above) reference the subdivision as being both iPort and IP Park Phase 3. Please be consistent with the name of the subdivision.	The land is formerly known as IP Park Phase 3, clarification has been added to the report. The only remaining references refer to supporting documentation that were prepared before the name change and thus, are titled accordingly.
As the status of the future residential and park lands proposed by your client is still to be decided as they are currently located outside of the City's urban boundary, please remove all references to these lands from the FSR and the SWM report: <ul style="list-style-type: none"> Water and sanitary cannot be provided at this time to those blocks and in the future servicing will not be from Allendale Road as no watermain or sanitary sewer will be constructed west of Intermarket Road; 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; 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. 	Removed references to the additional lands, except for model parameters table. Not including the additional lands within the model would result in an inaccurate model of the entire system. The proposed Park is now located to the northeast, within the limits of the Draft Plan. <ul style="list-style-type: none"> Noted References will be removed, however to be accurate, these lands will remain in the SWM modeling and results
In both the FSR and SWM report, lands outside of the draft plan should be labeled as other lands owned by applicant	Revised – lands outside the Draft Plan are so labelled, as appropriate.
The SWM block should be separate from Block 5 (Open Space)	The Open Space Block is noted as Block 6, separate from the proposed SWM facility, which is identified as a separate Block (Block 7), west of Intermarket Road.
Functional Servicing Report	
Section 4.1 and Figure 4 – The Intermarket road cross section should be consistent with the cross section through Intermarket's IP Park Phase 2. Please revise	Revised
Section 5.1 – Hespeler West watershed should be subwatershed.	Revised
Section 6.1.1 – Please revise this section based on the Intermarket Road Sanitary Trunk Sewer design drawings and design brief	Revised

<p>Section 6.1.2</p> <ul style="list-style-type: none"> • Please refer to City of Cambridge Engineering Standards and Development Manual for depth of cover requirements. • “In the event that the blocks are severed, additional” is stated but appears to be incomplete. Please revise 	<p>Revised</p>
<p>Section 6.1.3 – This section appears to cover the same topic as in Section 6.1.2. Please review</p>	<p>Section 6.1.2 details the laterals to the sewer, 6.1.3 details the collector sewer itself.</p>
<p>Section 6.2</p> <ul style="list-style-type: none"> • The proposed watermain will also connect to the 300mm dia watermain on Allendale Road which will be constructed this year and in the future Middle Block Road. Please revise. • The watermain distribution analysis has already been provided and approved. Please revise. • Table 6-2 – Please confirm this in accordance with the approved water distribution report for IP Park Phase 1, 2 and 3 and make direct reference to the report. • It is stated that the proposed 300mm dia watermain in Intermarket Road is capable of supplying fire flows up to 353 L/s, however a number of required fire flows from Table 6-3 exceed this amount. Additionally, fire flow is what can be supplied at 140 kPa, not at standard operating pressures. And please provide fire flow (FUS) + max day flow. Please confirm the flows are in accordance with the water distribution report. • Please remove references to the future residential block. Fire hydrants on Intermarket Road are to be laid out based on the spacing required in an industrial subdivision. 	<ul style="list-style-type: none"> • Revised • Revised • Revised • Calculations have been revised and only Block 3 exceeds this amount. As clarified in the report, this building will either need to be smaller or have a pump installed. As these flows are based on a conceptual layout, they will be reviewed as required at the site plan stage • Removed
<p>Section 6.2.1 – Please provide calculations supporting the need for 250mm dia services to each block</p>	<p>Revised to 200 mm, to be consistent with Phase 2 design</p>
<p>Section 7 – Cambridge and North Dumfries Hydro is known as Energy+, please revise</p>	<p>Revised</p>
<p>Section 8</p> <ul style="list-style-type: none"> • There appears to be an issue with formatting in this section. Please review. 	<ul style="list-style-type: none"> • The bullet points are intended. Revised introductory sentence • Revised

<ul style="list-style-type: none"> The temporary sewage pumping station is not technically temporary. It is anticipated to be in place for at least 20 years 	
<p>Sanitary Sewer Design Sheet</p> <ul style="list-style-type: none"> Please also refer to comments for Drawing SAN-01. The lengths shown for all lengths of sewer are inconsistent with the servicing plan. Please revise. Maximum MH spacing is 90m for 200mm to 450mm dia sewers. Please revise. Inspection MHs are to be placed adjacent to P/L. Please revise. Block 2 is listed on sheet 5 times with the same area. Please revise. Catchment Area 303 is listed as Intermarket Road and as Block 3. Please review and revise. Confirm that pipe data is consistent with servicing plan. Sanitary services cannot be provided at this time for the future residential block. Additionally, the block should be serviced from Intermarket Road as no services will be provided west of Intermarket Road on Allendale Road. Please ensure that I/I contributions from Intermarket Road are reflected in the design sheet. Catchment Area 308 is identified as being from "additional lands", however on the Drawing SAN-01 label is for Intermarket Road and for the future residential development. Please revise design sheet and Drawing SAN-01. 	<ul style="list-style-type: none"> Noted Revised Revised Revised It is not yet known where the service connection to this block will be located. Therefore, multiple laterals are proposed. In order to be conservative, the entire Block area has been attributed to each lateral to confirm the sizing is adequate Revised Revised Noted. However, as per other comments, this area is not in the sanitary calculations Sanitary subcatchments have been revised to include the roadway This area has been removed from design sheet as per other comments
<p>Stormwater Management Report</p>	
<p>Section 4.1</p> <ul style="list-style-type: none"> It is noted that Table 5.5 in the ESL Stage 1 MESP MDP also makes reference to a flood control target for 100 year of 458 m³/ha. Please review. The proposed subdivision resides within multiple subwatersheds, each with their own infiltration requirements. Please refer to Table 4.8 in the MDP and revise this section and Section 4.10. 	<ul style="list-style-type: none"> Flood control target is not applicable since the pond does not discharge into Allendale Creek. However, the targets have been added to the report This has been revised
<p>Section 4.4</p>	<ul style="list-style-type: none"> Further details have been added to the report

<ul style="list-style-type: none"> • Please provide a discussion about how the lands currently and in the future drain to the Grand River. • It is noted that the culvert which crosses Riverbank Drive may represent a restriction to flow during larger events and as a result may govern over the allowable release rates outlined in Table 4-3. Please review and revise. • Table 4-3 – Please reference the critical discharge rate to Allendale Creek. 	<ul style="list-style-type: none"> • Calculation included in the report • Added to Table 4-3
<p>Section 4.5</p> <ul style="list-style-type: none"> • Table 4-6 - Please reference the critical discharge rate to Allendale Creek. • Table 4-6 – NHYD₃₂₈ for Hazel in OTTHYMO model is stated as 15.07cms. Please revise 	<ul style="list-style-type: none"> • The pond does not outlet to Allendale Creek and therefore this value does not apply to the flows draining to The Grand River (now Table 4-5). However, the critical discharge value to Allendale Creek is now mentioned in the report. • Revised (now Table 4-5)
<p>Section 4.6</p> <p>a. It is noted that all lands west of Intermarket Road are not zoned for the proposed uses. The following should be noted:</p> <ul style="list-style-type: none"> • If these lands are not rezoned at this time, an interim SWM facility/block will be required in the draft plan, east of Intermarket Road. • Should the applicant wish to pursue an interim SWM facility, it is suggested that the block be located at the northeast corner of the wildlife corridor and Intermarket Road. It is assumed this block would be an interim condition and the land could be returned to the adjacent block. • As the interim SWM facility is not permanent, the City will not take ownership of the block <p>b. Please note that the status of ownership of the land at the outlet to the existing culvert under Riverbank Drive needs to be reviewed.</p>	<p>The lands west of Intermarket Road have been removed from the Draft Plan, save for the Open Space Block and SWM Facility Block, both of which will be dedicated to the City. The SWM facility is proposed on lands within and partially outside the urban boundary, per previous discussions with City and Regional staff. The facility would be dedicated to the City, in the same manner as other SWM facilities, and as such, would become a municipal facility, which is a permitted use.</p> <p>An interim facility is not proposed.</p>
<p>Section 4.7.1.2 – It should be noted that there is a critical erosion discharge value for Allendale Creek. Please review</p>	<p>The pond does not outlet to Allendale Creek and therefore this value does not apply to the flows draining to The Grand River. However, the</p>

	critical discharge value to Allendale Creek is now mentioned in the report.
Section 4.7.1.4 – Table 4-7 – The storage and controlled flow values are inconsistent with OTTHYMO output. Please revise	Table (now Table 4-8) has been revised
Section 4.9.1 – In accordance with City standards, minimum velocity is 0.8m/s and maximum velocity is 3.0m/s	Revised to be min 0.8m/s and 6.0 m/s (except for last reach with is max 3.5m/s) as per City Stds. Velocities in sanitary sewers shall not be greater than 3 m/s as per City standards
Sections 4.11.1 and 4.11.2 – Please indicate how 25mm was determined to maintain base flow to the PSW and to Allendale Creek. Please refer to MESP MDP Table 5.5 for recommendations. As well, please indicate how base flows will be provided directly to Allendale Creek if the majority of storm flows are supposed to be conveyed to the SWM pond.	The 25mm storm was chosen to be conservative. Since baseflow is calculated as the 7-day low flow that occurs on an average once in 2 years or has a 50% chance of occurring in any given year. This information is currently not available. Note that Table 5.5 does not include baseflow. However, groundwater recharge (infiltration) volume is maintained as per Table 5.5.
Section 4.11.2 – More area drains under pre-development conditions to Allendale Creek than is shown in Area 401 on Drawing SWM-04. Please review and revise	These areas are based on the contours from the topographic survey. Note that only the area contributing to the upstream portion of Allendale creek is considered
Section 4.12.1 – It is noted that the individual wildlife corridor cells each offer detention storage. Please indicate if this will prevent wildlife from using the corridor. As well, due to each cell providing its own detention storage and all being in series, indicate if tailwater conditions are created thereby limiting the effectiveness of the middle and east cells to act as detention storage. Please revise the OTTHYMO model as needed. Please indicate if there are any other benefits being provided by the cells from a quality or water balance perspective.	Refer to NRSI's report for more information about the effect of the SWM channel on wildlife travel. Due to the change in elevation, it is not expected that tailwater conditions will affect the detention storage. Although not specifically designed as such, the landscaping in the channel will provide some quality benefits.
Section 5 – The first bullet point lists NCBP, MCEA and MESP. It is assumed that it should read NCBP MCEA. Please revise.	This bullet has been revised

<p>Appendix F</p> <p>a. Storm Water Quality & Permanent Pool Volume - Based on MOE SWM Planning and Design Manual Table 3.2, an imperviousness of 82.31% would equate to a total volume required of 245.5 m³/ha (205.5 m³/ha for permanent pool and 40m³/ha for extended detention). Please review and revise.</p> <p>b. Hydraulic Calculation Sheet Pond Storage Stage Discharge Calculations – Volumes and Total Outflow for each storm event does not match OTTHYMO output.</p> <p>c. Storm Sewer Design Sheet:</p> <ul style="list-style-type: none"> • Please use the City’s IDF curve data for the design of the storm sewer system; • Maximum MH spacing is 90m for 600mm dia sewers and smaller and 130m for 600mm dia sewers and larger. Please revise. • In accordance with City standards, minimum velocity is 0.8m/s and maximum velocity is 3.5m/s. Please revise. • Area 3009 – Intermarket Road in IP Park Phase 2 has been assessed at a higher % imperviousness and should be essentially the same cross section. Please review. • Please confirm that Areas 3012H and 3012G are the same size 	<p>a) The total % impervious has changed. This comment no longer applies</p> <p>b) This table has been revised</p> <p>c) –</p> <ul style="list-style-type: none"> • Revised • Revised • Velocities have been updated. The maximum velocity is 6m/s except for the last reach as per City standards • Revised • These areas have been revised
<p>Drawing SWM-01 – Based on City contour mapping it appears that Banat Road may actually be the dividing line between Area 102 and the existing residential area</p>	<p>SWM-01 only considers areas within the subject property</p>
<p>Drawing SWM-02 – Considering the relatively flat grading of the subdivision, please confirm the following:</p> <ul style="list-style-type: none"> • The area fronting Allendale Road in Area 3003 can to be drained to the west wildlife corridor cell. • The farthest southwest building in Area 3002 in Block 2 can be drained to middle-wildlife corridor cell. • The area fronting Middle Block Road in Area 3005 in Block 3 can be drained to the west wildlife corridor cell 	<ul style="list-style-type: none"> • Grading has been modified. No longer applicable • Grading has been modified. No longer applicable • Grading has been modified. No longer applicable

<p>Drawing SWM-03</p> <ul style="list-style-type: none"> • Pond Control STR - the W invert is higher than the E invert. Please revise. • MHO4 – Between the W invert and the S invert should match obverts or the S obvert should be higher than the W obvert. Please revise. • MHO6 – The N invert is higher than the S invert. Please revise 	<ul style="list-style-type: none"> • Revised • Revised • Revised
<p>Drawing SAN-01</p> <ul style="list-style-type: none"> • The majority of catchment area labels have the same peak flow rate. Please revise. • A catchment area label has been given to Block 5 (Park) and has not been shown on the sanitary design sheet, please confirm if the block will generate any sanitary flow that will be conveyed to Intermarket Road. • Label all sanitary sewer lengths • The first length of trunk sewer is missing north of Allendale Road and the trunk sewer is missing south of Allendale Road. • Catchment Areas 307 is not included on the sanitary sewer design sheet. Please ensure that I/I generated by Intermarket Road is accounted for. • Block 9S will be serviced from Intermarket Road as no sanitary or watermain will be provided on Allendale Road west of Intermarket Road. Please revise all drawings to suit. • The location of sanitary services for Block 2 will need to be coordinated with the City's Allendale Road Reconstruction project. 	<ul style="list-style-type: none"> • Peak flow rate is based on usage (all industrial) • This label has been removed • Revised • Revised • Sanitary subcatchments have been revised to include the roadway • Revised • Noted. Coordination has occurred
<p>Drawing SG-01</p> <ul style="list-style-type: none"> • Provide a preliminary road profile for Intermarket Road. Please note that in accordance with City standards, minimum C/L grade is 0.5%. • Please remove driveways from plans. This detail will be addressed at the individual block site plan stage. 	<ul style="list-style-type: none"> • Included with this resubmission • Revised • Confirmed • Revised • Confirmed • Revised • No longer applicable

- Block 1 – There is very little fall from east to west to the wildlife corridor. Please confirm if the block will be able to drain as noted.
- Block 2 – A number of grades along the south buildings are obscured by other grades.
- Block 3 – The grades at the farthest northeast limits of the property are very flat. Please confirm if the area will be able to be drained to the east wildlife corridor cell.
- Block 4 – A number of grades at the southeast corner of the south building are obscured by other grades.
- Block 4 – The grades at the west limits of the property are lower than Intermarket Road. Please confirm how the block will drain to Intermarket Road.
- Block 4 – A number of grades are obscured by other grades and an overland flow arrow.
 - a. Block 9 – The drainage/servicing easement provided for the future residential development to the west cannot be shown or provided at this time. Any servicing or easement will need to be determined at the site plan application stage. Please remove from all drawings.
 - b. Block 9 – The grades at the west limits of the property (both areas) are lower than Intermarket Road. Please confirm how the block will drain to Intermarket Road.
 - c. Please provide additional grades as it is necessary to fully outline how each block will drain to their respective outlets.
 - d. Please provide additional grades and a preliminary profile through the three cells of the wildlife corridor including anticipated detention storage depths, etc.

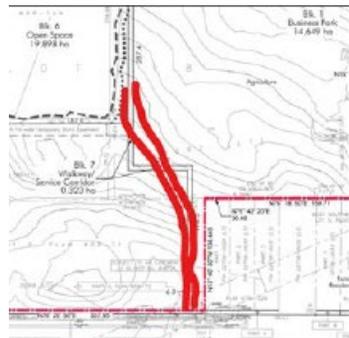
- Revised
- Revised
- No longer applicable
- Revised
- See PND-02
- Noted
- The sewer pipe has been designed for the 100-year controlled flow from the roofs and SWM corridor, therefore there is unlikely to be any overland flow up to the 100-year storm event
- Provided

<p>e. Please coordinate grading and servicing design with the City's Allendale Road Reconstruction project and update all drawings as necessary.</p> <p>f. Overland flow is being shown as entering the forebay of the proposed SWM pond. This has the potential to stir up sediment. Please indicate how this will be addressed.</p> <p>g. Provide preliminary grades for the SWM pond outlet ditch to Allendale Creek</p>	
<p>Drawing SS-01</p> <ul style="list-style-type: none"> • Proposed water service connections are to be capped at P/L. • Provide sanitary and storm inverts and top of structure elevations at MHs. • Provide storm inverts for wildlife corridor cells. • As part of the City's Allendale Road Reconstruction project, please confirm the location of service connections and show all services in Allendale Road. • Please label all MHs. • Show the sanitary trunk sewer in IP Park Phase 2. • The first length of trunk sewer is missing north of Allendale Road. • As noted previously, no watermain or sanitary sewer will be provided west of Intermarket Road on Allendale Road and no services will be provided at this time for the future residential block. • A sewer is shown embedded in the south berm of the proposed SWM pond which outlets just downstream of Intermarket Road. Please identify and indicate its intent. • Refer to City record drawing A492-14 for as recorded River Bank Drive culvert inverts 	<ul style="list-style-type: none"> • Revised • Noted. No services are proposed • This sewer is to provide base flow to Allendale Creek. Design will be provided at the detailed design stage • Revised
<p>Drawing PND-01</p> <ul style="list-style-type: none"> • Section C is inconsistent with plan view. Please revise. 	<ul style="list-style-type: none"> • Revised • This sewer is to convey baseflow to Allendale Creek. Details to be provided at detailed design stage

<ul style="list-style-type: none"> • Indicate how the proposed 200mm storm embedded in the south berm of the SWM pond is collecting and conveying flow to the Allendale Creek. • Indicate groundwater elevation on the appropriate section 	
Transportation Services	
The documents reference the subdivision in multiple ways, please be consistent with the name of the subdivision.	The development is referenced as iPort Cambridge.
Update the road names to reflect the finalized naming convention; Boychuk Drive: Maple Grove Road to King Street and Intermarket Road: Middle Block Road to Boychuk Drive	The road names were changed in the updated August 2020 TIS provided to City and Regional staff
In Section 2.1 Boychuk Drive is identified as an existing road with a 35km/h speed limit, it should be clarified that this is a private driveway which is being replaced with Boychuk Drive a public roadway with a 50km/h speed limit	The change was included in the updated August 2020 TIS provided to the City and Region
Section 2.1 also identifies King Street as a predominantly 4 lane road whereas it is predominantly a 2 lane road	The change was included in the updated August 2020 TIS provided to the City and Region
The Region of Waterloo has identified that King Street will be reduced to 2 lanes in advance of the intersection of Boychuk Drive, this must be reflected in the intersection analysis	The Region of Waterloo and City of Cambridge are currently co-ordinating the design of the Boychuk Drive connection to King Street as part of the reconstruction of King Street. Paradigm has provided input into the design work based on traffic projections in the March 2020 TIS.
City Parks	
Block 7 depicts a 6m wide walkway/service corridor block running from Allendale Road to the east side of the Block 6 Open Space. It is approximately 15m from the existing residential lot to the east (suggesting a laneway/vehicular access from Allendale to Block 1). This implements Schedule 7 of OPA 35 for providing a connection from Allendale Road northward to the natural open space blocks. It is suggested that this walkway not be fenced – this is contrary to City policy requiring fencing of blocks to come into City ownership with no gates permitted. However, fencing this walkway would create both CPTED/safety issues (i.e. long fenced corridor with no exits), connectivity issues (i.e. only way to enter is through specific points such as at Allendale Road), and it is anticipated that vehicles would also	<p>Block 8 has been moved further to the west. The separation distance is now 37.5 metres from the nearest residential lot.</p> <p>The requirement (or non-requirement) for fencing and the submission of a trails plan can be addressed as a condition of draft plan approval. We have reviewed the design of Block 8 and can confirm that municipal maintenance vehicles will be able to make the turning movements. The Block has been smoothed out near the corners to allow for easier movements.</p>

use this corridor and would have difficulty navigating 90 degree turns as per the block's configuration. Finally, the walkway/service corridor exists within the 30m setback approximately 15m from the nearest existing residence to the east. Screening plantings should be provided upon a Landscape Plan submission between the walkway and property boundary (and it appears that the Urban Design Brief features a 7m planting area around the existing residential as well as 2.4m noise wall which would address this comment). Further, the conditions of approval will require a trails plan. This particular segment should be designed, as noted above, without fencing (and the required Fence Plan will also not show a fence for this block), raised in terms of grade, and with other landscaping (e.g. shrubs, trees) to both delineate the walkway from surrounding lands and keep pedestrians within the corridor. PRCD is open to other design suggestions (including fencing on one side or the other, or alternating fencing from one side then the other, if security of adjacent blocks is also a concern) and this should be explored in subsequent detailed design submissions (i.e. Landscape Plan, Trails Plan). Finally, the block should be modified to eliminate 90 degree angles

To shorten the access for both CPTED/ pedestrian and vehicle/turning safety, the Draft Plan should modify the 90 degree turns and smooth the block as indicated in the markup:



Block 5, Open Space, Future Park, 3.775 hectares – this block is proposed for a park and is currently not vegetated with a row of trees

As noted above, the turning movement has been evaluated and the Block has been smoothed out at the 90 degree turns.

As per discussions with City staff, a Park Block (Block 4) is now proposed in the City's preferred location, on the eastern portion of the site's frontage on Middle Block Road.

and abutting communications tower block and stormwater block proposed to the south

The Planning Justification Report (page 6) and Urban Design Brief (page 9) notes "There is potential for a neighbourhood park on the future development lands near the corner of Riverbank Drive and Middle Block Road. Fulfilment of the park land dedication requirements is proposed to be through the dedication of parkland in this location or through cash-in-lieu or a combination of both."

The quantity of lands proposed for park is not provided in any document nor the Draft Plan but is estimated to be approximately ~1.15 ha (green dashed area on the Draft Plan snip below) and approximately ~0.33 ha of this is wooded with a steep slope (i.e. not acceptable as parkland as per Chapter Official Plan policies and criteria for "developable lands" for parks).



The block is "combined" with stormwater management and a "future stormwater management" notation on the Draft Plan. Combination of parkland blocks and stormwater management blocks is contrary to the Official Plan/parkland dedication policies. The City does not accept a park combined with a stormwater pond.

Based on discussions with City staff, and modifications to the limits of the Draft Plan, we understand Block 4 satisfies the parkland dedication requirement.

<p>The amount of parkland required is 2% as per the Official Plan and Planning Act and is further defined by OPA 35. The full dedication in land is required and no cash-in-lieu, nor appraisal is required. The total amount of parkland (using a "net environmental" 2% of developable lands calculation) is 116.041 hectares total lands – environmental (19.898 hectares) = 96.143 hectares X 2% = 1.923 hectares.</p>	
<p>The proposed park block is not consistent with the more central locations adjacent to the natural areas depicted in Schedule 7 of the Official Plan amendment 35 (OPA 35). The proposed park block is not accepted. It is recommended that the "park" portion of Block 5 be returned to Block 4 developable lands or remain as part of Block 5 – stormwater management pond.</p> <p>Returning to OPA 35, during consultation the southern-most park locations/stars on the Schedule were not well received by the residents who attended. The rationale for the proposed location behind the residential area was as a buffer but this location would not have any frontage and would only have surveillance from backyards. Out of the two remaining locations, the Middle Block Road location is preferable to Allendale Road and would involve less reduction in yield. The preliminary program would be for a passive park with open area, picnic shelter, parking lot and seating opportunities and mainly serve the daytime lunch user, and summer evening staff picnic users as a drive-to location but also accessible by the trail system as a destination (and so may also offer adult fitness or other appropriate activities). Ultimate program will depend on development charge financing and site conditions.</p>	<p>As discussed with City staff, the Park Block has been relocated to the City's preferred location. The City will have the ability to program the Park.</p>



"Future Park" and "Open Space" need to be removed as references and the Block should be renamed "Block 5 – Stormwater Management"

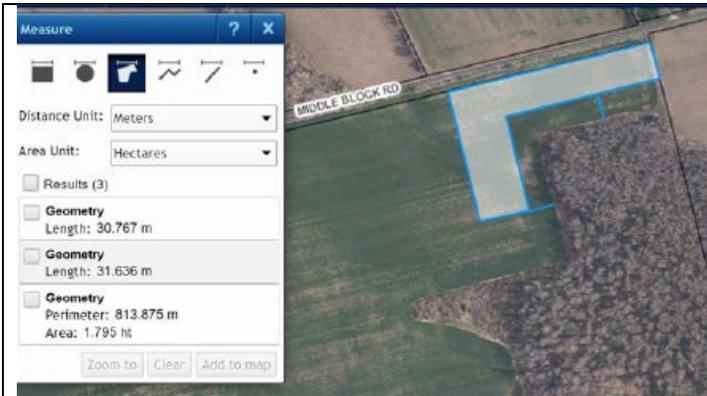
Lands west of Intermarket Road have been removed from the Draft Plan, save for the Open Space Block and SWM Facility Block, both of which will be dedicated to the City. The Park Block is located in the northeastern portion of the site and is not combine with any other Block.

The lands earmarked for Future Park within the urban boundary should be added to Block 4 (or could remain as Block 5 SWM if SWM is anticipated in these lands)

As discussed with City staff, the Park Block has been relocated to the City's preferred location

A park block, consistent with OPA 35 proposed locations and consisting of a maximum 1.923 hectares needs to be created on the Draft Plan as "Block X – Park". The preferred location for this additional block is as shown below in the airphoto snip fronting on to Middle Block Road. It does not overlap nor include OS lands and the 30m buffer associated with Block 6. The example provided below is approximately 1.795 hectares as noted in the snip for illustration purposes and this should be represented on the Draft Plan as a block 1.923 hectares in size. The illustration below also measured 30m setbacks.

As discussed with City staff, the Park Block has been relocated to the City's preferred location, and we understand that the size of the Park Block satisfies the required dedication, as per the Planning Act.



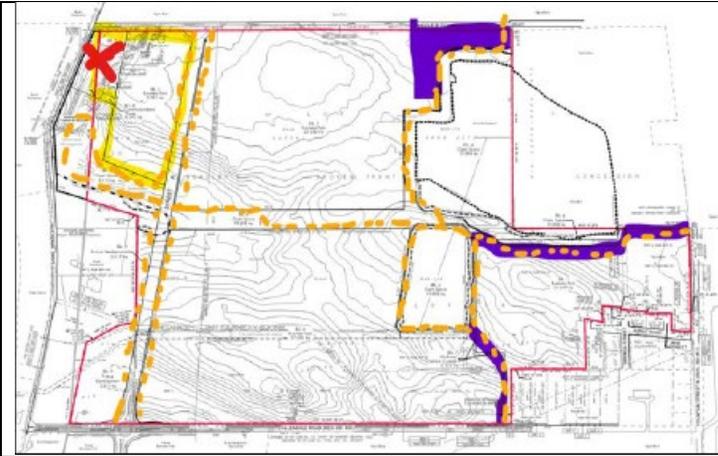
The Trail/Active Transportation Network is required to be depicted on the Draft Plan as a dashed beige- or brown-coloured line and should include associated active transportation network elements (i.e. Street A Multi-use Trail) and SWM access

The requirement for a Trails Plan can be addressed as a condition of Draft Plan approval. It is not typical to illustrate trails on Draft Plans. Blocks that are intended to accommodate trails are noted as "Walkway". The remainder of the trail locations will be identified on the Trails Plan.

A markup of the Draft Plan is provided below with a summary of all of the above-noted required changes:

- Removing reference to "Future Park" from the SWM Block;
- Returning the "Future Park" lands to the adjacent block for development;
- Add a dashed line which depicts the active transportation network
- Add a Park Block abutting Middle Block Road
- Add a Trail Walkway Block connecting Fountain Street North to the trails system/OS Block (This is in a separate point below in Comment #3 as well); and
- Eliminate the 90 degree turns of the Block 7 Service/Walkway Corridor

- The Park has been relocated and identified as its own Block (Block 4)
- See above
- The identification of trails on a Draft Plan is not typical. Preference is to require the submission of a Trails Plan as a condition of Draft Plan approval
- Park Block 4 abuts Middle Block Road
- Walkway Block 9 provides a connection from Fountain Street to the future trails system
- The turns have been smoothed out within Block 8



Block 8 Communications Tower currently has an access that runs to the south. Given the SWM Block the access is proposed to be re-routed to the north to Middle Block Road (through/on the periphery of the proposed park area). OPA 35 contemplates an east-west trail from Fountain Street North to Riverbank Drive (see snip below, red circle is the east-west corridor and blue circle the area within SWM Block 5 for the trail; the north-south component was to proceed through an Multi-use trail on the road, from Allendale Road northward to Middle Block Road through the Block 7 Service Corridor and OS, and from the trail northward to Middle Block Road adjacent to the abutting property (outside of the subject site/for future completion by others)).



The communications tower is located outside the limits of the revised Draft Plan. A future east-west trail link from Intermarket Road can be considered within Block 6 on the revised Draft Plan and identified on a future Trails Plan, as appropriate.

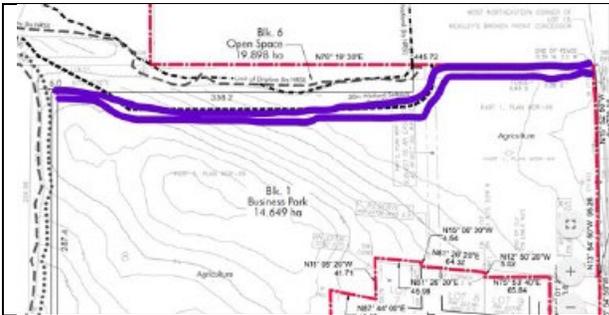
This photo below looks northward on Riverbank Drive where it meets Allendale Creek (blue-hashed colouring depicts location of creek). A SWM access north of here would complete the trail network as per OPA 35.



The lands west of Intermarket Road are located outside the limits of the Draft Plan, save for the Open Space Block and SWM Facility Block, both of which will be dedicated to the City.

However, as can be seen in the photo the cross section of Riverbank Drive does not offer any room for continuing the trail neither as a bike lane nor Multi-Use Trail (MUT) and it is unknown (and unlikely) whether future road improvements to Riverbank Drive will provide an MUT. Furthermore, the slopes begin to increase as one travels northward on Riverbank Drive making an AODA-compliant trail expensive and/or not feasible. Dead ends in the trail network are acceptable if future plans provide some indication of potential continuation but that is not the case here. Finally, the Functional Servicing Study (SG-01, page 36 of 39, Site Grading Plan, see snip below) shows no SWM access to Riverbank Drive (see blue line/SWM access, green line is the MUT along the road as well as the road profile snip below and yellow line is the pedestrian walkway within the central OS corridor). The trail network should therefore be depicted on the Draft Plan (dashed line) to not have an outlet onto Riverbank Drive as per OPA 35 (and this is reflected in the proposed changes to the Draft Plan in Comment #2 above).

The future Trails Plan will illustrate the location of all of the proposed trails within the limits of the Draft Plan. It is not typical to illustrate conceptual trails on a Draft Plan.



A trails plan consists of the Trail Concept, Engineering/grading plan, and any relevant details and landscaping upon Landscape submissions. A trails plan will be required to implement OPA 35. The Trail Concept will be completed by the Draft Plan (dashed line). The Engineering/grading plan will comply with AODA requirements and depict slopes along the trail and any infrastructure (e.g. retaining walls, ramps, rest areas, boardwalk, etc.). The Landscape submission will feature fixtures (benches, plantings, wayfinding bollard, etc.). Consultation is mandatory with both the Accessibility Advisory Committee and Cambridge Cycling and Trails Advisory Committee once the engineering sheets have been completed and accepted by PRCD. Consultation may necessitate changes to plans. The plans should incorporate all elements of the active transportation network and seamlessly transition between SWM pond access, pedestrian refuges and the MUT on Street A, pedestrian walkways in the environmental corridor, paths in the park block, and the Servicing Road. OPA 35 notes “a development charge will finance the trail”; however, the City’s Development Charge by-law (May 2019) removed trails from development charges (except paths within parks which are part of the outdoor recreation/parks construction development charge) therefore the developer will finance the trail construction. The City’s Local Service Policy (within the Development Charges By-law) defines trails as part of the transportation network and the responsibility of the developer to finance, design and construct.

The requirement for the Trails Plan can be addressed through a condition of Draft Plan approval, with the City having final approval of the Plan. The requirements/contents of the Trails Plan can be confirmed with City staff.

<p>Modifications are noted above (i.e. addition of walkway service block to continue Block 7 to Fountain Street North, dashed line on Draft Plan, modifying Block 7 so that it contains no 90 degree angles, addition of park block to provide trail connections to Middle Block Rd</p>	<p>See previous responses. The revised Draft Plan accommodates the planned trails network contemplated in OPA 35.</p>
<p>The Urban Design Brief mentions two gateways (page 11). These entry features should be designed and located on private property and not within the right-of-way or other City-owned properties. The Urban Design Brief confirms that these features will be located on private property blocks.</p>	<p>Noted – the intent is to consider and advance the gateway components through future Site Plan applications. The gateway features may be part of building and/or landscape design. The intention is located any such components on private property.</p>
<p>The Planning Justification report does not reference OPA 35</p>	<p>The Planning Justification Report has been revised to address OPA 35</p>
<p>In total, 1,120 trees were inventoried, including 39 species. Of the 1,120 trees, 1044 (93%) are native species and 76 (7%) are non-native. 752 trees are proposed to be removed including 300 in poor health. The remaining 452 trees require removal based on the extent of anticipated site grading. Trees off-property, or located near the property boundary, will require written permission by all applicable landowners prior to any proposed removal or root zone impacts. Once the development limits have been confirmed through agency approval, the extent of tree removals will be updated accordingly and the compensation amount determined at that time using the tree by-law tables</p>	<p>Noted- this can be addressed through conditions of Draft Plan approval.</p>
<p>The Tree Management Plan and its recommendations are accepted</p>	<p>Noted.</p>
<p>The applicant will be required to provide a tree by-law permit application as a condition of grading permit. The applicant is advised that Landscape Plans for the private property blocks may reduce/eliminate the Replacement Tree Fund payable arising from the tree removals. Compensation planting must be provided on private lands and not public lands, or lands to come into public ownership, as per the premise of the tree by-law.</p>	<p>Landscape Plans will be required through future Site Plan applications.</p>
<p>No modifications but the applicant must provide a tree by-law permit application, Replacement Tree Fund payment or Landscape Plans for compensation planting, as a condition of grading permit.</p>	<p>See above.</p>

City Fire Department	
<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> <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 issue 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 signs</p>	<p>The width of Intermarket Road is noted on the Draft Plan (30.0 m). Fire trucks will be able to utilize the new municipal road to access Blocks 2 and 3. Block 2 can also be accessed via Allendale Road. Block 1 can be accessed from Fountain Street.</p>
<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>	<p>The requirement for municipal addressing to the City's satisfaction can be addressed as a condition of Draft Plan approval.</p>
<p>Ensure roadways comply with 3.2.5.6. of the Ontario Building Code</p>	<p>Intermarket Road complies with the OBC.</p>
<p>The Ontario Building Code gives a definition for a street as follows:</p> <p>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.</p>	<p>The width of Intermarket Road will not pose any access issues for the City's fire vehicles.</p>

This needs to be kept in mind when widths are determined for the roadways	
Ensure fire hydrants are present and operational	Noted.
Ensure two connections to public thoroughfares if road/cul-de-sac over 100m in length	No cul-de-sac is proposed.
Further review of properties at Site Plan Stage	Acknowledged.

Agency Comments	
Comment	Response
Waterloo Catholic District School Board	
Education Development Charges shall be collected prior to the issuance of a building permit(s).	Noted. No further action required.
Bell Canada	
As a condition of draft plan approval, the Owner/Developer will be required to make arrangements with a telecommunications provider for the provision of any necessary telephone services/infrastructure to this plan.	This comment can be addressed through a standard condition of Draft Plan approval.
Union Gas Limited	
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.	This comment can be addressed through a standard condition of Draft Plan approval.
Energy + Inc.	
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. A minimum of six (6) months is required for determination of servicing needs. 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.	This comment can be addressed through a standard condition of Draft Plan approval.

Canada Post	
The Region will require the Owner/Developer to satisfy Canada Post requirements as a condition of draft approval	The requirements of Canada Post can be addressed through a standard condition of Draft Plan approval.
Regional Comments	
Region – Planning	
<p>The lands east of the proposed Street A are located within the North Cambridge Business Park and are designated in the City of Cambridge Official Plan as Business Industrial and Natural Open Space System with site specific policies 8.10.74 and 8.10.75, approved as part of City OPAs Nos. 29, 30, and 35 (Parks and Trails). 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. Regional staff supports the large business park blocks within the proposed draft plan.</p> <p>In addition, the above City OPAs included policies listing additional study requirements that need to be completed prior to approving a development application on the subject lands. The studies that were submitted in support of the proposed plan of subdivision were evaluated by Regional staff and detailed comments with respect to each study are provided below</p>	Noted.
<p>Lands West of Street A</p> <p>The lands within the draft plan west of the proposed Street A are designated Prime Industrial Strategic Reserve in the City OP and are zoned Agricultural. City of Cambridge OPA and ZBA are required to permit the proposed development on the west side of Street A. The proposed plan includes Business Park Block 4, Open Space Block 5, Communication Tower Block 8 and Future Development Block 9 west of Street A. If the required OPA and ZBA applications are not submitted concurrently with this plan of subdivision application, the lands west of Street A cannot be evaluated and considered at this time</p>	Lands west of Street A (Intermarket Road) have been removed from the limits of the Draft Plan, save for the Open Space Block (Block 6) and SWM Facility Block (Block 7), both of which will be dedicated to the City. The location of the SWM facility was discussed with staff and it was determined that including the facility within the limits of the Draft Plan was preferred by staff, subject to the eventual withdrawal of the related LPAT appeal (as it relates to the SWM facility lands). As such, the facility will be partially within and partially outside of the urban boundary, but will be dedicated to the City as a municipal facility, which is a permitted use.

<p>and should be removed from the draft plan and labelled as “Additional Lands Owned by the Applicant”. The Region will not be able to draft approve a plan that does not conform to the City OP or Zoning By-law. In addition, without the submission of the required OPA and ZBA applications for these lands, any references to these lands in the submitted supporting reports should be removed.</p> <p>Further, the proposed stormwater management facility in Open Space Block 5 extends west onto lands beyond the draft plan limits. These lands are outside the Urban Area boundary and are currently designated in the ROP as Prime Agricultural Area. In addition, these lands are subject to an appeal with the Local Planning Appeal Tribunal (LPAT) related to ROPA 2. Until the appeal involving these lands has been resolved or the lands have been approved by LPAT and brought into the Urban Area of the ROP, the consideration of a stormwater management facility or any other use on these lands associated with the proposed plan of subdivision is premature at this time.</p> <p>As such, Regional staff will not be evaluating or commenting on any land use proposed on lands outside of the draft plan that are under appeal. Regional staff requests that any analysis with respect to these lands within the supporting technical studies be removed entirely. Regional staff supports City staff’s comments on this application suggesting an interim stormwater management facility on the east side of Street A in order to facilitate the development of the business park blocks east of Street A which are appropriately designated and zoned for business park uses</p>	<p>Where lands outside the limits are owned by the applicant, they have been so noted.</p>
<p>Land Use Compatibility Business Park Block 1 is located adjacent to the existing residential properties on Allendale Road and Fountain Street North. City OPA 30 considered land use compatibility between the residential properties and the proposed business park lands. A 70-metre Transition Area was included and site-specific policy 8.10.75.2 for this block outlines various requirements to help minimize possible negative impacts from future</p>	<p>Acknowledged. The requirement for the Agreement can be addressed as a condition of Draft Plan approval.</p>

<p>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 agreement.</p> <p>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 Business Park Block 1 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>	
Region – Environmental Planning	
<p>The subject lands were included in the East Side Lands (Stage 1) Master Environmental Servicing Plan and Community Plan, and are subject to the Freeport Creek and Tributary to the Grand Subwatershed Study (Aquafor Beech Ltd., November 2013). Any development in this area is expected to incorporate the recommendations of the applicable studies, including the Subwatershed Study (SWS). Additionally, a Terms of Reference for the EIS was provided by the Region’s Ecological and Environmental Advisory Committee (EEAC) on September 24, 2018, although this is not referenced in the EIS.</p> <p>Generally, the proposed development/draft plan cannot be supported at this time due to the impacts and recommendations related to the designated and proposed elements of the Greenlands Network on the site, including removal of portions of the Greenlands Network. The elements of the Greenlands Network include the proposed</p>	<p>The Terms of Reference for the EIS provided by EEAC has been included in Appendix I of the EIS Addendum.</p> <p>The Draft Plan has been revised to expand the limits of Block 5 (Open Space), such that development is not proposed within the elements of the Greenlands Network (Core Environmental Features/PSW). Please see Map 1 of the EIS Addendum.</p>

<p>Environmentally Sensitive Policy Area (Candidate ESPA 3) which is generally coincident with the limits of the Maple Grove Road Wetland Complex Provincially Significant Wetland (PSW) on the site and the Significant Woodlands, currently designated in the ROP as Core Environmental Features.</p>	
<p>Removal of Core Environmental Features The draft plan of subdivision and Planning Justification Report identify the removal of a portion of the confirmed PSW/Candidate ESPA to facilitate the design of Business Park Block 3. The PSW (and Candidate ESPA) are subject to the Core Environmental Features policies of the ROP. ROP Policy 7.C.9 does not permit development or site alteration within Core Environmental Features except for limited uses such as wildlife management and conservation, flood or erosion control, or infrastructure projects. The proposed development does not meet any of the limited uses permitted within Core Environmental Features, and as such, the proposed plan of subdivision which depends on the removal of portions of Core Environmental Features is not supported by the ROP. The proposed plan of subdivision does not conform to the ROP as it impacts Core Environmental Features, and the Owner/Developer is advised to re-design the draft plan to conform to the ROP policies for Core Environmental Features. The Greenlands Network elements have been well documented in this area, and based on the most recent staff attendance at the site (Fall, 2018), the information related to delineations of the features is considered to be accurate. As such, no encroachment into, or removal of, Core Environmental Features will be supported.</p>	<p>See above – development is not proposed within the Core Environmental Features and the boundary of Block 5 (Open Space) has been expanded accordingly. The revised Draft Plan does not propose the removal of portions of the PSW/Core Feature.</p>
<p>Candidate ESPA As identified in the EIS, the SWS recommended the designation of an Environmentally Sensitive Policy Area (Candidate ESPA 3), which is intended to be designated in the ROP through the currently ongoing ROP Review process. The EIS suggests that due to the gap between the southern woodland and the northern woodland/PSW area, and the interior habitat as being “likely somewhat smaller in size” (closer to 3ha rather than 3.19ha), that it is appropriate to treat the two features</p>	<p>The Draft Plan has been revised to include the entirety of the PSW within Block 5, together with recommended buffers, which have been increased to 30m in almost all locations. The gap between the northern and southern woodlands no longer contains any grading of SWM facilities. As described in Section 2.1 of the EIS Addendum, the gap will be enhanced with native vegetation plantings and restored following the recommendations of the SWS.</p>

<p>separately and exclude the Significant Woodland from the Candidate ESPA. Staff do not support this recommendation. Rather, staff suggest that the implementation of the SWS recommendations are more appropriate in this area. Specifically, a 30m buffer around the entire feature and the enhancement of the areas within the 'gap' and adjacent feature that are identified as Rehabilitation and Restoration areas in the SWS (e.g. Figure 4.1.11).</p> <p>Implementation of the recommendations of the SWS relative to the Rehabilitation and Restoration Areas will: enhance the Greenlands Network; contribute to the integrity of the natural features, including the linkage areas; and offset clearing that has occurred within the last two years and the anthropogenic impacts to the features described in the EIS.</p>	<p>A 10m buffer is recommended for the southern upland woodland in keeping with the policies of the ROP (which require a 10m buffer for Core Environmental Features). While a 30m buffer is recommended in the SWS and in this Region of Waterloo comment, rationale for a reduced woodland buffer was provided in the original EIS (page 45), repeated here for clarification:</p> <p><i>"A 30m development setback has been recommended as per the Subwatershed Study for the entire Candidate ESPA #3, including the PSW and the upland woodlot (Aquafor Beech Ltd. 2013). However, the majority of the characteristics meeting the criteria for designation as an ESPA are specific to the PSW portion, rather than the upland woodlot. These characteristics include the presence of interior forest, PSW, significant species habitat, and groundwater storage and recharge (Aquafor Beech Ltd. 2013). At the landscape level, the upland woodlot appears to provide an extension of habitat and ecological functions that are complimentary to the PSW. The woodlot portion itself is anticipated to be more resilient to changes in adjacent land use. Therefore, a minimum setback of 10m from the upland woodlot portion (non-PSW) is likely to provide adequate protection to the form and function of that feature. A minimum setback of 30m is recommended for the PSW portion of the Candidate ESPA #3 in keeping with the recommendations of the subwatershed study."</i></p> <p><i>A 10m buffer for the southern woodland portion of the Candidate ESPA is still considered adequate for the protection of the existing and future ecological function of the overall feature, particularly in the context of the substantial restoration and enhancement that is proposed (see Section 3.3 of the EIS Addendum).</i></p>
<p>Buffers</p> <p>The EIS states that there is a need for 'smoothing' or minor normalizing of some sections of irregular protective buffers. Generally, staff are not supportive of smoothed buffers, although they can be considered in specific cases. As the buffers that are proposed to be smoothed are</p>	<p>Removal of the section of PSW is no longer proposed. A minimum 30m setback from the PSW boundary is maintained for the entire feature, with the exception of 2 small areas, including the approximately 20m-long portion adjacent to the small triangular "lobe" of Thicket Wetland previously proposed for removal. In this location, a 15m setback is</p>

<p>in areas that are not supported by ROP policy (i.e. removal of Core Environmental Features), specific areas have not been commented on at this time. It is requested that the plan of subdivision be revised and that, wherever possible, uniform buffers of 30m be applied to the designated and proposed ROP features, consistent with the SWS recommendations. The buffers should be clearly depicted on the draft plan in addition to the EIS figures. Discrete areas of reduced or modified buffers may be considered if there is clear and adequate justification provided for them in the EIS.</p> <p>If trails are proposed to be located within buffers, the Region's preference is to have them located on the outer portion of the buffers. It appears that there are also trails proposed within the Core Environmental Features, but the impacts are not clearly assessed in the EIS. It is also strongly recommended that if any trails are proposed to be public trails, that the Owner/Developer ensure the Parks Department is agreeable to the design for the trails, and that the EIS addresses the requirements of public multi-use trails</p>	<p>proposed. To offset the narrower buffer width in this area, feature setbacks immediately south have been increased to a maximum of 94m from the wetland boundary. This has resulted in approximately 0.22ha of additional land currently comprised of sod that will be planted and enhanced. The rationale for these modified setbacks is discussed in the revised impact analysis of the EIS Addendum (see Section 2.1).</p> <p>Block 8 (Walkway) of the revised Draft Plan is now located either outside or at the outermost edge of the wetland and woodland boundaries. The legend on Map 1 of the EIS Addendum includes the notation for the trail network so as to clearly show the location of all trails within the subject property.</p> <p>The requirement for a Trails Plan can be addressed as a condition of Draft Plan approval.</p>
<p>Section 2.1, Paragraph 3 refers to the narrow western portion of Open Space Block 9 featuring SWM facilities and habitat enhancements to facilitate an ecological linkage between the eastern PSW/woodlot and habitats west of Allendale Creek. Is this reference to Block 9 correct (i.e. does it correspond to the draft plan of subdivision) and if so, please provide additional explanation for this statement.</p>	<p>The sentence in question should have read: "<i>The narrow eastern portion of Open Space Block 6 will feature both SWM facilities and habitat enhancements to facilitate an ecological linkage between the eastern PSW/woodlot and habitats west of Allendale Creek.</i>" In the revised Draft Plan, the area being referred to is the gap between woodlots in the eastern portion of Block 5. SWM facilities are no longer proposed in this location, however restoration and enhancement measures will be implemented (Section 3.2 of the EIS Addendum)</p>
<p>Any updates to the EIS should include an update to the PPS reference (from 2014 to the current 2020 PPS).</p>	<p>An Addendum to the EIS has been prepared in lieu of a revised EIS; the policy context of the original EIS is still applicable. With the revisions made to the Draft Plan, the project is in compliance with the 2020 PPS</p>
<p>The EEAC-approved Terms of Reference and any relevant agency correspondence must be included as appendices to the EIS.</p>	<p>The EEAC-approved Terms of Reference is included in Appendix I of the EIS Addendum</p>
<p>Although the linkage identified in the SWS (east-west corridor) is not a designated Core Environmental Feature, ROP policy 7.E.7 requires the incorporation of linkages into the design of new development to maintain, enhance or, wherever feasible, restore linkages among</p>	<p>City of Cambridge staff have requested that additional details be provided on the design of the east-west corridor as it pertains to the ecological form and function of the new linkage feature. Section 3.2 of the EIS Addendum provides additional details on the corridor design,</p>

<p>environmental features. To this end, Regional staff suggest that the linkage design may need to be modified to ensure that it meets the intent and relevant recommendations of the SWS.</p>	<p>and includes a discussion of the relevant recommendations of the SWS. Appendix III shows a conceptual cross-section of the corridor illustrating the ecological components of the feature</p>
<p>In conclusion, the draft plan of subdivision does not conform to the Greenlands Network policies of the ROP, and as such, the plan will need to be revised. Once the draft plan of subdivision is revised to respect the ROP policies, the EIS should be updated accordingly, or an Addendum provided to address the changes. The revised plan and EIS will be considered by the Region's Ecological and Environmental Advisory Committee (EEAC). EEAC consideration of a plan that conforms to ROP policies will include a recommendation for conditions of draft approval. Prior to draft plan approval, the above comments must be addressed through the submission of an EIS Addendum and a revised draft plan of subdivision.</p>	<p>The revised Draft Plan conforms to the Greenlands Networks policies. The included EIS addendum addresses the changes.</p>
<p>Hydrogeology and Source Water Protection</p>	
<p>The Hydrogeological Assessment and Water Balance – Preliminary Report, Phase 3 Lands, IP Park Project, EXP Services Inc., March 2020 is considered to be incomplete and needs to be revised/updated as follows:</p> <ul style="list-style-type: none"> • The report focused on addressing the GRCA's concerns with respect to stormwater management, water balance, SGRAs/HVAs, etc. but did not address the Region's source water protection concerns, and more specifically how activities associated with the proposed development constitute a potential threat to nearby drinking water sources and how those threats will be mitigated • The report should identify all nearby municipal water supply wells (including the new supply well P18 at the Region Operations Centre on Maple Grove Road) and associated municipal water supply aquifers, as well as the nearby surface water intake at Hidden Valley • The report should include Clean Water Act Wellhead Protection Areas and vulnerability scores for municipal supply wells and IPZ-2. These should include those in the currently 	<p>Noted and addressed. Please refer to revised Hydrogeological Report.</p>

<p>approved Grand River Assessment Report, as well as those in the 2019 approved AR which come into effect October 1, 2020.</p>	
<p>HSW staff support the mitigation recommendations in the Hydrogeological Assessment and Stormwater Management Report with respect to the water balance and the use of Low Impact Development (LID) for the subject property. Staff also support the mitigation recommendations in the Hydrogeological Assessment to complete Risk Management Plans for winter salt use and Spill Response and Contingency Plans, especially for those properties that drain to the IPZ-2 along Allendale Creek and ultimately to the Grand River.</p>	<p>Noted and addressed. Please refer to revised Hydrogeological Report.</p>
<p>Further, the Region supports mitigation measures in the Hydrogeological Assessment report to protect shallow private wells in the area, particularly in the Allendale Road and Fountain Street North area where there is a history of shallow well interference complaints. A detailed shallow groundwater-surface water balance is recommended for the lands that drain to this area to ensure shallow wells aren't impacted due to site grading activities and winter salt use. Consideration should also be given to completing a door-to-door private well survey in this area to identify any shallow wells which may be at risk to site grading activities and winter salt use.</p>	<p>Noted and addressed. Please refer to revised Hydrogeological Report.</p>
<p>The Chloride Impact Study – Preliminary Report, EXP Services Inc., June 21, 2019 was completed prior to the Hydrogeological Assessment and Stormwater Management reports (March 2020) and should be revised to be consistent with the water balance in the latter reports. Drawings and figures are also missing in this report.</p>	<p>Noted and addressed. Please refer to revised Hydrogeological Report.</p>
<p>At this time, the proposed plan of subdivision cannot be supported partly due to the limited amount of pre-development data that has been collected to date. It is a requirement of the Freeport Creek and Tributary to the Grand Subwatershed Study (Aquafor Beech Ltd., November 2013) to collect a minimum of one year of pre-development baseline monitoring for groundwater quality and elevations. Regional staff note that only one summer of monitoring was completed by the consultant. In addition, a net 15% loss of</p>	<p>Noted and addressed. Please refer to revised Hydrogeological Report.</p>

<p>infiltration is proposed for the post-development scenario compared to the pre-development scenario. This proposed loss will not be supported and must be mitigated prior to draft plan approval. Prior to draft plan approval, the above comments must be addressed and the updated Hydrogeological Assessment and Chloride Impact Study submitted to the Region's satisfaction.</p>	
<p>Region – Water Services</p>	
<p>Section 4.1, pg. 7 Intermarket Road cross-section, as designed by the City, is proposed as a 30 metre wide right of way, consisting of four (4) lanes of traffic measuring 3.65 m wide, concrete curb and gutters, a 3.70 m wide landscape and site furnishings zone, a 3.0 m wide multi-use trail, and the 1.0 m wide land use transition zone, totaling for 30.0 m between property lines. The typical cross section for Intermarket Road should show the proposed deep trunk sanitary sewer.</p>	<p>The cross section as per IP Park Phase 2 is included in the report as per other comments received. Note that this cross section does not include the trunk sanitary sewer</p>
<p>Section 6.1 states that the sanitary design rates used in the FSR are consistent with the East Side Lands (Stage 1) Master Environmental Servicing Plan and Community Plan and Class EA. A comparison between the flow generation from these rates and the flow generation based on the DGSSMS should be discussed in the report. For example, the equivalent residential per capita flow rate is 275 L/c/d, and I&I rate is 0.25 l/s/ha as per DGSSMS B.3.1.2.1 and B.3.1.2.6., respectively</p>	<p>The MESP supersedes the DGSSMS however, a comparison has been added into the report</p>
<p>Section 6.1, pg. 11, states that two 200mm sanitary sewers would be required to service the development. Why are two 200mm sewers required?</p>	<p>The connection to the trunk sewer is at two locations so two sections are required</p>
<p>Section 6.1.1. should make it clear that the installation of the deep trunk sewer should be incorporated into the construction of the subdivision servicing. It is anticipated that a local sewer will be required in addition to the deep trunk, based on the depth of the trunk. At the end of the summary, it is suggested that service laterals will connect to trunk manholes, but this section states lateral connections to two local sewers. The sanitary servicing strategy is unclear.</p>	<p>Wording added for incorporation of installation of deep trunk into subdivision servicing. Service laterals will connect to the two local sewers ("sanitary laterals are proposed to connect to local sanitary manholes"), which will in turn discharge to the trunk sewer.</p>
<p>6.1.2. sentence is not finished...</p>	<p>Revised</p>
<p>Section 6.2, pg, 12</p>	<p>1. Revised</p>

<p>This section has identified that the watermain on Intermarket Road will be a 300mm in diameter in addition to the inclusion of a 300mm dia watermain from Allendale Road. This watermain has been identified in the City of Cambridge Capital Plan. It also notes:</p> <ol style="list-style-type: none"> 1. 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 will be completed by others under separate cover. This information needs to be included in an updated Functional Servicing Report prior to draft plan approval 2. Will the report by others look at phasing of the entire IP Park Development? 3. The Fire Underwriters Survey for Public Fire Protection recommends that a 5-hour duration be assumed for the industrial fire flow rate of 21,200 L/Min. (353 L/sec) 4. Pg. 13 near the bottom there is a maximum recommended building size. How was this determined? It cannot be calculated based on maximum allowable velocity 5. Where are the calculations and discussion that determine what the available fire flow is for the employment blocks? Regional staff will not be reviewing any Residential Fire Flow analysis at this time for any contemplated future residential lands that are not part of this application 6. This section does not address any staging considerations. For example, what external work is required to support this development, timing, fiscal commitment from municipalities, etc 	<ol style="list-style-type: none"> 2. Yes 3. Noted 4. Clarification added to report 5. Calculations included in the Appendix, Residential Lands have been removed 6. Reference to Water Distribution Report now included with details re phasing, etc.
<p>Section 6.2, in addition to the above comments, the design flow rate should be completed using the DSGGSM guidelines and compared to the MEST rates</p>	<p>Reference to Water Distribution Report now included, which includes discussion of the requirements as per DGSSMS</p>
<p>Summary, pg. 15 Summary point 4 does not provide enough supporting information to demonstrate how the looped water system will work without including the report by others that would also address any staging requirements.</p>	<p>Reference to Water Distribution Report now included</p>

<p>The proposed watermain connections suggested in this summary are to watermains that do not exist.</p>	
<p>The following are general comments:</p> <ol style="list-style-type: none"> 1. The discussion about pipe sizes and velocities is not sufficient for determining whether the proposed development can be supported by the existing infrastructure 2. The FSR should discuss anticipated pressure in the subdivision. Are pressure reducing valves going to be required? 3. There is no discussion about the proposed development exceedance of the maximum dead-end length for servicing. The 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. 	<ol style="list-style-type: none"> 1. Reference to Water Distribution Report now included 2. Now included in Report 3. Now included in Report
<p>In summary, the FSR does not provide justification that the proposed plan of subdivision can be supported by existing and planned infrastructure. Prior to draft plan approval, an updated FSR must be submitted to the satisfaction of the Region and the City.</p>	<p>Updated FSR included with this resubmission</p>
<p>Region - Corridor Planning</p>	
<p>Corridor and Transportation Planning staff reviewed the report entitled IPort Industrial Lands, Cambridge, Ontario, Transportation Impact Study, Paradigm Transportation Solutions Limited, March 2020 and comments were provided to the transportation consultant in an email dated June 22, 2020. The comments must be addressed in a Memo and/or updated report and submitted to the Region for review prior to draft plan approval.</p>	<p>Noted. We note that the Region provided additional comments in an email to Paradigm on June 5, 2020, which were subsequently addressed in a letter to the Region dated August 11, 2020. The Region reviewed the submission and indicated they had no further concerns and concurred with the report recommendations.</p>
<p>Staff also reviewed the report entitled IPort Cambridge Industrial Subdivision, HOOPP Investments Incorporated c/o Triovest, Stormwater Management Report, EXP Services Inc., dated March 10, 2020 with respect to those lands abutting Regional Road #17</p>	<p>Noted. A work permit will be applied for at the appropriate time.</p>

<p>(Fountain Street North) and have found the plans satisfactory. A Regional Work Permit must be obtained from the Region of Waterloo prior to commencing construction within the Region's right of way. In this regard, the Owner/Developer needs to visit https://rmowroadpermits.mirasan.ca for further guidance.</p>	
<p>Region – International Airport</p>	
<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 are 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>This matter can be addressed through an appropriate condition of Draft Plan approval.</p>

Region – Transit Planning	
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.	The development does not preclude the future inclusion of bus stop locations along Intermarket Road, or any of the existing adjacent streets.
Regional staff notes that the "Potential Future LRT Route" and "ION Light Rail Stage 2 Station" identified on Figure 2 of the Planning Justification Report (PJR) (MHBC Planning, revised March 2020) should be updated with the preferred route (and LRT Station) for Stage 2 ION endorsed by Regional Council in June 2019. The PJR 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.	The Figure has been updated within the Report.
Region – Cultural Heritage	
The Archaeological Assessments submitted in support of the proposed Plan of Subdivision did not cover any of the lands municipally addressed as 105 Middle Block Road. Assessment of this property must be submitted prior to draft plan approval	A revised Archaeological Assessment has been prepared for the lands, including Stage 1 and 2 Assessments. A portion of the lands are proceeding to a Stage 3 Assessment. The Stage 3 Assessment is being finalized for submission to the Ministry. Once the Assessment and related findings/conclusions are finalized and acknowledged by the Ministry, the report will be provided to the City and Region.
Further, Regional staff did not receive the Ministry Acknowledgement of the Stage 1-2, and Stage 3 Assessment for 250 Allendale Road. As these Reports were submitted to the Ministry in February 2019, the Acknowledgement Letter for 250 Allendale Road should be available and submitted to the Region prior to draft plan approval.	See above – the entirety of the lands within the limits of the Draft Plan have been assessed. Consultation with the Ministry is ongoing. An acknowledgement letter will be provided to the Region prior to Draft Plan approval.
In May 2020, Regional staff advised the Owner's/Developer's planning consultant at MHBC Planning of the above noted missing Assessment and the Ministry's Acknowledgement letters. MHBC Planning advised that the lands at 105 Middle Block Road is a sod farm, which will mature in spring of 2020 and will be harvested over the next few months and that there is an agreement amongst the property owners that site work (such as the plowing needed for the Archaeological	The entirety of the lands within the limits of the Draft Plan have been assessed. Consultation with the Ministry is ongoing

Assessment) can take place after July 2020 once the sod has been removed. Regional staff was not consulted on alternative timing for the completion of the Archaeological Assessment for 105 Middle Block Road to accommodate the sod farm. As this Assessment and the Ministry Acknowledgement letters for both properties should have been completed and submitted with the plan of subdivision application, the Region requires the completion and submission of the Assessment for 105 Middle Block Road prior to draft plan approval and the submission of the Ministry's Acknowledgement for this Assessment only as a condition of draft approval. Further, Regional staff advised MHBC Planning in May of 2020 that arrangements should be made immediately for a licensed Archaeologist to start preparing the Archeological Assessment, as Stage 1 is primarily a desktop exercise and does not require field work.

Please note, this area is one of the earliest inhabited areas in the Region, therefore, the potential for the recovery of resources is high, and any recommended mitigation measures required may need to be included in the conditions of draft plan approval.

GRCA Comments

The submitted draft plan drawing proposes a portion of Block 3 (Business Park) within a portion of the PSW at the northeast corner of the subject lands. On August 29, 2018, in response to a pre-consultation application (D27/18), the GRCA provided the following comments to the City of Cambridge:

The Grand River Conservation Authority (GRCA) is not supportive of the submitted options since they both propose development in a Provincially Significant Wetland, does not provide any buffers to the natural heritage and natural hazard features, and is not consistent and/or conform with the Master Environmental Servicing Plan for Stage 1 of the East Side

The Draft Plan has been revised such that no development is proposed within the PSW. Please refer to the EIS Addendum and the revised Draft Plan.

The revised Draft Plan also does not alter the identified boundary of the feature - the feature and the recommended buffers are located within Open Space Block 5.

<p><i>Lands (including the Freeport Creek and Tributary to the Grand Subwatershed Study and Master Drainage Plan), recently approved Environmental Assessments, and the North Cambridge Business Park Official Plan and Zoning By-law Amendments.</i></p> <p>This current draft plan proposal continues to show development in the PSW by removing a portion of this wetland area to support a larger Block 3 (Business Park). The Planning Justification Report (prepared by MHBC Planning) refers to the Environmental Impact Study (EIS) that was prepared by NRSI noting that the <i>'study also recognized areas within the core environmental features which can be removed, enhanced and compensated in other areas to maintain a strong core environmental feature that will remain healthy through the duration of development and the future. The recommendations of the NRSI Environmental Impact Assessment have been incorporated into the design of the proposed industrial subdivision.'</i> The GRCA does not agree with this assessment nor agree to the removal of a portion of the wetland area. Further, GRCA ecological staff did attend on site to delineate the limits of the PSW with NRSI, Region of Waterloo, and City of Cambridge staff on October 17, 2018. At the site meeting, the wetland area that is currently shown on GRCA mapping was confirmed in the field. The removal of a portion of the PSW is not acceptable and/or supported by the GRCA. Any development and/or site alteration in a PSW would not conform to the natural heritage polices of the Provincial Policy Statement (PPS), Region of Waterloo, City of Cambridge, and GRCA policies. Further, the GRCA would not support a permit for any development and/or site alteration within these wetlands under Ontario Regulation 150/06. Therefore, the draft plan must be revised to exclude any proposed development blocks within the PSW.</p>	
<p>There are several references in the Figures 1 and 2 within the Planning Justification Report (prepared by MHBC Planning) that the applicants (IPort Cambridge GP Inc./Triovest Realty Advisors Inc.) on this draft plan owns additional lands referred to as Phase 1 and Phase 2 Business Park. This is not correct. These lands are not owned by the applicants</p>	<p>The figures have been corrected and are included within the revised Report.</p>

<p>but rather by Intermarket CAM Ltd. This should be corrected in future submissions.</p>	
<p>Water Resources Engineering Comments</p>	
<p>The dispersion length for the SWM pond forebay should be calculated using the capacity of the pond's inflow pipe. Please correct.</p>	<p>Since the capacity of the pipe has been designed for the controlled 100-year flow, (i.e. the inlet has been designed for storms larger than a 10 year return period), the dispersion length has been regulated using the 10-year flow as per MOE (2003)</p>
<p>Section 4.10 of the SWM report- The pervious surface infiltration is not to be included as part of the impervious surface infiltration calculations. Please correct.</p>	<p>Table (now Table 4-11) has been revised</p>
<p>Section 4.10 of the SWM report- 25 mm of rooftop infiltration has been included for Block 3 however, it seems only a portion of this is to be diverted to infiltration to support the PSW. Please correct or clarify.</p>	<p>The infiltration gallery has been sized for the 25mm storm, and under minor storm conditions this will discharge to the PSW. However any overflow from the infiltration gallery will drain via Block 3's storm infrastructure</p>
<p>To reduce runoff volumes and distribute infiltration, it is recommended that 25 mm be infiltrated from all industrial rooftops on-site.</p>	<p>Only the required volume will be infiltrated</p>
<p>The water balance to the PSW needs to determine the monthly surface runoff and infiltration that occurs from the development area currently, and show that it will be matched post development. A similar water balance is needed for the significant woodland.</p>	<p>EXP has conducted a monthly, feature-based water balance analysis for the PSW. One was not required for the Significant Woodland. NRSI has revised the Water Balance portion of the impact analysis to incorporate this new information and determine if there are any potential ecological impacts from changes to runoff volumes under post-development conditions (see Section 2.6 in the EIS Addendum).</p>
<p>Geomorphic analysis recommended a critical discharge value of 0.25m³/s for Allendale Creek and shall be considered the maximum discharge rate to Allendale Creek. However, given that this channel is 'in-adjustment' and the general erodibility of the channel no one critical discharge recommendation is expected to alleviate future erosion hazards. As such preference should be given to LID stormwater practices which mimic or reduce pre-development runoff volumes and peak flow durations.' Does this statement pertain to the portion of the creek where post development flows will be discharged to or are the erosion issues upstream? Please clarify.</p>	<p>It is NRSI's understanding that the quoted statement regarding critical discharge values to Allendale Creek refers to stream reaches downstream of where post-development flows will be discharged. There are no erosion issues upstream of the SWM pond outflow. Additional details on the geomorphic character of Allendale Creek can be found in the Fluvial Geomorphic Analysis (Water's Edge 2020).</p>

<p>A fluvial geomorphic analysis of Allendale Creek should be completed for the proposed development plan</p>	<p>This analysis has been prepared by Water's Edge and forms part of this resubmission. NRSI has reviewed the report to inform the revised analyses in the EIS addendum. The SWM facility does not discharge to Allendale Creek.</p>
<p>EIS</p>	
<p>The EIS contains quotes from the SWM report that flows will be diverted from the Hespeler West and Freeport Creek watersheds, a total of 55 ha, yet concludes that surface water patterns will be maintained. Please explain and comment on the impacts to each subwatershed and associated water features</p>	<p>Please refer to Section 2.5 of the EIS Addendum for clarification on this item. Additional details are also available in the updated Stormwater Management Report prepared by EXP (dated September 17, 2020).</p>
<p>While flows to Allendale Creek are being matched for the 25mm storm event, there will be an increase in flow for storm events less than the 25mm and a decrease in flow for events greater than the 25mm. The EIS should comment on the impact</p>	<p>Please refer to Section 2.3 of the EIS Addendum.</p>
<p>Section 8.6.3 of the EIS- 'The infiltration galleries will be designed to infiltrate all runoff from the 25mm storm (EXP 2020b). The infiltration target will be achieved through the application of an infiltration layer at the bottom of the bio-retention facility within the 50.0 m Wildlife, SWM, and Pedestrian Walkway Corridor where the soils appropriately high percolation rates. The proposed approach avoids situations where an increase in surface water runoff occurs.' Please indicate where this information was sourced from, as it was not found in the SWM report. The SWM report only discussed the bioswales being used for peak flow control. The statement that there will be no increase in surface water runoff is incorrect, as the volume of runoff will increase. Please clarify</p>	<p>The cited text was sourced in error from an older version of SWM report and should be disregarded, particularly in the context of the revised SWM Report dated September 17, 2020. The revised Water Balance Analysis provided in Section 2.6 of the EIS Addendum discusses the change in monthly runoff volumes being directed to the PSW and assesses potential impacts.</p>
<p>It is unclear what is meant by the conclusion in the EIS that a balanced water budget can be achieved. The water budget should consider peak flows, runoff volumes and infiltration volumes. As evaporation is decreased with development, the water budget will change from pre development. Please clarify</p>	<p>A revised Water Balance Analysis based on monthly feature-based data provided by EXP has been included in the EIS Addendum (see Section 2.6).</p>

Slope Stability Assessment	
The top of slope and setback identified in the slope stability assessment report should be extended a bit further to include all slopes 5:1 or steeper. Please clarify.	In accordance with common industry practice, including a score of zero on the Ontario Ministry of Natural Resources rating chart for slopes 3H:1V or flatter, the top of slope is defined to where the 4:1 slope is realized. Noting that the Factor of Safety (FOS) within the Slope Stability Analysis is well beyond the minimum requirements and that the stormwater management facility is in excess of 12 meters away from the slope, it is our opinion that the current top of slope boundary is sufficient and in line with current practices
A further slope assessment may be needed for development of future lands	Noted. The lands west of Intermarket Road are outside the limits of the Draft Plan, except for the Open Space and SWM facility Blocks.
Natural Heritage Comments	
The removal of a 0.4 ha section of the PSW is not supported by the GRCA. Wetland compensation plans discussed in the EIS report are not supported by current wetland policy. It is requested that the grading plan and block limits for Block 3 be revised so as to avoid this wetland. It is requested that the PSW be protected in its entirety with a 30 m buffer.	The revised Draft Plan no longer includes the removal of any portion of the PSW. A minimum 30m setback from the PSW boundary is maintained for the entire feature, with the exception of 2 small areas, including the approximately 20m-long portion adjacent to the small triangular "lobe" of Thicket Wetland previously proposed for removal. In this location, a 15m setback is proposed. To offset the narrower buffer width in this area, feature setbacks immediately south have been increased to a maximum of 94m from the wetland boundary. This has resulted in approximately 0.22ha of additional land currently comprised of sod that will be planted and enhanced. The rationale for these modified setbacks is discussed in the revised impact analysis of the EIS Addendum (see Section 2.1).
We request that the recommended 30 m setback from Allendale Creek be clearly illustrated on Map 2 of the EIS. The 30 m setback limit also needs to be labelled more clearly on the draft plan	The revised Draft Plan illustrates the 30 m setback. The Draft Plan is included as Map 1 within the EIS Addendum.
Notwithstanding the headwater feature drainage analysis in Section 7.0 and Map 2 in the EIS, which suggests alterations will be made along	The revised impact analysis in the EIS Addendum now includes a discussion of potential physical impacts to Allendale Creek from the

<p>Allendale Creek, proposed physical impacts to the watercourse were not discussed in Section 8.5 (Direct Impacts) of the EIS report. Section 8.5.2 of this report confirms that the cultural woodland along this creek corridor will be removed. Assuming physical alterations to the watercourse are also proposed, the GRCA would support measures that will restore or enhance hydrologic functions along this corridor. Please verify that proposed watercourse alterations will be accordance with GRCA policy.</p>	<p>proposed development (see Section 2.3). Recommendations for restoration and enhancement of the hydrologic function of the existing corridor, and a discussion of project compliance with GRCA policies, are also included in this section. Alterations to the main stem of Allendale Creek are not proposed.</p>
<p>With respect to Section 8.6.1 (Surface Water Flow Patterns), the EIS notes that "due to the extreme erosion that occurs within the Allendale Creek ravine, additional investigations by geomorphology professionals may be required to provide guidance on the appropriate amount of flow and release rates feeding the creek under the post-development scenario" (p. 69). Further discussion is also required to demonstrate that proposed physical alterations to the watercourse and its associated valley would be in conformance with GRCA policy.</p>	<p>Please refer to the response above.</p>
<p>A 6 m setback from the stable top of slope adjacent to Allendale Creek was recommended in the Slope Assessment (prepared by EXP Services). We presume this structural setback does not apply to proposed watercourse alterations. Please confirm. This setback should also be clearly illustrated on Map 2 of the EIS and added to the draft plan</p>	<p>The revised Draft Plan includes the 6m setback for the erosion slope (shown as Map 1 in the EIS Addendum). Alterations to the main stem of Allendale Creek are not proposed.</p>
<p>The proposed "Block 7 Walkway/Service Corridor" is shown as single and double lines on Map 2 but this feature is missing from the map legend. It also appears that sections of this trail would be situated within or immediately adjacent to the Maple Grove PSW. New trails within wetlands are not supported by the GRCA. It is requested that the trail be setback 30 m from the wetland (preferred) or be located toward the outer portion of the 30 m wetland and watercourse buffer zone</p>	<p>Block 8 (Walkway) on the revised Draft Plan is located either outside or at the outermost edge of the wetland and woodland boundaries. The legend on Map 1 of the EIS Addendum includes the notation for the trail network so as to clearly show the location of all trails within the subject property.</p>
<p>The location of trails and anticipated impacts will need to be discussed as part of the EIS, as outlined in the terms of reference. Please address.</p>	<p>Potential impacts to existing natural features resulting from the proposed trail network concept are discussed in the EIS Addendum (see Section 2.2).</p>

Advisory Comments	
We recommend that Map 2 in the EIS be revised to make a clear distinction between the cultural woodland associated with Allendale Creek and the significant woodland, which is a candidate for a Region of Waterloo ESPA	The revised Draft Plan (shown on Map 1 of the EIS Addendum) includes a clear distinction between the 2 woodland areas
We recommend that the 10 m setback limit from significant woodland areas be illustrated on Map 2 of the EIS for added clarity	The revised Draft Plan (shown on Map 1 of the EIS Addendum) shows the 10m setback from the Significant Woodland
Additional information will be needed during the detailed design stages to clearly demonstrate how all buffer zones and wildlife corridor areas will be restored or enhanced	Noted. This can be addressed through an appropriate condition of Draft Plan approval.
We recommended that the proposed wildlife corridor between the Maple Grove PSW and the Allendale Creek valley be made as wide as possible and adequately buffered to increase the habitat functions for desired wildlife species and to minimize edge effects	Noted. The east-west wildlife corridor is proposed to be 50m wide and enhanced with natural vegetation and trees. This width is approximately equal to the widest portion of the existing woodlot at the upstream extent of Allendale Creek, and is anticipated to adequately facilitate wildlife movement and other ecological functions
Conclusions Based on the foregoing comments, the GRCA is not supportive of the currently proposed draft plan submission. Prior to providing a recommendation for approval of this draft plan of subdivision, the applicants are required to revise the draft plan to exclude development within the PSW and further address the above-noted GRCA comments	The revised Draft Plan excludes the PSW. The EIS Addendum and this Response Table address GRCA comments.