City of Cambridge: Development Planning Section, Rachel Greene		
Comments	**Consultant**	**Response**
The application as submitted has increased the number of dwelling units from the concept presented through the development pre-consultation from approximately 1,550 to a maximum of 1,864		This comment has been acknowledged. No further action required at this time.
An updated concept plan has been submitted to the GRCA regarding additional wetland restoration which has been reviewed by the GRCA, the Region, and City of Cambridge and a response provided on July 23, 2021. These comments should be addressed in the re-submission.	TJCG	A meeting was held with the City, Region and GRCA to discuss the concept plans, and specifically wetland compensation/restoration, on February 24, 2022. A new approach to wetland compensation was determined. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design.
Please provide a detailed response letter/matrix identifying how each agency comment has been addressed. Please also include a detailed response to the comments raised by neighbours at the statutory public meeting.	TJCG	This chart will form part of the letter and response matrix
Any revisions to the proposal, draft official plan, zoning by-law amendments or updates to the supporting documentation are to be summarized in resubmission letter	TJCG	A fulsome summary of changes has been included within the PJR addendum in addition to the itemized comment responses within this chart.
Please note Park's comment's/draft conditions below. A larger municipal park is required to accommodate the proposed number of units in accordance with the Official Plan. Please note Paul Willms is no longer the primary contact for Parks and planning will assist with parks related comments	TJCG	Park size has been increased to the minimum requirement of 2.0ha. Additional trail systems are also proposed along with a school site which provides ample community amenity space. The revised plan was presented to the City, Region and GRCA on February 24, 2022. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design.
Please note comments from the Waterloo Catholic District School Board requirements for a school site	TJCG	Discussions with the WCDSB were held and the Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design including the required 2.41ha school site.
The applicant is to be commended for incorporating a range and mix of housing types. Higher density residential is supported along Speedsville Rd transitioning to lower density interior to the site; however, additional information and justification is required for proposed increase in density to 250 units per hectare	TJCG	Discussions were held with municipal staff. The design and proposed supporting policy have been revised to limit density to 200 units per hectare as required.

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City of Cambridge: Development Planning Section, Rachel Greene		
Comments	**Consultant**	**Response**
Please indicate how compatibility will be addressed between the high density, mixed-use block across from the existing low density residential on the west side of Speedsville Rd. Consideration should be given to compatibility of proposed height increase from four to eight storeys	TJCG	Increased setbacks along Speedsville Road have been implemented in the proposed policy revisions where Equestrian Way only requires 1.5m under current planning approvals. The area has been previously designated for High Density, including a currently permitted 24m (±8-storeys) on the Speedsville Apartment Block located where Block 14 is shown on the most recent development concepts. The density focus on Speedsville is in keeping with previously approved Zoning and Official Plan Policy intent.
Please clarify how many persons and jobs per hectare are proposed across the development.	TJCG	By using preliminary per/unit conversion statistics kindly provided by Bryan Cooper of the City of Cambridge, we calculate the Gross People/Jobs per Hectare to be approximately 134.0/hectare. Similarly, we calculate the Net Residential People/Jobs per Hectare to be approximately 204.5/hectare.
Provide a table with zoning by-law site statistics (setbacks, landscaping, amenity, density, parking, etc.) on the concept/site plans. It would be beneficial to show current site-specific permissions compared to proposed modifications	TJCG	The plans have been updated accordingly.
Confirm minimum 6m distance from window of habitable room to parking space/drive aisle is maintained (s.2.2.2.3(f) of the Zoning By-law) or include in site specific request	TJCG	A site specific provision to reduce the distance to 3m has been included in the proposed site specific zoning.
Please indicate how affordable housing will be addressed in accordance with Policy 8.4.1 of the City's Official Plan	TJCG	An affordable housing response has been prepared and is included in the policy review section of the PJR Addendum.
Please note the City is still in the process of retaining a consultant to undertake the peer review of the Market Impact Study. Policy 10.7 of the Official Plan permits a holding provision to be removed to implement the findings of a site specific market impact study.	TJCG	This comment has been acknowledged. No further action required at this time.

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City of Cambridge: Parks, Recreation & Culture, Paul Willms			
Comments		**Consultant**	**Response**
Submission materials reviewed in the preparation of these comments include the following:			
1.	**Phase 1 Environmental Site Assessment Maple Grove Road & Speedsville Road (Southeast Corner) Cambridge, Ontario (Landtek Limited, June 21, 2018)**		
	a. Phase 1 ESA recommends a Limited Phase 2 ESA. This is required in order to address the reported spills and metals production facility adjacent to the northwest area of the Site. A Record of Site Condition application was filed November 10, 2017.	**Ian / Jeff**	RSC for 1285 Speedsville Road has been registered. The documents have been included in this submission. Environmental Site Assessments and RSCs have been completed as necessary for all lands within the development.
	b. Site assessments (and Record of Site Condition if warranted) are required to partially satisfy the standard City condition of approval for conveyances of properties (see draft condition in Attachment 1).	**Ian / Jeff /** **TJCG**	RSC for 1285 Speedsville Road has been registered. The documents have been included in this submission. Environmental Site Assessments and RSCs have been completed as necessary for all lands within the development.
2.	**Overall Development Plan**		
	Tails		
	a. The rendered draft plan depicts the proposed blocks, including Park, OS, SWM, etc. and also clearly outlines the trail network.		This comment has been acknowledged. No further action required at this time.

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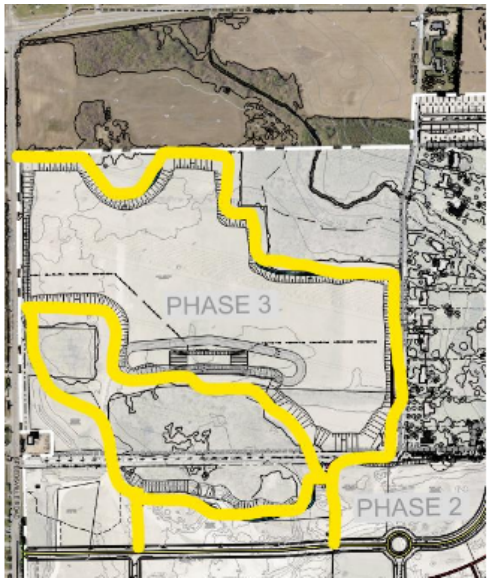
City of Cambridge: Parks, Recreation & Culture, Paul Willms		
Comments	**Consultant**	**Response**
b. The trail network is similar in configuration and length to the previously-approved Trail Concept Plan (see nip, yellow lines). Design, construction, and financing the trail network was part of the parkland dedication condition of approval for the previous Hunt Club subdivision. Approvals and project management are also part of the obligations of the trail condition of approval and the developer will need to incorporate the trail into applicable EIS, GRCA permits, or any other approvals. The Engineering Submission will detail the construction design. Trails should be a minimum of 5m off property lines, separated by grade changes, and if not possible for constraints the developer will need to incorporate screening vegetation / landscape plans as part of the submission. Design, construction, and financing of the trail will be a condition of approval transferred and applied to the River Mill subdivision. A letter of credit of $936,000 (City standard of $312 / 3m-wide asphalt linear metre multiplied by the approximate 3,000 metre length of the system not including SWM accesses) will be provided as part of the Subdivision Agreement (the required cost estimate will refine the letter of credit amount). The Hunt Club 30T-12103 plan also included Blocks 63 and 64, two long walkway blocks (6m X 114.9m and 6m X 123.9m = 0.14 ha) as parkland dedication in order to complete a connection out to Speedsville Rd.. These lands have been returned to housing yield in the River Mill proposed plan but need to be added to the amount of parkland dedication required. The draft trails condition is provided in Attachment 1 and Blocks 63 & 64 (0.14 hectares) is addressed in the parkland dedication comments.  	TJCG / Owners	The previously proposed trails are primarily maintained in the revised Master Trails Plan. The trail deviation from the original approval with consideration for former Blocks 63 and 64 has been provided through additional trails along the southerly edge of the Open Space lands. The result is a greater length of trail network proposed within the Phase 4 lands. Phase 4 proposes 3,290m of 3m wide Multi-Use Trail and 1,670m of Bike Lanes. The original approval included 2,527m of Trails.
Parkland Dedication/Block 5 Park (0.51 hectares)		

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City of Cambridge: Parks, Recreation & Culture, Paul Willms		
Comments	**Consultant**	**Response**
c. A 0.51 hectare park block is proposed. It is centrally located within the development and meets 500m walking distance service levels. However, the size of the park is contrary to City requirements and service levels as outlined in presubmission comments which required a minimum 2 hectare park and the maximum dedication in land based on the number of units and additional units proposed. A revision of the draft plan is required to provide a 3.13 hectare park. This would be consistent with the Official Plan policies and past City comments.	TJCG	Park size has been increased to the minimum requirement of 2.0ha. Additional trail systems are also proposed along with a school site which provides ample community amenity space. The revised plan was presented to the City, Region and GRCA on February 24, 2022. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design.
d. The focus of parkland dedication is on "developable lands" and the Official Plan contains various policies defining what is and what is not considered acceptable lands. The City must be able to construct amenities on the land and therefor Open Space or "environmental" lands are not acceptable as parkland.	TJCG	This comment has been acknowledged.
e. The draft plan proposes 1,864 units in total. This equates to approximately 3000-5000 new residents. The proposed 0.51 hectare park provides a service level of ~1 sq. m - 1.7 sq.m. The Official Plan requires one hectare for every 300 units as the parkland dedication amount (or one hectare per approximately 720-1050 new residents, approximating a level of service of ~9-14 sq.m per person). The proposed park is 10-15 times below service levels. The proposed park block equates to inviting 3000-5000 people to recreate at a park the size of the City Hall parking lot and is unacceptable.	TJCG	Park size has been increased to the minimum requirement of 2.0ha. Additional trail systems are also proposed along with a 2.41ha school site which provides ample community amenity space. The revised plan was presented to the City, Region and GRCA on February 24, 2022. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design. By using preliminary per/unit conversion statistics kindly provided by Bryan Cooper of the City of Cambridge, we calculate the Net Residential People/Jobs per Hectare to be approximately 204.5/hectare. This equates to approximately 4,242 persons. With a park size increased to 2ha, the service level is raised to 4.7m2 per person. A 2.41ha school site has also been introduced in co-operation with the Waterloo Catholic District School Board, adding an additional 5.7m2 per person for a total of 10.4m2 of programmable Open Space. In addition, Phase 4 proposes 3,290m of 3m wide Multi-Use Trail and 1,670m of Bike Lanes.

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City of Cambridge: Parks, Recreation & Culture, Paul Willms			
	Comments	**Consultant**	**Response**
	f. The Hunt Club 30T-12103 plan proposed 750-800 units and that subdivision's parkland dedication condition included these units which must therefore be subtracted from the total units proposed in these applications (i.e. 1,864 units – 800 units = 1,064 units). The Official Plan requires parkland dedication for the 1,064 units at the 1 hectare / 300 unit formula and this yields 3.55 hectares of parkland (this provides a level of service 7 sq. m to 12 sq. m per person). In addition, as mentioned in 2b above, the absorption of the former trail corridor blocks 63-64 involves 0.14 hectares and so the total parkland dedication amount is 3.69 hectares.	TJCG	Based on available R-plans, projects to-date and original approved draft plans the following calculations have been completed for a fulsome response to this comment; • The unused allotment available to-date is 913 as opposed to 800 with the consideration of Block 247 already being built and Mixed-use Block 1 of 30T-12104 being incorporated. • Utilizing the maximum density build-out value of 2,219 units, 1,294 units remain. • At the rate of 300 units per hectare of park, 4.21ha of parkland is required. • If the 0.14ha from Blocks 63 and 64 are brought in, the total required is 4.35 • The revised Phase 4 proposes a 2ha park with a 2.41ha school site for a total of 4.41ha of programable open space uses. • further proposed is 763m of additional trail beyond the original approval for the area previously known as "Hunt Club Phase 3" • 1,670m of public bike lanes are proposed where as none were proposed before. With the consideration of 4.41ha of programmable open space, 763m of additional trail and 1,670m of additional bike lanes proposed, the revised proposed development of Phase 4 meets a high level of service for the public with 10.4m2 per person before the area and cost of trails and bike lanes are taken into account.

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	Comments	**Consultant**	**Response**
	g. Given a total of 3.69 hectares of parkland dedication, the following changes are proposed to satisfy City requirements. As noted above, the central location of the park is accepted and meets walking distance service levels for the development; additional lands therefore, should be added in this location. This involves adding the following to the park block to achieve 3.13 hectares and a viable park to service 3000-5000 incoming residents: • Block 5 – Park (0.51 hectares) • Block 4 – 43 units (1.03 hectares) • Block 6 – 10 units (estimated, units not provided on block) (0.25 hectares) • Block 3 – Stormwater Pond (1.34 hectares) 0.51 + 1.03 + 0.25 + 1.34 hectares = 3.13 hectares	TJCG	Park size has been increased to the minimum requirement of 2.0ha. Additional trail systems are also proposed along with a 2.41ha school site which provides ample community amenity space. The revised plan was presented to the City, Region and GRCA on February 24, 2022. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design. With the consideration of 4.41ha of programmable open space, 763m of additional trail and 1,670m of additional bike lanes proposed, the revised proposed development of Phase 4 meets a high level of service for the public with 10.4m2 per person before the area and cost of trails and bike lanes are taken into account.
	The Stormwater Pond would therefore need to be moved onto Block 2 and eliminate approximately 72 of the units/half the block to achieve a 1.34 SWM Pond block	TJCG	Park size has been increased to the minimum requirement of 2.0ha. Additional trail systems are also proposed along with a 2.41ha school site which provides ample community amenity space. The revised plan was presented to the City, Region and GRCA on February 24, 2022. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design.
	The elimination of 43 + 10 + 72 units = 125 units (1,064 units minus 125 units = 939 units). Applying the 1/300 formula to 939 units would yield 3.13 hectares in parkland dedication.	TJCG	Please see revised calculations and response to comment 2(f) above.
	The additional 0.14 ha/0.35 acres (from the former 30T-12103 plan, Trail Blocks 63-64) would be required as cash-in-lieu at registration (along with an appraisal).	TJCG	This comment has been acknowledged. Final calculations and payment of any potential Cash-in-lieu required will be arranged with Staff prior to final approval.

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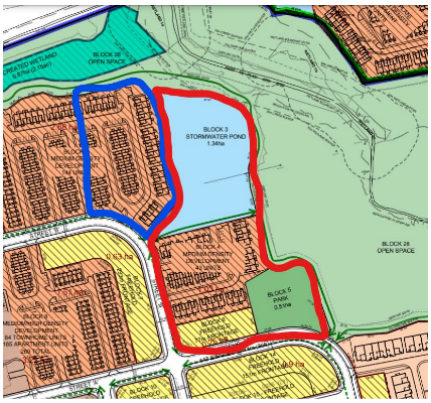
City of Cambridge: Parks, Recreation & Culture, Paul Willms			
Comments		**Consultant**	**Response**
	The markup draft plan shows the 3.13 hectare park (red outline) and the new location for the 1.34 hectare Stormwater pond (blue outline). This is a required revision to the draft plan in order to achieve a park to the satisfaction of the City. 	TJCG	Please see revised calculations and response to comment 2(g) above.
	A draft parkland dedication condition of approval is provided in the Attachment that captures the above details.	TJCG	This comment has been acknowledged.
3.	**Draft Plan of Subdivision January 2021**		
	a. The Draft Plan is required to be revised with the following changes as noted previously: • Create a new 3.13 hectare park block as noted above and delete the applicable other blocks • Create a new 1.34 hectare SWM block from Block 2 (and retain 1.34 hectares/72 units of the block) • Depict the trail network in a colored and dashed line	TJCG	Park size has been increased to the minimum requirement of 2.0ha. Additional trail systems are also proposed along with a 2.41ha school site which provides ample community amenity space. The revised plan was presented to the City, Region and GRCA on February 24, 2022. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design.
4.	**Stormwater Management Report**		
	a. As noted previously, the required park will necessitate movement of the SWM Pond #1/Block 3 westward and assume 1.34 ha of Block 2.	TJCG / MTE	Park size has been increased to the minimum requirement of 2.0ha. Additional trail systems are also proposed along with a 2.41ha school site which provides ample community amenity space. The revised plan was presented to the City, Region and GRCA on February 24, 2022. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design.
5.	**Urban Design Guidelines**		

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City of Cambridge: Parks, Recreation & Culture, Paul Willms		
Comments	**Consultant**	**Response**
a. Page 20, Figure 9 – Proposed River Mill Community Open Space System The figure contains a trail network which is not consistent with the Overall Development Plan (e.g. the segment from corner of Speedsville/Maple Grove to the park/SWM blocks is missing. The red outline on the snip shows the anticipated trail network from the previous Trail Concept Plan and Overall Development Plan.  Figure 9: Proposed River Mill Community Open Space System	TJCG / NAK	Urban Design Guidelines document has been updated accordingly to reflect the revised site design. Park size has been increased to the minimum requirement of 2.0ha. Additional trail systems are also proposed along with a 2.41ha school site which provides ample community amenity space. The revised plan was presented to the City, Region and GRCA on February 24, 2022. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design.

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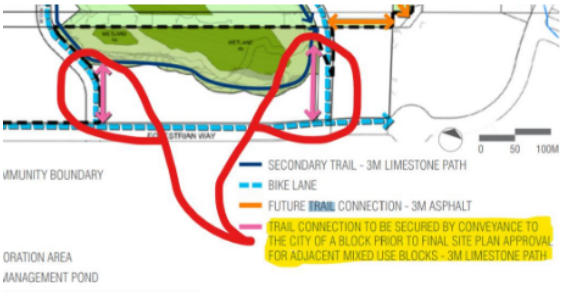
Comments	**Consultant**	**Response**
The Figure notes a number of different tail hierarchies, timing, and surfaces: ○ The City requires the entire network to be built with 3m asphalt trails (no other surfaces are acceptable) as per the Trails Master Plan and as implemented in the adjacent Hunt Club subdivision. ○ The trail network will be built by the developer following grading and prior to housing development / early in the site's development along with SWM and roads, and no "future trail connections" will be accepted. ○ The Figure notes a condition within the Legend from the previous Hunt Club subdivision which was put in place prior to the connecting roads being contemplated (next to the pink arrows in the snip below) – the purpose of the condition (and the notation in this Legend above) was to ensure a trail connection between the Arriscraft subdivision/Equestrian Way and lands to the north. Those connections have been secured through the roads. No conveyance of lands or a block prior to final site plan approval is required as confirmed in November 2019 Park Operations comments on modifying the Arriscraft subdivision. 	TJCG / NAK	Urban Design Guidelines document has been updated accordingly to reflect the revised site design. Park size has been increased to the minimum requirement of 2.0ha. Additional trail systems are also proposed along with a 2.41ha school site which provides ample community amenity space. The revised plan was presented to the City, Region and GRCA on February 24, 2022. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design.

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City of Cambridge: Parks, Recreation & Culture, Paul Willms			
Comments		**Consultant**	**Response**
	b. Page 23, urban design recommendations for the Stormwater Pond. The author contemplates retaining walls, armourstone, benches and seating, and terrace planting. These are not acceptable design elements (e.g. the City does not place benches in SWM pond areas) and will increase assets of the City unnecessarily when graded and vegetated slopes are adequate and sustainable. These elements may be suitable to the privately-owned condominium SWM pond along Maple Grove but are not supported for the publicly-owned SWM pond whose design aesthetic is generally as a naturalized space with native plant material and accesses which double as walking surfaces. The accesses should be asphalt (no additional trails required) and join to park pathways / trail system. Street furnishings (page 30) within the SWM pond are not supported.	TJCG / NAK	Urban Design Guidelines document has been updated accordingly to reflect the revised site design. References to design elements within the public SWM Pond block have been removed. Park size has been increased to the minimum requirement of 2.0ha. Additional trail systems are also proposed along with a 2.41ha school site which provides ample community amenity space. The revised plan was presented to the City, Region and GRCA on February 24, 2022. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design.
	c. 4.2 Gateway Elements. Gateway elements on public property are not supported and represent a level of service over and above what the City currently maintains. Any gateway elements proposed in Landscape Submissions will be required to be on private (condominium) properties and will not be accepted on any boulevard, open space, park or public properties.	TJCG / NAK	Urban Design Guidelines document has been updated accordingly to reflect the revised site design. References to Gateway Elements have been revised.

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City of Cambridge: Senior Planner – Environmental, Kathy Padgett			
Comments		**Consultant**	**Response**
1.	**Wooded Area Removals, (Pages 7, 88)**		
	The EIS states that the City approved the wooded area clearing along the south side of Maple Grove Road. Regional staff actually approved the clearing in this specific area because upon inspection the wooded area designated as Core Environmental Feature was mostly buckthorn, dead ash, Manitoba Maple, declining Scots Pine and some shrubs. City staff are unable to approve the removal of a Regional Core Environmental Feature. Please revise.	NRSI	Text has been added on page 12 of the River Mill – Phase 4 EIS Addendum to note that the Region approved the clearing based on the invasive and low-quality of the vegetation present in the community along Maple Grove Road.
	It should be noted that this approval did not extend to the wooded area along both the west and east sides of the Middle Creek Corridor where additional tree removals were undertaken for agricultural purposes as noted in the EIS.	NRSI	This has been noted. The River Mill – Phase 4 EIS Addendum (page 12) does not state that the clearing along the west and east sides of the Middle Creek Corridor was completed with agency approval.
2.	**PSW Removals and Habitat Creation**		
	The EIS states (pages 7, 88) that the former aggregate extraction license led to the removal of the southern portion of an isolated wetland within the Maple Grove Road PSW. The EIS goes on to state that the aggregate extraction license was surrendered in August 2017 and that the wetland removal occurred sometime between September 2016 and May 2017. Aerial imagery available to the City shows the wetland still in-tact in May 2018, after the aggregate extraction license had been surrendered. It appears this PSW was removed after the aggregate extraction license had been surrendered and without a permit from the GRCA.	NRSI	To the best of our knowledge the statement in the River Mill – Phase 4 EIS Addendum (pages 10, 11), that the wetland removal was completed in two stages, is accurate, with the portion of wetland within the aggregate extraction license area being removed between September 2016 and May 2017, and the wetland area immediately to the north of the aggregate extraction license area, which was still intact in May 2018, being removed before June, 2019.
	The remainder of the isolated wetland to the north, as well as portions of the Maple Grove Road PSW along both the west and east sides of the Middle Creek Corridor were also subsequently removed. These PSWs were also removed without a permit from the GRCA.	NRSI	This comment has been acknowledged. No further action required at this time.
	These design features are designated Natural Open Space System in the Cambridge Official Plan and the southern portion of the isolated wetland within the Maple Grove Road PSW is zoned Open Space through the 2021 EIS prepared by Savanta Inc. that was done in support of the Hunt Club – Phase 3 development.	NRSI	It is noted on page 6 of the Phase 4 EIS Addendum that portions of the Subject Lands are designated Natural Open Space.

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City of Cambridge: Senior Planner – Environmental, Kathy Padgett			
Comments		**Consultant**	**Response**
	The proposed wetland and forest habitat creation plan (page 55, 57) proposes to create a wetland approximately 0.83ha in area within the floodplain south of Maple Grove Road as a form of compensation for the loss of the isolated wetland within the Maple Grove PSW. However, City staff cannot ignore that PSW wetlands were removed without permits and the proposed created wetland is located in an undevelopable floodplain which results in a net increase in developable lands. Further discussion is required with the proponent and staff at the City, Region and GRCA regarding the wetland removals and the proposed compensation.	NRSI / TJCG / Owners	A meeting was held with the City, Region and GRCA to discuss the concept plans, and specifically wetland compensation/restoration, on February 24, 2022. A new approach to wetland compensation was determined. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design. This proposed Wetland and Forest Habitat Creation and Restoration Plan will create a 1.53ha wetland on the west side of Middle Creek, with 0.4ha outside the floodplain, and a 0.74ha wetland on the east side of Middle Creek.
3.	**Locally Significant Natural Areas (LSNAs)**		
	Map 1 shows the LSNAs (whether existing or removed) on the subject lands, but the text doesn't refer to the LSNAs except for a mention of the hedgerows in Section 1.3.1. LSNAs should be described under Section 5.0.	NRSI	LSNAs are discussed in the Phase 4 EIS Addendum (Section 1.0) and are shown on Map 1. A discussion of LSNAs has also been added to Section 3.7.
4.	**Species at Risk**		
	Provide any future correspondence with MECP regarding the candidate bat maternity roosting trees prior to any removals.	NRSI	All the candidate bat roost trees within the Phase 4 Subject Lands are to be retained/protected, therefore further correspondence with the MECP will not be necessary.
	Provide the "Notice of Butternut Impact" to be filed with the MECP prior to any grading within the vicinity of Butternut JUG-006. The butternut planting and maintenance plan (p 13) will be required as a condition.	NRSI	The text on pages 17 and 39 and in Table 5 (page 54) of the Phase 4 EIS Addendum has been updated to note that "a Notice of Butternut Impact" must be filed with the MECP prior to any grading within the vicinity of the Butternut (JUG-006). A minimum of 10 Butternut seedlings and 10 other associated native trees will need to be planted to compensate for this harm."
5.	**Trails**		
	The draft plans of subdivision identify a trail system in the buffers. Is the reference in the report to 'pathway construction' intended to be an analysis of the proposed trail system? If so, it becomes lumped in with 'unauthorized trails' and is not very clear. For clarity, a subsection on the planned trail system and its proposed location in the buffer, impacts and associated mitigation should be included in the EIS.	NRSI	All proposed trails, shown on Map 4 of the Phase 4 EIS Addendum, are outside the significant natural features and, when located within wetland buffer areas, are within the outer portion of the wetland buffers.

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City of Cambridge, Development Engineering – Adam Ripper		
Comments	**Consultant**	**Response**
Stormwater Management & Storm Servicing		
3:1 slopes are shown in the two new stormwater management ponds. As per the City's SWM policy 7d) a maximum slope of 5:1 is permitted around the entire perimeter of the pond.	MTE	The design of proposed Stormwater Management Facility 1 (SWMF1) has been designed to meet the City's SWM Policies and Guidelines (May 1997) and MOE design requirements
The 5:1 slope is to extend from the limit of the maximum extended detention elevation to the permanent pool & below the permanent pool for a minimum horizontal distance of 3.0m after which 3:1 slopes can be used to the bottom of the pond.	MTE	Same as above.
Section 5.3.2 states that the River Mill drainage enters the existing south SWM facility via the north inlet from the swale located on the Phase 3 Block 3. This swale was only intended to convey flows from the Phase 3 Block 3 and the preliminary development plan for this block would preclude any River Mill drainage from being directed to this outlet.	MTE	We appreciate and agree with the comments. The related content in the SWM report has been revised.
Major flows from catchment 203 being directed to the existing south facility at Street E will be conveyed to the west forebay inlet via Ward Ave and Shaver Rd.	MTE	Same as above.
Major flows from catchment 205 directed to existing south facility At Street A will be conveyed to east forebay inlet via Equestrian Way & Ridge Rd.	MTE	Same as above.
Minor flows for any drainage from the River Mill Development to the existing south facility was intended be conveyed via the Equestrian Way/Ridge Road storm sewers to the east forebay inlet.	MTE	Minor flows for Storm Catchment 203 are proposed to be directed south of Equestrian Way to the future storm sewer on Ward Avenue. Storm sewer sizing along Ward Avenue, Shaver Road and the existing west forebay inlet was reviewed and design changes has been coordinated with the relevant consultants (WalterFedy). A copy of the storm sewer design sheets has been included as part of this submission.
There is a 525mm storm sewer which will now re-direct minor flows from Block 20 and Street E across Equestrian Way. The sizing of the Ward Ave, Shaver Rd, and west forebay inlet is to be reviewed due to the additional River Mill drainage being conveyed to this inlet.	MTE	Same as above.

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City of Cambridge, Development Engineering – Adam Ripper		
Comments	**Consultant**	**Response**
Section 5.3.2 of SWM Report indicates that an additional 0.9ha of drainage area is being directed to the existing south facility forebay. However, table 5.4 is indicating reduced ponding and storage requirements for the south pond from the previous design?	MTE	The previous design assumed relatively high imperviousness (75-85%) for the development areas around Wetland 3 and 4. The current design applied imperviousness 65-75%, which is more realistic for multi-family and mix-use residential development. The current draft plan also includes a school block (imperviousness 45%), which further brings down the overall imperviousness. In addition, the previous design discharged all drainage from these areas directly to the south pond, while the current design proposes infiltration galleries for the blocks within the draft plan to infiltrate roof runoff. This reduces the drainage volume to the south pond.
In section 5.4.4 of the SWM Report note that the required 0.3m freeboard has still been provided in the existing North Pond even though higher ponding elevations have been proposed as a result of the additional flows to the existing facility.	MTE	Addressed in Stage 5 Submission.
Sanitary Servicing		
The Functional Servicing Reports references SCADA data flows which was used to provide a preliminary assessment if the pumping station capacity.	MTE	New data has been collected and flows are based on flow monitoring of influent to the Sanitary Pumping Station conducted in 2021. Please refer to the attached updated Sanitary Pumping Station Technical Memo for more information.
Public Works has indicated this data was for the period of May 2018-Dec 2019 which may not accurately reflect the build-out of Hunt Club and Boxwood Subdivisions which have occurred since Dec 2019.	MTE	Same as above.
Staff notes that based on design flows the 50 l/s allocation for Hunt Club was reached with the completion of Phase 1 and Phase 2.	MTE	The design flow for Hunt Club Phases 1 and 2 is 39.42 L/s. Based on the 2021 flow monitoring results, typical sanitary flows ranged from 2-12 L/s.
As such Hunt Club is in the process of undertaking flow monitoring at the station to confirm the availability of residual capacity for Blocks in Phase 3. This data should be incorporated into the Sanitary Pumping Station Capacity Analysis for Phase 4 & 5.	MTE	Same as above.

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City of Cambridge, Development Engineering – Adam Ripper		
Comments	**Consultant**	**Response**
When calculating residual capacity for Phase 4 & 5, the School flows and full build-out of the of the original Hunt Club Subdivision (incl. Phase 3) and Boxwood Industrial Subdivision will need to be considered.	MTE	Residual capacity for River Mill Phases 4 and 5 is based on the pre-determined allocation for the River Mill Community (50L/s). The Boxwood Subdivision has a separate sanitary flow allocation that does not affect the River Mill residual capacities. As per the Sanitary Pumping Station Technical Memo, the measured peak sanitary flows from 759 units located within River Mill Phases 1 and 2 ranges between 2-12 L/s. The proposed peak sanitary flow for Phase 5 of the River Mill Community is 7.0 L/s. Depending on staging of Phase 4, it is anticipated that the allocated 50 L/s will be reached at some point during development of Phase 4, at which time the sanitary pumping station upgrades will be conducted. Sanitary flow monitoring should be continued to determine when the allocated capacity is close to crossing the 50 L/s threshold.
For example, there have been large industrial buildings recently completed in the Boxwood subdivision which are yet to be occupied and the 310 units for Phase 3 referenced in the Sanitary Sewer Analysis and Sanitary Pumping Station Technical Memo doesn't seem accurate based on the applications received to date.	MTE	Same as above.
Recent applications have been made for Blocks 2,3 and 4 in Phase 3 totaling 690 units (D13/20, SP20/20, and R02/21) and that doesn't include Blocks 6 or 7.	MTE	Same as above.
If upgrades to the Sanitary Pumping Station are required as a result of this Development then the Developer will be required to enter into a cost-sharingor credit for service agreement with the City for this work.	MTE	This comment has been acknowledged.
A CFSA will need to be requested by the Developer if the SPS upgrades needs to proceed in advance of the City's capital forecast for these works, which is currently 2025.	MTE	This comment has been acknowledged.
The upgrades required to increase the SPS capacity are outlined in the MTE Phase 2 SPS Design Brief. This includes installation of three additional pumps at the station, twinning of the forcemain from the old Boxwood SPS location to receiving sewer, and upsizing of the gravity sewer on Cherry Blossom at Fountain Street.	MTE	This comment has been acknowledged. MTE notes they agree with the statement.

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City of Cambridge, Development Engineering – Adam Ripper		
Comments	**Consultant**	**Response**
The Sanitary Sewer Analysis and Sanitary Pumping Station Technical Memo will also need to assess the Phase 1 and Phase 2 sanitary sewers. As per City Standards sewers are not to be designed over 95% full pipe capacity.	MTE	The capacity of the sanitary sewer between MH23A-MH24A was previously addressed within the River Mill East (Phase 5) Functional Servicing Report. Sanitary sewer capacity was also assessed downstream from the Phase 4 lands. It is recommended that a 38.6m-200mm diameter sanitary sewer on Equestrian Way between MH41A and MH40A be upsized to a 300mm diameter sewer. Efforts to address this issue have been coordinated with WalterFedy (consultants for the Equestrian Way works).
In particular the following sewers are to be assessed: • MH94A-MH96A (450mm at 0.50%) on the Sanitary Easement. This sewer was at 94% capacity in the original design and shown at 96.13% capacity in the latest Phase 3B application (R02/20).	MTE	Same as above.
In our R02/20 comments Staff suggested reviewing the original sewer design assumptions. In particular the 393 p/ha density for some of the multiple blocks was conservative and seems high based on the permitted zoning	MTE	Population density has been calculated based on the Region of Waterloo Land Budget. The maximum density for any of the multiple blocks is 366 p/ha.
Also, the original design assumptions for the adult lifestyle block may have been conservative as well based on the preliminary MTE design sheet (7597 population in original design).	MTE	The total design population of the adult lifestyle block (Phase 4) is assumed to be 4129, utilizing unit density rates derived from the Region of Waterloo Land Budget.
Watermain		
The Water Distribution network diagram in the Water Distribution Analysis is not showing the existing 400mm main on Speedsville Rd. (south of Equestrian Way) or the existing 200mm Equestrian Way main (west of JCT-39024). This should be shown on the diagram.	MTE	This is shown on Figure 2.1 in the Water Distribution Analysis.
The modelling has indicated that the Phase 4 & 5 can be serviced without the extension of the Speedville Rd. watermain between Heroux Devtek Drive and Equestrian Way. Please confirm that the modelling has not assumed this connection. If this is the case then this Speedsville Rd. watermain connection will not be completed as part of this Development.	MTE	We agree and the updated water distribution analysis indicates that the connection is not required in order for Phase 4 to be adequately serviced.

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City of Cambridge, Development Engineering – Adam Ripper		
Comments	**Consultant**	**Response**
General		
Servicing alignments on the proposed 20m right-of-ways (including Briardean Road) are to follow City Standard C106 and the 18.5m right-of-ways are to follow C107-1. These details are to be referenced in the FSRs.	MTE	Proposed Streets A and B are proposed to be 20.0m right-of-ways and are referenced to follow City of Cambridge Standard C106 in the FSR. Proposed Streets C and D are proposed to be 18.5m right-of-ways and are referenced to follow City of Cambridge Standard C107-1 in the FSR.
Provide a full-size general service plan for the Development.	MTE	Servicing plans are presented on Figures 5.1-5.5 of the Functional Servicing Report. A full-size general service plan will be provided during the Final Design stage.
The pavement structure outlined in Table 3.2 of the FSR does not conform to the City Standards for surface and binder course thicknesses. Refer to Table 2.4 – Pavement Structure Design of the City's Design Guidelines.	MTE	The pavement structure has been modified to conform to Table 2.4 of the City Design Guidelines and referenced in the FSR.
Grading & Grading Permit		
Both the Phase 4 Functional Servicing Reports states that 0.75m separation between footings and groundwater have been provided. However, figure MS11.1 indicates that this won't be achieved throughout the subdivision (for example Block 4 in Phase 4 and Block 1 in Phase 5)? This should be further discussed and clarified.	MTE	The comment regarding inadequate groundwater separation in Block 4 was in relation to the previous Draft Plan of Subdivision. As seen in the updated MTE Drawing MS11.1 in the FSR, adequate separation between footings and groundwater is achieved throughout the development.
For example, are slab on grade foundations required on Phase 4 Block 4 similar to what has been proposed on Block 5? Staff notes that infiltration was not proposed in this Block due to the high groundwater levels.	MTE	Same as above.
There was also some previous discussion that a separate groundwater collection system might be required? Is this no longer anticipated to be required?	MTE	A groundwater collection system is not required for Phase 4 as there is adequate separation to footings.
Add some % grade slope labels to the preliminary grading plans at the following locations: • On Street A near Equestrian Way • On Street E near Equestrian Way • On Street A near Speedsville Road • On Street B near Speedsville Road • On the Development Block grade arrows	MTE	As requested, additional slope labels have been added to the Preliminary Grading Plans.

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City of Cambridge, Development Engineering – Adam Ripper		
Comments	**Consultant**	**Response**
The permit fee is calculated on the area of site to be graded. The permit application has noted 8.7ha area which doesn't seem match the area shown in the grading plan. The fee will be calculated as follows: Permit Fee = $500(for initial 0.5ha) + $100 per additional ha (or fraction thereof) over 0.5ha.	MTE	Addressed under the Grading Permit submission
A sediment basin should be used for Area 1 as oppose to a sediment trap given that the drainage area is over 2.0ha and that it outlets to a regulated wetland.	MTE	Addressed under the Grading Permit submission
Specify a 450mm thickness for the mud mat construction entrance.	MTE	Addressed under the Grading Permit submission
The first 10m of the mud mat (from the street) is to be 50mm diameter clear stone and the remainder of the length is to consist of 150mm diameter clear stone.	MTE	Addressed under the Grading Permit submission
The mud mat is to be the full length of the entrance or a minimum width of 10m. At the Speedsville Rd access the silt fencing is to but up to the mat.	MTE	Addressed under the Grading Permit submission
Provide a cost estimate for the erosion and siltation control measures. A security in the amount of 50% of the ESC measures costs will be a requirement of the grading permit.	MTE	Addressed under the Grading Permit submission
An inspection with City Staff is to be coordinated once the ESC measures are installed. Full grading activities are not to commence until the inspection is completed.	MTE	Addressed under the Grading Permit submission
Summary		
These Development Engineering comments are to be addressed prior to providing a recommendation for approval of the Draft Plan of Subdivision and Zoning By-law amendment.	MTE	This comment has been acknowledged.
A resubmission of the Grading Permit Application addressing the Grading Permit comments above, Permit Fee, and ESC securities will be required for Grading permit issuance.	MTE	Resubmission of Grading Permit Application has been made.

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City of Cambridge: Transportation Engineering, Juliana Petrovich		
Comments	**Consultant**	**Response**
The Transportation Impact Study supporting the proposed zoning recommends traffic signals at intersections on Speedsville Road in close proximity which may not be feasible without operational issues.	Paradigm	Proposed intersections are approximately 150m apart with no direct driveway accesses proposed.
Ensuring a neighbourhood has adequate commercial amenities creates a more complete neighbourhood reducing vehicular trips by facilitating combined trips and active transportation.	TJCG / Tate	Proposed retail is located centrally to the overall development with trail, sidewalk and bike lane access to promote active transportation. The retail location is in keeping with previously approved applications and the Retail Commercial Market Demand Study prepared by Tate Economic Research. A response letter has also been prepared by Tate in response to retail related comments.
Stronger consideration should be given to a mix of uses in this neighbourhood to create a more complete community that isn't heavily reliant on a personal vehicle to get around and get essentials. Active transportation connections to destinations should be a consideration.	TJCG	Phase 4 proposes 3,290m of 3m wide Multi-Use Trail and 1,670m of Bike Lanes in addition to the sidewalk network to promote active transportation for residents. The mix of uses includes, but is not limited to, Single Detached, various Townhouse built forms and Apartment Dwellings.

City of Cambridge: Fire Department, Mark Yantha			
Comments		**Consultant**	**Response**
1.	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. In order to successfully operate a fire truck under emergency conditions, a minimum 6m-width roadway must be provided. With this in mind, parking on the roadway would be a major concern/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.	TJCG / MTE	Both the proposed 18.5m right-of-way cross section for Streets C and D, and the proposed 20.0m right-of-way cross section for Streets A and B, allows for a curb-to-curb width of 9m as per City Standard C107-1 and C106, respectively. A traffic management and signage plan will be prepared during the Final Design stage that designates at least one side as a no parking zone.

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City of Cambridge: Fire Department, Mark Yantha			
Comments		**Consultant**	**Response**
2.	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.		This comment has been acknowledged. No further action required at this time.
3.	Ensure roadways comply with 3.2.5.6. of the Ontario Building Code.	TJCG / MTE	Roadway cross-sections comply with 3.2.5.6 of the OBC, clearances and widths will be provided while maintaining a maximum grade change of 1 in 12.5 over 15.0m.
4.	The Ontario Building Code gives a definition for a street as follows: *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.* This needs to be kept in mind when widths are determined for the roadways.	TJCG / MTE	All streets within the development have a minimum 9m curb-to-curb width.
5.	Ensure fire hydrants are present and operational.	MTE	Fire hydrant locations will be determined during the Final Design stage, with a maximum spacing of 75m.
6.	Ensure tow connections to public throughfares if road/cul-de-sac over 100 m in length.	TJCG	No cul-de-sacs are proposed within this development.
7.	Further review of properties at Site Plan Stage taking into account the following: a. Show all fire hydrants b. Indicate all Fire Department connections (if sprinklered) c. Label/indicate all Fire Routes d. MUI signs c/w details shall be provided e. Further review at site plan stage		This comment has been acknowledged. No further action required at this time.

Response/Status Legend
Comment Addressed
Comment To Be Addressed
Clause In Sales Agreement
Clause In Subdivision Agreement

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Energy+ Inc., Helen Robinson			
Comments		**Consultant**	**Response**
OR08/20: Energy+ Inc., has no objection to the Applicant's request for a Zoning By-law Amendment and Official Plan Amendment to facilitate the construction of a residential development with two new municipal roads. The Applicant would be required to enter into a Service Agreement with Energy+ Inc., to establish the terms and conditions to service the proposed multi residential development at 100% cost.		**Jeff / Lawyers**	Service Agreement Required This comment has been acknowledged. No further action required at this time.
Comments for the proposed draft plan will include:			
1.	The Owner/Applicant will be required to enter into an agreement with Energy+ Inc. to establish the conditions and costs to provide electrical service to this development at 100% Owner/Applicant cost. Please allow a minimum of 6 months for determination of service needs.	**Jeff / Lawyers**	Service Agreement Required This comment has been acknowledged. No further action required at this time.
2.	The Owner/Applicant will be responsible for all costs associated with the relocation and/or upgrade of the existing electrical plant, if required as a result of this proposal.	**Jeff**	This comment has been acknowledged. No further action required at this time.
3.	The Owner/Applicant will be required to grant easements to the satisfaction of Energy+ Inc., if required as a result of this proposal.	**Jeff / Lawyers**	Energy+ Easement This comment has been acknowledged. No further action required at this time.
Refer to Energy+ Inc. Residential Spec book at www.energyplus.ca Hydro poles/guy wires and anchors / padmount transformers / switching units/service pits/street light poles to be 1.5m from driveway entrances/curbs. Relocation at 100% owners' expense.			This comment has been acknowledged. No further action required at this time.
All planting near Energy+ owned overhead power lines and padmount equipment must be installed in accordance to: http://www.esasafe.com/assets/image/Tree-Planting.pdf			This comment has been acknowledged. No further action required at this time.
Must maintain required clearances (ESA &Energy+) from existing overhead electrical plant			This comment has been acknowledged. No further action required at this time.
Owner/Applicant may be required to provide ESA clearance calculations to existing overhead electrical distribution equipment. Calculations must be signed off by a P. Eng.			This comment has been acknowledged. No further action required at this time.
As per Energy+ Inc., Current Conditions to Service, latest edition, only one service per property is permitted.			This comment has been acknowledged. No further action required at this time.

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Energy+ Inc., Helen Robinson		
Comments	**Consultant**	**Response**
Additional comments may be provided when the application is submitted.		This comment has been acknowledged. No further action required at this time.

Grand River Conservation Authority, John Brum		
Comments for Phase 4: OR08/20 (30T-21101)		
Comments	**Consultant**	**Response**
Based on a review of submitted information in regards to the above-noted draft plan and subdivision and related official plan, zoning by-law amendment applications, please be advised that the GRCA is not supportive of the currently proposed draft plan submission and is not in a position to provide a recommendation for approval of these draft plan, official plan amendment, and zoning by-law amendment applications at this time. The draft plan will need to be revised. There are a number of items that need to be addressed and/or clarified by the applicants. The following comments provide further details of these items for your review and consideration.	TJCG / NRSI	A meeting was held with the City, Region and GRCA to discuss the concept plans, and specifically wetland compensation/restoration, on February 24, 2022. A new approach to wetland compensation was determined. The Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design. The EIS has been updated to address comments received from the GRCA, City and Region. Please see the EIS Addendum.
General Information and Technical Review		
Resource Issues		
Information currently available at this office indicates that Middle Creek and its associated Regional Storm floodplain traverse the subject lands. The subject lands also contains portions of the Maple Grove Road Provincially Significant Wetland (PSW) Complex and their regulated allowances (refer to the enclosed map). Consequently, the subject lands are regulated by the GRCA under Ontario Regulation 150/06 (Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Regulation). Please further note that no new development/site alteration would be supported or permitted by the GRCA within the floodplain and wetland areas.	TJCG / NRSI	It is noted on page 6 of the Phase 4 EIS Addendum that the "The wetlands, creek, and floodplain are regulated by the GRCA under Ontario Regulation 150/06 (2013)." Only habitat creation and restoration is proposed to occur within the floodplain. No development/site alteration is proposed within existing wetland areas.

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Grand River Conservation Authority, John Brum			
Comments for Phase 4: OR08/20 (30T-21101)			
Comments		**Consultant**	**Response**
Resource Planning/Policy Comments			
1.	The submitted draft plan drawing (prepared by T. Johns Consulting Group Ltd.) proposes that portions of residential blocks (Blocks 2 and 7) and Street 'B' will replace the central PSW on the subject lands. On January 25, 2019, in response to a pre-consultation application (D35/18), the GRCA provided the following comments to the City of Cambridge: *The Grand River Conservation Authority (GRCA) is not supportive of the submitted Conceptual Block Plan since it proposes new development within a Provincially Significant Wetland, a floodplain area, removes portions of some natural heritage features, and does not provide any buffers to some of these natural heritage features. The applicants are required to revise their development proposal on the subject lands to exclude development from the identified floodplain, wetland areas, and provide appropriate buffers to these natural heritage features.*	TJCG / NRSI	Through discussions with the City, Region, and GRCA, an updated plan for wetland restoration and creation and an updated concept plan were developed. This proposed Wetland and Forest Habitat Creation and Restoration Plan will create a 1.53ha wetland on the west side of Middle Creek, with 0.4ha outside the floodplain, and a 0.74ha wetland on the east side of Middle Creek. It was agreed that created wetland would be more ecologically valuable if it were contiguous with other existing/restored natural heritage features along the Middle Creek Corridor rather than isolated in its original location.
	This current draft plan proposal continues to show development in the PSW by removing this feature and replacing it with residential blocks and a road. The GRCA is not supportive of this proposal since it would be contrary to GRCA policies and the Provincial Policy Statement (PPS, 2020) Natural Heritage policies (2.1.4), whereby Development and site alteration shall not be permitted in significant wetlands in Ecoregions 5E, 6E and 7E1.	TJCG / NRSI	See response above

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Grand River Conservation Authority, John Brum			
Comments for Phase 4: OR08/20 (30T-21101)			
Comments		**Consultant**	**Response**
	According to the Environmental Impact Study (EIS) that was prepared by Natural Resources Solutions Inc. (NRSI), they note that the central PSW was impacted by vegetation clearing and grading due to farming activity on the northern parcel and aggregate licensed activities on the southern parcel. NRSI further notes that 'these activities appear to have occurred between September, 2016 and May, 2017, prior to the August 21, 2017 closure of aggregate extraction operations and therefore were permitted under the aggregate extraction license under the Aggregate Resources Act. However, according to the GRCA's review of the available air photos from 2016 until 2018, shows that the central PSW was still present on the landscape and partially present in 2019. This indicates to the GRCA that the clearing and grading activities occurred well after the surrender of the aggregate license in 2017 and subject to GRCA regulations. In 2019, GRCA staff attended on site with NRSI, Region of Waterloo, and City of Cambridge staff to review the wetland and woodland boundaries in support of this draft plan and the preparation of the EIS. At that time, GRCA staff noted that the central PSW had been completely impacted by recent clearing and grading. The GRCA has no record of any permission being granted for the removal of this wetland under Ontario Regulation 150/06.	TJCG / NRSI	It is acknowledged that a portion of the central PSW was removed without permission under Ontario Regulation 150/06. Through discussions with the City, Region, and GRCA, a Wetland and Forest Habitat Creation and Restoration Plan has been proposed that will create a 1.53ha wetland on the west side of Middle Creek, with 0.4ha outside the floodplain, and a 0.74ha wetland on the east side of Middle Creek. It was agreed that created wetland would be more ecologically valuable if it were contiguous with other existing/restored natural heritage features along the Middle Creek Corridor rather than isolated in its original location.
	According to the Region of Waterloo's Official Policies Plan and the City of Cambridge Official Plan, the central PSW is designated as a Core Environmental Feature (CEF). It is our understanding that no EIS was prepared and no approval was granted to support the removal of this CEF by the Region of Waterloo. Further, the PSW is currently zoned Open Space in the City's Zoning By-law and this application proposes rezoning this area for development.	TJCG / NRSI	See response above

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Grand River Conservation Authority, John Brum			
Comments for Phase 4: OR08/20 (30T-21101)			
Comments		**Consultant**	**Response**
	NRSI proposes to mitigate the losses of past vegetation removals and grading in other woodlands and the loss of this PSW/CEF by creating a wetland and forest habitat area within a portion of an open space block (Block 28). According to the EIS, the wetland area to be created is 0.87 ha in size compared to the 0.89 ha of the PSW that was impacted. We also note that this portion of Block 28 is floodplain. The floodplain area is not developable land. It would appear that the applicants have now gained 0.89 ha more land for development.	TJCG / NRSI	See response above
	Please be advised that this wetland creation proposal would not be considered compensation and is not supported by current GRCA wetland policies. We would request that the applicants revisit this wetland creation proposal. If the GRCA were to entertain potential wetland creation, with the support of both the Region of Waterloo and the City of Cambridge, we would recommend that the applicants consider other areas on the draft plan that are currently shown as developable blocks, including the restoration of the PSW in its original location.	TJCG / NRSI	See response above
2.	On March 5, 2021, GRCA staff conducted a drive-by site visit to the subject lands and observed recent fill and grading activity immediately adjacent to the wetland areas. The GRCA has no record of any permits being granted for these works and could be deemed a violation of Ontario Regulation 150/06. We request that all filling/grading cease on these lands and that the applicants provide clarification as to why these works are occurring without the required approvals from the GRCA.	TJCG / NRSI	This comment has been acknowledged. No further action required at this time.
3.	We request that the applicants clarify the size of Block 28. According to the draft plan drawing, the plan notes two different sizes: 11.87 ha and 11.71 ha.	TJCG	The drawing has been corrected accordingly.

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Grand River Conservation Authority, John Brum			
Comments for Phase 4: OR08/20 (30T-21101)			
Comments		**Consultant**	**Response**
Natural Heritage Comments			
Required Comments			
4.	If GRCA staff were to support wetland restoration/creation within the draft plan, we will require further details that clearly demonstrate that the soils and hydrology are suitable to sustain a diverse wetland community. This would also include providing pre- and post-development water balance calculations for the proposed wetland creation area.	NRSI / MTE	The SWM report has been revised to further discuss the water balance for the wetlands, please refer to Section 5.5.1. The groundwater contours show that the potential groundwater discharge to Wetland 5 is mostly from areas outside the proposed development. For Wetlands 1b and 1c, potential groundwater discharge from area within Phase 5 can be generally maintained under proposed conditions, as discussed in the SWM report. The EIS Addendum includes a discussion of soils, existing groundwater conditions, recommended plantings, and post-development water balance. Please see Sections 4.1, 4.2, and 5.3.2 for details.
5.	According to the Hydrogeological Assessment completed by MTE, "an upward vertical gradient was calculated for the mini-piezometers installed within Middle Creek in the vicinity of Wetlands 1b, 1c, and 5, indicating that shallow groundwater discharges to the creek." Additional water balance calculations are needed to confirm that infiltration and groundwater discharge toward these wetlands will be maintained. Pre- and post-development infiltration values for catchment 4750 appear to be missing from the revised SWM report (see Appendix F, Water Balance).	NRSI / MTE	See comment response above. Catchment 4570 will remain undeveloped and therefore the pre-development infiltration rate will be maintained. The EIS Addendum provides an impact analysis and ecological interpretation of the pre- and post-development water balance. Please see Section 5.3.2. for details.
6.	The EIS notes that surface runoff toward wetland 1b will be reduced by 949 m3 during the 8 months, non-winter period or 12 m3 per rain event. According to MTE's preliminary stormwater management report, annual surface runoff toward this wetland will be reduced by 50% (from 7,264 m3 to 3,655 m3), which is substantial. Monthly water balance calculations are not provided in Appendix F of MTE's report. Monthly surface runoff calculations are needed to verify NRSI's hydrologic impact assessment.	NRSI / MTE	The SWM report has been revised to further discuss the water balance for wetland 1b and 1c, please refer to Section 5.5.2. The annual surface water input deficit has now been reduced to about 40%. The monthly water balance has been provided. The results show that the surface water input can be maintained during the growing season. The EIS Addendum includes an updated section that specifically addresses the surface water runoff deficit to wetlands 1b/1c, using data provided in MTE's SWM Report (2022c). Please see Section 5.2.2 Surface Flow, Groundwater Water Balance and Water Quality.

Grand River Conservation Authority, John Brum			
Comments for Phase 4: OR08/20 (30T-21101)			
Comments		**Consultant**	**Response**
7.	Although the EIS has identified several wetland inclusions within the plantation area, these areas were not mapped by NRSI. By contrast, the GRCA had previously mapped additional wetland area within the plantation area, to reflect the findings of the Hespeler West Subwatershed Study. We recognize that the current EIS reflects current conditions and provides a more detailed inventory of wetlands within this area. We also suggest that wetland restoration or enhancement measures could be implemented within this area as well.	NRSI	The wetland inclusions were mapped on Map 3 in the original EIS. This comment has been acknowledged. No further action required at this time.
8.	The EIS does not specify a minimum development setback for Middle Creek. However, we note that a 30 m setback from the creek is shown on the Overall Development Plan (Drawing ODP1-1) attached to the EIS. A minimum 30 m setback from the watercourse is supported by GRCA staff.	NRSI	Page 26 of the Phase 4 EIS Addendum states that an enhanced 30m buffer on either side of Middle Creek within the Subject Lands is recommended. This 30m buffer is shown on Map 4 and is adhered to in the latest concept plan.
9.	Setbacks from created or enhanced wetlands are not specified in the EIS and remain unclear. We request that a minimum 30 m setback be established from all wetlands located on the subject lands, regardless of their origin.	NRSI / TJCG	As discussed on page 25 of the Phase 4 EIS Addendum, minimum 30m buffers are recommended for all PSWs within the Subject Lands, including the proposed created wetlands. The only exception to this is where the proposed created wetlands border the SWM facilities. In these areas the outer 15m of the 30m wetland buffer overlaps with the SWM facility.
10.	Detailed plans will be required to support public trails within wetland buffer areas. We request that any trail be located on the outer portion of the buffer areas and that preliminary grading plans be reviewed to provide a preliminary trail plan and assessed by NRSI staff.	NRSI / MTE	Noted. Trail design will follow the guidelines of the City of Cambridge Trails Master Plan (City, June 2010). The proposed trail system is shown on Map 4 of the Phase 4 EIS Addendum. All trails in the vicinity of wetlands are located in the outer portion of the wetland buffer areas.

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Grand River Conservation Authority, John Brum			
Comments for Phase 4: OR08/20 (30T-21101)			
Comments		**Consultant**	**Response**
Advisory Recommendations/Comments			
11.	With respect to Section 7.5.2 (During Construction Monitoring) of the EIS: a. We recommend that refueling and storage areas be situated more than 30 m from any wetland or watercourse. b. We recommend that construction vehicles avoid all natural areas, including wetlands and watercourses. c. We recommend that erosion and sediment control measures be inspected weekly and after heavy rainfall events.	NRSI	These additions to the During Construction Monitoring have been included in the Phase 4 EIS Addendum (pages 60 and 61).
12.	We recommend the installation of a monitoring well for any location proposed for wetland creation/restoration on the subject lands. Groundwater levels collected in this well would inform the wetland design and landscaping plans.	NRSI / MTE	The EIS Addendum includes a discussion of groundwater monitoring and soils results from wells installed in the area where the western created wetland is proposed. A discussion is also provided for the monitoring well closest to the eastern created wetland. Please see Section 4.1 for more details.
13.	The monitoring plan outlined in the SWM Report is supported by GRCA staff.		This comment has been acknowledged. No further action required at this time.
14.	We recommend that a detailed biological monitoring plan be developed and implemented to help assess the success of proposed wetland creation/enhancement efforts.	NRSI	A 3-year monitoring and maintenance schedule has been proposed to ensure that the habitat creation is successful and the plan's objectives are achieved. The first year of monitoring is proposed to commence in June of the calendar year following native species plantings (Stage 3 planting).
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, official plan, and zoning by-law amendments, the applicants are required to revise the draft plan to exclude development within the PSW and further address the above-noted GRCA comments.			This comment has been acknowledged.

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Grand River Conservation Authority, John Brum		
Comments for Phase 4: OR08/20 (30T-21101)		
Comments	**Consultant**	**Response**
Plan Review Fees		
The GRCA's 2021 plan review fees are established on a base fee of $2,340 plus $1,220 per net hectare fee. At the time of submission, 70% of the combined base fee and per net hectare fee is required. Please note that these combined fees are capped at a maximum of $30,000 and includes the review of the related official plan and zoning by-law amendments. As such, the required fee for this draft plan of 28.7 net hectares is $21,000.00 payable to the GRCA. With a copy of these comments, the applicants will be sent an invoice for this fee. Prior to issuance of draft plan conditions, the remaining 30% (or $9,000.00) will be required from the applicants. Please be further advised that additional fees will be required prior to draft plan approval and any subsequent clearance of draft plan conditions for registration. Our current permit and plan review schedule is available under the Planning & Regulations section on our website at www.grandriver.ca.	**Owners / TJCG**	This comment has been acknowledged. No further action required at this time. Required Fee will be invoiced to the applicant by the GRCA. Current Fee is $2,410 plus 1,255 per net hectare at initial submission. With the area being 28.7ha at submission, the fee cap is hit. $21,000.00 is due now. $9,000.00 is due prior to issuance of Draft Plan Conditions.
We trust the above is of assistance on this matter. Should you have any further questions, please do not hesitate to contact the undersigned at ext. 2233 or jbrum@grandriver.ca.		This comment has been acknowledged. No further action required at this time.

Waterloo Region District School Board		
Comments	**Consultant**	**Response**
This plan seeks to permit the development of approximately 1864 residential units. The unit mix includes some single detached houses but is predominantly medium and high-density dwellings in the form of townhouse and apartment units. To permit the proposed development an Official Plan Amendment and Zoning Bylaw Amendment are also required.		This comment has been acknowledged. No further action required at this time.
Understanding unit types and bedrooms counts helps us determine the projected student yield from new development. Any information that can be provided to confirm unit count by type will support our ongoing review of accommodation needs in the area.	TJCG	Number of bedrooms is unknown at this time, however, the information will be shared once it is known.

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Waterloo Region District School Board			
Comments		**Consultant**	**Response**
The proposed new Hunt Club Elementary School (Equestrian Way) has not yet received funding approval from the Ministry of Education and the opening date is unknown at this time. This plan is currently within the North Cambridge (Hunt Club) Development Area which has yet to be assigned a holding school for grades JK-6, 7-8 or 9-12, as such we consider this DA assignment 'to-be-determined'. Every effort is made to ensure that purchasers moving into development areas are aware of the status of the Development Area and of future schools. We endeavor to assign DA's to holding schools prior to occupancy or even sales. Please ensure WRDSB Planning staff continue to be notified about the status of this application as it advances through the approval process. For more information about Development Areas please visit us online - www.wrdsb.ca/planning/holding-schools/			This comment has been acknowledged. No further action required at this time.
The WRDSB supports active school travel and we ask that pedestrian needs be considered in the review of all development applications to ensure the enhancement of safety and connectivity. In particular, we support the creation of paths that will be winter maintained to support students in their walk to school or the bus stop.			This comment has been acknowledged. No further action required at this time.
Since this area is currently designated as a Development Area and students will be transported to schools outside the area until a new school can be constructed we ask that consideration be given to planning for bus stops. As is outlined in the conditions below, school buses operated by STSWR will not travel on privately owned or maintained right-of-ways to pick up students. STSWR may have additional comments on the placement of stops and the infrastructure needs to best support bus stops.			This comment has been acknowledged. No further action required at this time.
The WRDSB asks that following conditions of draft plan approval be imposed:			
1.	That the owner supply erect and maintain a sign (at its expense and according to the WRDSB's specifications) affixed to the permanent development sign for the Plan advising prospective residents that students may be directed to schools outside of their neighbourhood.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.

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Waterloo Region District School Board			
Comments		**Consultant**	**Response**
2.	That the owner agree in the Subdivision Agreement to notify all purchasers of residential units and/or renters of same, by inserting the following clauses in all offers of Purchase and Sale/ Lease: a. "Whereas the Waterloo Region District School Board (WRDSB) may designate this parcel of land as a Development Area for the purposes of school accommodation, and despite the best efforts of the WRDSB, sufficient accommodation may not be available for all anticipated students. You are hereby notified that students may be accommodated in temporary facilities and/or bussed to a school outside the area, and further, that students may, in future, be transferred to another school." b. "In order to limit liability, public school buses operated by the Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up students, and potential busing students will be required to meet the bus at a congregated bus pick-up point."	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
3.	Prior to final approval, the WRDSB is to be advised in writing by the Approval Authority how the above conditions have been satisfied.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
Please be advised that any development on the subject lands is subject to the provisions of the Waterloo Region District School Board's Education Development Charges By-law 2016 or any successor thereof and may require the payment of Education Development Charges for these developments prior to issuance of a building permit.			This comment has been acknowledged. No further action required at this time.
The WRDSB reserves the right to comment further on this application. If you have any questions about the comments provided please contact the undersigned.			This comment has been acknowledged. No further action required at this time.

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Waterloo Catholic District School Board			
Comments		**Consultant**	**Response**
The WCDSB is requesting the designation of an elementary school site within River Mill West Phase 4 (30T-21102) area that meets the following requirements: • Approximately 2.42 ha (6.0 ac.) in size. • Regular shape (either a square or rectangle). • Frontage along two streets, including a principal frontage of no less than 120 metres and a secondary frontage of 60 metres.		TJCG / Owners	Discussions with the WCDSB were held and the Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design including the required 2.41ha school site. The revised plan was shared in a meeting with the City, Region and GRCA on February 24, 2022 where the design in principle was agreed upon.
We understand that this school site was not previously communicated, however, the board has experienced significant increases in enrolment in the past five years a recent study of future enrolment throughout the jurisdiction has identified the need for additional elementary pupil accommodation in this area.		TJCG / Owners	Discussions with the WCDSB were held and the Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design including the required 2.41ha school site. The revised plan was shared in a meeting with the City, Region and GRCA on February 24, 2022 where the design in principle was agreed upon.
We request that the Region impose the following conditions on 30T-21101 (Phase 4), in addition to the board's standard conditions also provided herein which are applicable to both the Phase 4 and Phase 5 plans:		TJCG / Owners	Discussions with the WCDSB were held and the Overall Development Plan and Concept Plans have been updated accordingly to reflect the mutually agreed upon design including the required 2.41ha school site. The revised plan was shared in a meeting with the City, Region and GRCA on February 24, 2022 where the design in principle was agreed upon.
1.	That prior to final approval, the SUBDIVIDER agrees to provide the CITY'S Director of Planning with a letter from the Waterloo Catholic District School Board (the "Board") indicating that satisfactory arrangements have been made with the Board to acquire Block _ (the "School Block") for school purposes. The School Block shall contain not less than __ hectares. (Block and hectares to be determined and currently left blank intentionally).	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
2.	That the School Block be zoned to permit an elementary school.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
3.	That the School Block not be subject to any municipal, Grand River Conservation Authority or other agency regulation that might place the school in or near hazard lands or hazard sites as defined by Section 3.1.5 of PPS 2020	TJCG / Lawyer	Becomes a condition of the subdivision agreement.

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Waterloo Catholic District School Board			
Comments		**Consultant**	**Response**
4.	The School Block shall be registered concurrent with registration of the street upon which the School Block fronts.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
5.	That the SUBDIVIDER shall agree in the Subdivision Agreement, in wording satisfactory to the Board, to: a. Grade the School Block and in doing so compact, fill with clean material, replace any topsoil disturbed in the grading process and sod/seed the lands to the specifications determined by the Board; b. Remove all trees and buildings on the School Block as determined by the Board; c. Remove stockpiled topsoil from the School Block within 30 days of written notice by the Board, and in doing so compact, fill with clean material, replace any topsoil disturbed in the grading process and sod/seed the School Block to specifications determined by the Board; d. Construct a 1.5 metre high black vinyl chain link fence, along all boundaries of the School Block, except for the road frontage, to the specifications determined by the Board, prior to the issuance of building permits for any lands abutting the School Block; and e. Provide the foregoing at no cost to the Board.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
6.	That the SUBDIVIDER shall submit, at no cost to the Board, a report from a qualified consultant concerning: a. The suitability of Block __ for school construction purposes, relating to soil bearing factors, surface drainage, topography and environmental contaminants; and b. The availability of natural gas, hydro, water supply, storm sewer and sanitary sewer services adequate for the construction of an elementary school.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
7.	That the SUBDIVIDER shall agree in the Subdivision Agreement in wording acceptable to the Board that the services referred to in Condition 3(b) shall be installed to the mid-point of the frontage of the elementary school site, or in a location otherwise determined by the Board, at no cost to the Board.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.

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Waterloo Catholic District School Board			
Comments		**Consultant**	**Response**
8.	That prior to final approval, the SUBDIVIDER shall submit to the Board for review and approval, a copy of the final engineering plans as approved by the City of Cambridge which indicate the storm drainage system and the overall grading plans for the complete subdivision area.	**TJCG / Lawyer**	Becomes a condition of the subdivision agreement.
9.	That the following warning clause be included in all offers of purchase and sale or lease/rental agreements for all residential dwelling units within this plan until such time as a permanent school is assigned: *"The Waterloo Catholic District School Board advises all prospective purchasers and tenants of residences within the River Mill West community that unless the provincial funding model provides sufficient funds to construct a new school, there can be no assurance as to the timing of a new school construction nor a guarantee that an elementary school will be provided within this subdivision notwithstanding the designation of an elementary school site"*	**TJCG / Lawyer**	Becomes a condition of the subdivision agreement.
Conditions applicable to Phase 4 and Phase 5 approvals:			
1.	That Education Development Charges shall be collected prior to the issuance of a building permit(s).	**TJCG / Lawyer**	Becomes a condition of the subdivision agreement.
2.	That the developer and the Waterloo Catholic District School Board reach an agreement regarding the supply and erection of a sign (at the developer's expense and according to the Board's specifications) affixed to the development sign advising prospective residents about schools in the area.	**TJCG / Lawyer**	Becomes a condition of the subdivision agreement.
3.	That the developer shall agree in the in the subdivision agreement to advise all purchasers of residential units and/or renters of same, by inserting the following clause in all offers of Purchase and Sale/Lease: *"In order to limit liability, public school buses operated by the Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up students, and potential busing students will be required to meet the bus at a congregated bus pick-up point."*	**TJCG / Lawyer**	Becomes a condition of the subdivision agreement.

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ATTACHMENT 1: DRAFT CONDITIONS OF APPROVAL (PARKS)		
Draft Condition	**Consultant**	**Response**
Conveyance of Properties to the City		
1. THAT prior to conveyance of any properties to the City:		
a. All properties proposed to be conveyed to the City including park blocks, OS blocks, SWM blocks, reserves, roads and right of ways, walkway blocks, etc.) are to be highlighted on a draft plan map.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
b. A peer review of the phase 1 and phase 2 Environmental Site Assessments may be required and if so would be conducted by the City at the developer's cost. Should the City require an RSC for any or all blocks to be conveyed to the City following this peer review the developer will undertake to do so in order to clear this condition of approval. The City may consider allowing registration to proceed prior to acknowledgement of the RSC but will not convey properties until acknowledgment from the Ministry is received.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
c. Properties must be free of debris including obstructions, deposited waste, tree branches and trunks from tree removal operations, fill material, garbage, and any material and debris obtained from the development lands or elsewhere on the lands to be conveyed to the City of Cambridge. The developer will not bury debris on lands to be conveyed to the City as a way of disposing of debris.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
d. The developer will restrain other persons from depositing debris including obstructions, deposited waste, tree branches and trunks, fill material, garbage, and any material and debris obtained from the development lands or elsewhere on the conveyance lands. Should any dumping occur the developer is responsible for clean up and costs associated with remediating the lands to a condition suitable for conveyance and consistent with the relevant Official Plan policies;	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
e. The developer will not temporarily stage nor store construction materials, vehicles or equipment, fuel storage tanks, washrooms, topsoil or grading piles on lands to be conveyed to the City.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.

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ATTACHMENT 1: DRAFT CONDITIONS OF APPROVAL (PARKS)			
Draft Condition		**Consultant**	**Response**
	f. A letter of credit in the amount of $50,000 will be deposited prior to registration to ensure compliance within three (3) days of written direction. The letter of credit will be released upon completion of all obligations associated with the properties to come into City ownership and final Assumption Inspection.	**TJCG / Lawyer**	Becomes a condition of the subdivision agreement. Letter of Credit prior to registration
Trails Design, Financing and Construction			
2.	THAT the developer design, finance and construct an approximately 3000 m trail network. The developer will provide the following to the City's satisfaction:		
	a. Trail to be depicted as a coloured line on the Draft Plan of Subdivision for the purposes of consultation and Council approval;	**TJCG / Lawyer**	Becomes a condition of the subdivision agreement.
	b. The detailed design of the trail network to be provided through the Construction drawings / Engineering submissions and applicable Landscape submissions for City review and approval;	**TJCG / Lawyer**	Becomes a condition of the subdivision agreement.
	c. Construction timing for trails and the entire trail network should follow grading, SWM pond and road construction, precede housing development and fencing of OS blocks;	**TJCG / Lawyer**	Becomes a condition of the subdivision agreement.
	d. Slopes will be kept below 5%, cross slopes below 2%, and all other accessibility standards will be confirmed with a note on the applicable engineering drawing. Trails will be 3m wide HL3 asphalt with no more than 15% RAP (unless otherwise required to be wider, e.g. for SWM accesses or a Service Corridor or Walkway, or narrower, e.g. in order to implement site-specific solutions or comply with EIS recommendations or permit approval conditions).	**TJCG / Lawyer**	Becomes a condition of the subdivision agreement.
	e. The proponent will consult with the Cambridge Cycling and Trails Advisory Committee (CCTAC) and with the Accessibility Advisory Committee once engineering submissions have been approved in principle by City staff and details are known. Changes and additional amenities and elements (e.g. rest areas, benches, etc.) may be required to be added following consultation at the developer's expense;	**TJCG / Lawyer**	Becomes a condition of the subdivision agreement.

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	f. The required trail network is comprised of off-road 3m asphalt trails but should seamlessly connect to other components of the active transportation system including the walkway blocks, multi-use road trails, park pathways, and SWM accesses. The plan will demonstrate safety features for pedestrians (e.g. mid-block crossings, truncated dome plates at intersections, etc.), or utilize aspects from walkway blocks, SWM accesses, street multi-use-trails, and park paths. Some segments of the trail network will also consist of entrances and corridors to, and through, SWM blocks and these should also meet accessibility standards (e.g. asphalt not turfstone or stonedust). No catchbasins at the base of ramps and within the path of travel of pedestrians will be accepted. Concrete drop curbs and concrete aprons in the boulevard between the street and sidewalk where all trails meet streets, and with no on-street parking in the vicinity where trails meet streets may be required in specific locations;	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
	g. the plan should provide Details for associated "trail fixtures" such as gates, signage, lighting, and fencing, and associated "trail infrastructure" such as swales, drainage, culverts, retaining walls, boardwalks, railings etc. as applicable and incorporated into the required cost estimate;	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
	h. the developer will obtain all approvals from applicable agencies and authorities for trail grading and construction (e.g. for within buffer areas, regulated areas) such as the Grand River Conservation Authority;	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
	i. cost estimates for trails and associated fixtures, infrastructure, and trailhead development will be required and will form a letter of credit within the Subdivision Agreement;	TJCG / Lawyer	Becomes a condition of the subdivision agreement.

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Draft Condition	**Consultant**	**Response**
j. the City's fencing policy requires OS and park blocks to be fenced from future private property and this is addressed through a separate condition of approval requiring a Fence Plan and security; however, the trails plan may need to create an entrance from a private property block or other solutions to address Crime Prevention Through Environmental Design (CPTED) issues with particularly long stretches of trail without exits;	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
k. Trails will be a minimum of 5m off of private property lines with the intent to be as far as possible from property lines. Trails should not abut fences. In instances where it is technically impossible to be a minimum of 5m off of property lines, the developer will provide measures such as privacy fencing, screening plantings, or grade changes. In limited situations where trails unavoidably must be above private property grades the developer will provide screening vegetation and/or other methods of providing privacy which may include the provision of wooden fencing (instead of the City standard chain link fencing);	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
l. Trail corridors will be examined within the scope of any required EIS. If the trail network was not within the scope, an EIS addendum will be required to inform the corridor and any mitigation recommendations for the trails network where it potentially impacts natural areas. EIS Recommendations will be incorporated into the Landscape Submissions and Engineering Submissions associated with the trail network. Trails should not proceed within buffers with steep grades and it is generally preferable to have trails at the base of a buffer closest to the feature, or 10-15 m within features (i.e. woodlots not wetlands), and with mitigating measures identified in the EIS for tree removals, preservation of interior habitat, avoidance of sensitive habitat, and other impacts, rather than attempting to build a trail on a steep slope within a planted buffer and which would require additional extensive retaining walls and/or railings;	TJCG / Lawyer	Becomes a condition of the subdivision agreement.

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ATTACHMENT 1: DRAFT CONDITIONS OF APPROVAL (PARKS)			
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	m. purchasers will be notified of the trail alignments through the large onsite subdivision sign, in the sales centre presentation materials and communicated directly to purchasers who abut a trail, on purchase agreements (i.e. specific clauses within purchase agreements are required). Photos, pdfs, and copies of purchase agreement clauses are required to clear this condition of approval	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
	n. the plan and construction Details will include the appropriate wayfinding signage bollard to the City's Standard at key locations to note lengths of trail, destinations, slopes, and other accessibility standard requirements.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
Parkland Dedication			
3.	THAT parkland dedication will be provided consistent with the Official Plan and Planning Act. Parkland dedication will also include the following conditions consistent with Official Plan policy 7.8 3e) ("the lands should be dedicated in a condition suitable for parkland development in accordance with any applicable standards of the City"):	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
	a. parkland dedication requirements include the following: i. Land in the form of Park Block "X" at 3.13 hectares; ii. Cash-in-lieu for the balance of parkland dedication (0.14 hectares); and, iii. An appraisal will be required at the developer's cost to the satisfactory of Property Services with an "effective" date as per the *Planning Act* (day before draft plan approval).	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
	b. The applicant will provide approximate phasing and timing information for the City to institute the applicable Development Charge and capital budget project associated with development of the park.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.

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c. The applicant will provide a vehicle ramp/gate/access and grading, stone-picking, and seeding and also a cost estimate of these elements in order to inform a letter of credit within the Subdivision Agreement in order to dedicate the lands in a condition suitable for parkland development.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
d. Agricultural operations will cease 3 years prior to seeding.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
e. Infrastructure not related to park function will not be permitted within the park block or its frontage including infiltration galleries, utility boxes, or any other works and engineering submissions featuring such works will be rejected.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
f. No storage of topsoil, tree removals, burying of wastes, staging of materials, or parking of equipment, or any other unauthorized use will not be permitted on any lands to come into City ownership whether they have been conveyed to the City or not including the park block.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
g. Grading plans, and engineering works, will be to the satisfaction Park Operations within the Park Block. Engineering works should only be associated with the park's function and not for other purposes especially if they impact on the user experience of the park. Grades will not exceed 5% slopes and lands will be "developable" for future programming. Excessive grades calling into question the viability or intended programming of the park will require the applicant to remediate the situation to Accessibility standards and may involve re-grading, retaining walls and switchback installations for paths, or other means at the proponent's sole expense and to achieve the amount of lands as dedicated in the Draft Plan of Subdivision; and, if lands are deemed unprogrammable / undevelopable and thereby excluded through grading the applicant will be required to provide additional cash-in-lieu to make up for the deficiency in undevelopable and unprogrammable lands. Some periphery property grades which exceed slopes guidelines, but do not affect the program or developability of the lands, are acceptable and not subject to remediation or compensation through cash-in-lieu of parkland.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.

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	h. The City will design and develop the park.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
Fence Plan			
4.	A fence plan will be submitted prior to registration. A 1.5m high black vinyl chain link fence to the City Standard be provided on Open Space, Park, Walkway, and SWM Blocks for new residential boundaries to these blocks. Existing residential and other types of lands abutting City lands will also be fenced and these situations will be resolved through the fence plan. A letter of credit will be provided within the Subdivision Agreement for fence installation. Fences will be installed 6" (0.15m) on lands to be conveyed to the City.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
Communicating Parks, Trails, and Fencing to Purchasers			
5.	THAT fencing, future parks, trails, walkways, open space areas be communicated to applicable purchasers in the sales centres, on purchase agreements, and other means such as signage noting future trail alignment adjacent to lots. These aspects will also be communicated at public meetings and on the Draft Plan of Subdivision (e.g. park blocks, coloured line for any trails) so that existing residents are informed.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.

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ATTACHMENT 1: DRAFT CONDITIONS OF APPROVAL (PARKS)			
Draft Condition		**Consultant**	**Response**
Street Trees			
6.	THAT prior to registration of the plan, a calculation of PUBLIC street frontage divided by 12 multiplied by the Subdivision Agreement Schedule tree cost ($750/tree) be provided as a letter of credit. A detailed street tree planting plan should then be submitted concurrent with the Composite Utility Plan (i.e. street servicing (hydro boxes, light standards, narrow boulevards, etc.) and driveway plans. Conflicts should be identified and alternatives proposed to achieve a treed streetscape as large gaps in the streetscape will not be accepted and the minimum amount of street trees will have to be provided. Street trees in higher density boulevard subdivision areas, park blocks, mixed use areas, or areas with low infiltration may require structural soils, vaulting, silva cells, or other methods of providing enough soil volume and room for trees to achieve maturity. The calculation (tree every 12m of frontage) will produce a total amount of trees required. Should the later Detailed Street Tree Plan/Composite Utility Plan indicate conflicts, the applicant may pursue other means to achieve a treed streetscape and/or canopy tree cover including those noted in the Engineering Manual (i.e. plant on private property, plant in the park), produce "double rows" of trees, large spaded trees (at a ratio of 6 street trees for every spaded tree) or cash-in-lieu of trees for the number of tree unable to be established.		TJCG / Lawyer	Becomes a condition of the subdivision agreement.
Stormwater Management Pond and Landscape Plan			
7.	THAT Stormwater Management (SWM) Blocks be designed, graded and landscape to		
	a. Seamlessly incorporate trail segments and connections if applicable;	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
	b. Naturalize over time with appropriate native species and seed mixes to graded conditions with minimal ongoing operational or mowing maintenance;	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
	c. Incorporate pot sizes that are minimum 3 gallon for shrubs but may be smaller for emergent vegetation;	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
	d. eradicate invasives if present including Black Locust or other aggressive vegetation that threatens the applicant's investment.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.

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ATTACHMENT 1: DRAFT CONDITIONS OF APPROVAL (PARKS)		
Draft Condition	**Consultant**	**Response**
e. No Salix (willow) species will be accepted on Landscape Plans;	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
f. Where SWM Blocks abut private properties, grades shall be consistent with neighbouring grades to one metre inside the SWM Block to facilitate mowing along the fence line. Aggressive vegetation, such as Rhus typhina, is not acceptable in proximity to property boundaries;	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
g. Maintenance accesses should be seamlessly and dually incorporated as design elements for the trails network where applicable including associated gates and other elements. Maintenance accesses must be a minimum of 5m off private property lines.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
h. The City's Standard SWM addressing sign and gates to be installed at developer's cost (and provided as Details on appropriate Engineering submission) as well as letter of credit within the subdivision agreement for all accesses to the SWM. Any accesses that act also as pedestrian walking routes will not have catchbasins within the paths of travel.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
i. Seeding mixes favouring pollinators are required and the Landscape Plan should indicate the particular seed mix for review and approval by the City.	TJCG / Lawyer	Becomes a condition of the subdivision agreement.

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Region of Waterloo: Community Planning		
Comments	**Consultant**	**Response**
River Mill Development Communities is proposing a residential plan of subdivision as **Phase 4** on 45 hectares (111.2 acres) of land located at 800 Briardean Road, vacant lands south of 800 Briardean Road and 1285 Speedsville Road in the City of Cambridge. This plan is for approximately 1864 residential units and includes blocks for single detached, cluster townhouses, apartments and mixed-use dwelling units, stormwater management and park and open space.		This comment has been acknowledged. No further action required at this time.
Note: With the exception of 800 Briardean Road, the lands within the proposed Phase 4 plan are subject to draft approved plans of subdivision 30T-12103 (formerly Hunt Club) and 30T-12104 (formerly Arriscraft). The Region will close plan of subdivision file 30T-12103 and the Owner/Developer will be notified. Further, a draft plan modification to plan 30T-12104 will be required to remove Blocks 21, 22 and Street "E" from the draft approved plan as these lands are now proposed to be developed through the Phase 4 plan.	TJCG / **Owners**	We acknowledge that the Region will close Subdivision 30T-12103. The Draft Plan Modification required to remove Block 1 from draft plan 30T-12104 will be initiated in the coming months. There are a few last details being worked out in an effort to prepare a comprehensive submission.
The subject lands are designated Low/Medium Density Residential with Site Specific Policy Areas 8.10 (A), (C) and (D), High Density Residential with Site Specific Areas 8.10 (A) and (B), Future Urban Reserve and Natural Open Space System in the City of Cambridge Official Plan. The lands are zoned A1, RM3, RM3/CS5 and OS1 with site-specific provisions. The proposed Official Plan and Zoning By-law Amendments are to re-designate and rezone the lands to appropriate Official Plan and Zoning categories in order to permit the proposed higher density residential development.		This comment has been acknowledged. No further action required at this time.
While the two proposed development areas Phase 4 and Phase 5 are being reviewed and processed concurrently, it should be noted that these areas may not develop in that order. Phase 5 may proceed to approvals ahead of Phase 4 should the planning matters for Phase 5 be addressed ahead of those for Phase 4.		This comment has been acknowledged. No further action required at this time.
DELEGATED AUTHORITY COMMENTS Conseil Scolaire Catholique Mon Avenir, the Conseil Scolaire Viamonde, Rogers Cable Communications Inc., Telecom (Telus) and Canada Post have not responded to this circulation. By copy of this letter, these agencies are asked to provide any comments they may have as soon as possible. Hydro One has no comments or concerns.		This comment has been acknowledged. No further action required at this time.

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Region of Waterloo: Community Planning		
Comments	**Consultant**	**Response**
Bell Canada Bell Canada's comments received in an email of January 28, 2021 for plan of subdivision 30T-21102 were provided to the City and the Owner/Developer separately. 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 both plans of subdivision.	TJCG / Lawyer	Becomes a condition of Draft Approval
Enbridge Gas Inc. (Union Gas Limited) Enbridge Gas Inc. advised in their emails of January 26, 2021 that, as a condition of draft plan approval for both plans of subdivision, the Owner/Developer will need to provide Union Gas with the necessary easements and/or agreements for the provision of gas services to these plans.	TJCG / Lawyer	Becomes a condition of Draft Approval
Energy+ Inc. In a letter dated February 4, 2021 for plan of subdivision 30T-21101, Energy Plus Inc. advised the Owner/Developer will be required to enter into an Agreement with the Hydro Authority to establish the conditions and costs to provide electrical service to this development at 100% cost. 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 or upgrade 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 for both plans of subdivision.	Jeff / Colm Eng.	The agreement and easements will be arranged accordingly.
Grand River Conservation Authority (GRCA) GRCA's comments of April 15, 2021 both plans of subdivision were provided to the City and the Owner/Developer separately. At this time, the GRCA is not in a position to support draft approval of the proposed plan of subdivision. The GRCA's comments must be addressed prior to draft plan approval of both plans of subdivision.	TJCG / NRSI	This comment has been acknowledged. The design and supporting reports have been updated to address comments received to-date. Please see comment responses to specific comments received for further clarification on how comments/concerns have been addressed.

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Region of Waterloo: Community Planning		
Comments	**Consultant**	**Response**
<u>Regional Comments</u>		
Consistency with Provincial and Regional Policies The proposed plan is subject to the A Place to Grow: Growth Plan for the Greater Golden Horseshoe and the Provincial Policy Statement (PPS). The lands are designated in the Regional Official Plan (ROP) as Urban Area and Urban Designated Greenfield Area. These ROP designations permit a full range of urban uses, including residential developments of various types and densities. The ROP requires that Urban Designated Greenfield Areas be planned to meet or exceed a minimum density of 55 residents and jobs per hectare. The Planning Justification Reports (T. Johns Consulting Group, November 2020) note that the proposed subdivisions meet this density. Regional staff will confirm the density of each plan once the plans have been revised to address various agency comments and re-submitted to the Region for review.		This comment has been acknowledged. No further action required at this time.
Neighbourhood Commercial As part of the Region's Pre-submission Comments (January 31, 2019), the Region provided the following comments with respect to the proposed residential concept plan for these lands: "The applicant should consider including a neighbourhood or convenience commercial block within the proposed plan, possibly on the property at 800 Briardean Road in order to achieve the P2G objectives of a *complete community* by providing the existing and future residents of this large residential neighbourhood with a more convenient access to local store(s) and services."	Tate	Based on the analysis summarized in the TER Report, it is concluded that a convenience-oriented retail commercial development of between 15,000 and 25,000 square feet is warranted in the community. The TER Report indicates the preferred location for this development. It is to be located on Equestrian Way, at and near the intersection of Speedsville Road and Equestrian Way. In our opinion, this quantum and location of retail commercial space will provide future residents of this community convenient access to local stores and services. For detailed response, please see memo prepared by Tate Economic Research Inc. entitled *Response to River Mill Retail Study Region of Waterloo and City of Cambridge Comments*, dated January 19, 2022. The response to this comment is found starting on Page 2 under the heading "TER Response to Comment 1."

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Region of Waterloo: Community Planning		
Comments	**Consultant**	**Response**
A Retail Commercial Market Demand Study (Tate Economic Research, May 1, 2020) was submitted with the proposed subdivision, which assessed the need and viability of commercial uses on lands located at the northern and southern corner of Speedsville Road and Equestrian Way within the adjacent Arriscraft plan 30T-12104. Overall, the study recommends a ground floor convenience-oriented commercial development that focuses on serving the immediate neighbourhood, and between 15,000 and 25,000 sq. ft. with tenant mix such as food, retail, restaurants, health and wellness and financial services. As this recommended commercial development site is not included in the proposed draft plan, the Owner/Developer needs to address how the above recommendation for the commercial development will be realized as part of the overall River Mill community. Are the adjacent subdivision lands zoned for a minimum of 15,000 sq. ft. of gross floor area of neighbourhood commercial land uses? This can be addressed/confirmed by City staff or by the planning consultant in an Addendum to the Planning Justification Report.	TJCG / Tate	For detailed response, please see memo prepared by Tate Economic Research Inc. entitled *Response to River Mill Retail Study Region of Waterloo and City of Cambridge Comments*, dated January 19, 2022. The response to this comment is found starting on Page 2 under the heading "TER Response to Comment 2."
Phase 4 and 5 Draft Plans Regional staff requests the following additional revisions to the two draft plans of subdivision: • Open Space Block 28 is labeled with two separate areas in hectares – the area of this block must be confirmed and labeled correctly on the draft plan and be consistent with the Land Use Schedule on the plan. • The label 'Residential' for all blocks within the two plans should be revised to more specific unit types (e.g. single detached, townhouses, multiple residential, apartments, mixed use, etc.).	TJCG	Draft Plan drawings have been updated accordingly.
Further, there is no information in the submission on how Streets "A" and "E" will be extended through Briardean Road (currently owned by the City). This process needs further discussion with City staff and should be confirmed prior to draft approval of the Phase 4 plan. The road extensions through Briardean may need to be identified on the draft plan.	TJCG	Drawings have been revised to include the lands requested. Through discussions with City and Regional Staff, it has been decided that the City will sign an undertaking of sorts allowing the developer to file complete the applications on the City-owned lands on their behalf.
Environmental Planning The subject lands include, and directly abut, the following Core Environmental Features designated by the ROP: Maple Grove Provincially Significant Wetland Complex and Significant Woodland.	TJCG / NRSI	This comment has been acknowledged. No further action required at this time.

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Comments	**Consultant**	**Response**
Core Environmental Features are afforded protection through the policies of the ROP. There have been removals of and impacts to portions of the Core Environmental Features within the northeast area of the subject lands that were undertaken without the benefit of a permit or appropriate permission. The documents submitted in support of the plans of subdivision, including the "River Mill – Phases 4 and 5, Cambridge, Environmental Impact Study (EIS)" (NRSI, November 2020) and the Planning Justification Reports (T. John Consulting Group, November 2020), have not satisfactorily addressed the removal and disturbance of Core Environmental Features. In accordance with ROP Policy 7.A.11, the limits of the Core Environmental Features (and their functions) will be considered to be the limits that are identified through the Greenlands Network of the ROP (Map 4).	TJCG / NRSI	It is acknowledged that Core Environmental Features within the northeast area of the Subject Lands were undertaken without the benefit of a permit or appropriate permission. Through discussions with the City, Region, and GRCA, an updated plan for Wetland and Forest Habitat Creation and Restoration Plan and an updated concept plan were developed. The proposed Wetland and Forest Habitat Creation and Restoration Plan will create a 1.53ha wetland on the west side of Middle Creek, with 0.4ha outside the floodplain, and a 0.74ha wetland on the east side of Middle Creek. In addition, two forest communities comprising an area of 1.87ha will be restored, with one 1.32ha community around the western created wetland and one 0.56ha community on the east side of Middle Creek, upland of the eastern created wetland.
Subsequent to the submission of the proposed draft plan of subdivision applications, revised conceptual plans to address the above concerns were submitted (NRSI Memo, May 27, 2021). Environmental Planning staff advise that the conceptual proposal from NRSI can be supported, in principle, with modifications and the submission of additional supporting documentation.	NRSI	The Phase 4 EIS Addendum seeks to provide the additional supporting documentation for the updated concept plan and proposed Forest Habitat Creation and Restoration Plan.
Although there are no technical concerns identified at this time with the EIS, Regional staff cannot support the approval of the plans of subdivision as submitted. Once the plans are modified to incorporate the additional wetland (and/or woodland) features, a revised EIS or addendum should be provided to assess the proposed configuration, address the wetland and woodland, and their ecological functions as they existed prior to removal and disturbance, and provide an assessment of how the additional features will address the loss of features and functions. **The revised EIS or Addendum must be submitted prior to draft plan approval of both plans of subdivision.**	NRSI	The Phase 4 EIS Addendum seeks to provide the additional supporting documentation for the updated concept plan and proposed Forest Habitat Creation and Restoration Plan

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Comments	**Consultant**	**Response**
Hydrogeology and Water Programs (HWP) Hydrogeology and Water Programs (HWP) staff have reviewed the Preliminary Stormwater Management Report (MTE, 2020), the Chloride Impact Assessment (MTE, 2020) and the Hydrogeological Characterization Report (MTE, 2020). The following requirements will need to be satisfied **through conditions of draft plan approval for both plans of subdivision:** 1. A final detailed Stormwater Management Plan will be required to the satisfaction of the Region, City and GRCA. 2. The Owner/Developer will need to enter into a Subdivision Agreement with the City to oversize lot-level infiltration galleries by 15% to account for future reductions in efficiency and downspout disconnections. (This requirement is noted in the SWM report.) 3. The Owner/Developer will need to enter into a Development Agreement with the Region / City to complete a Salt Management Plan (SMP) for all multi-residential/townhouse blocks in both plans of subdivision, as part of a future Site Plan application for each block.	NRSI / MTE	Becomes a condition of Draft Approval This comment has been acknowledged.
As part of the two Zoning By-law Amendments, Regional staff request that a provision be included in the final zoning by-law that prohibits geothermal energy systems on the subject lands.	TJCG	Discussions are underway with Regional staff who are reviewing mapping to confirm if the requested zoning by-law provision is required for this development. A meeting with Geothermal experts has been offered to the Region in case it may be of assistance.
<u>Water Services - Plan 30T-21101 Phase 4</u>		
Water Services staff have reviewed the "River Mill Subdivision – River Mill West (Phase 4), Preliminary Functional Servicing Report" (MTE Consultants, October 9, 2020), "River Mill Subdivision – Preliminary Water Distribution Analysis" (MTE Consultants, October 16, 2020) and the "Planning Justification Report – 1134 Hunt Club Road, 1285 Sneedville Road and Part of 800 Briardean Road, River Mill West (Phase 4)" (T. Johns Consulting Group Ltd., November 2020) and provide the following comments.	MTE	This comment has been acknowledged. No further action required at this time.

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Region of Waterloo: Community Planning		
Comments	**Consultant**	**Response**
The reports have identified the proposed Phase 4 plan will be serviced within pressure zone Cam 2W and have concluded there will be direct connections to the existing 450mm diameter watermain on Speedsville Road, the existing 200mm diameter watermain on Equestrian Way.	MTE	This comment has been acknowledged. No further action required at this time.
One location in Phase 4 may require the installation of an individual PRV near the south end of Block 26. This will be confirmed as part of Site Plan approval process.	MTE	This comment has been acknowledged. No further action required at this time.
The modeling results also confirmed fire flow results can be met at the minimum MECP pressures of 140kPa for all the proposed land uses. The conclusion recommended the preparation of a final Water Distribution Analysis during the final design of the subdivision.	MTE	This comment has been acknowledged. No further action required at this time.
As a condition of draft plan approval for both plans of subdivision, the Owner/Developer will be required to submit a final Water Distribution Analysis to the satisfaction of the Region of Waterloo and the City of Cambridge.	MTE	Becomes a condition of Draft Approval This comment has been acknowledged. No further action required at this time.
<u>Corridor Planning</u>		
Regional Road Dedication A 15.24m x 15.24m daylight triangle will be required at the intersection of Maple Grove Road and Speedsville Road. The daylight triangle should be measured after the road widening along Speedville Road. An Ontario Land Surveyor (OLS) will need to determine the exact road widening. The land must be dedicated to the Region of Waterloo for road allowance purposes and must be dedicated without cost and free of encumbrance. All land dedications should be identified on the final registration plan.	TJCG / Surveyor	The draft plan has been revised to show the daylight triangle being in addition to the widening along Speedsville Road. An additional widening is understood to be potentially required through the Maple Grove EA process which is now moving towards detailed design stage. Once the requirements from the Maple Grove EA widening are known, the drawing can be further updated or the widening can be dedicated through expropriation at a later date if necessary.
Access Permit/TIS/Access Regulation Regional staff have reviewed the report entitled "River Mill Development Corporation, Mixed Use Development, Transportation Impact Study" (Paradigm Transportation Solutions Limited, dated July 2020) and the following comments were provided to the traffic consultant		This comment has been acknowledged. No further action required at this time.

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Region of Waterloo: Community Planning		
Comments	**Consultant**	**Response**
There were discrepancies in the volumes used for the traffic signal warrants compared to those presented in Figure 4.3 (2025 Total Volumes) and Figure 4.5 (2030 Total Volumes). Upon re-running the signal warrant analysis using the volumes shown in Figures 4.3 and 4.5, the following were found: • Signals are warranted at Speedsville Road and Heroux Devtek Drive / Street A in 2025. • Signals are warranted at Speedsville Road and Equestrian Way, but not until 2030. • Signals are not warranted at Speedsville Road and Street B in either future horizon scenario, and therefore, staff advise that the intersection should operate under un-signalized control.	Paradigm	Arrangements to have an ICS report prepared are under way.
Staff concur with the recommendation to proceed to an Intersection Control Study (ICS) for Speedsville Road and Heroux Devtek Drive and Speedsville Road and Equestrian Way based on the 20-year life-cycle cost analysis. **Prior to draft plan approval,** the Owner/Developer must prepare Intersection Control Studies for the intersections of Speedsville Road at Heroux Devtek Drive/Street A and Speedsville Road at Equestrian Way to the satisfaction of the Region and the City of Cambridge. Speedsville Road is currently under the City's jurisdiction, but is planned to be transferred to the Region in the future. The timing of this road transfer is unknown at this time.	Paradigm	Arrangements to have an ICS report prepared are under way.
Transit Planning Grand River Transit staff have identified two future stops: • a new eastbound stop on Maple Grove Road at Speedsville Road, at the corner of Block 28 Open Space; and, • a new northbound stop on Speedsville Road at Street A, at the corner of Block 8.	MTE / TJGC	This comment has been acknowledged. No further action required at this time. Transit Stops will be shown on drawings at detailed design stage.
The Owner/Developer will be required to fund transit stop infrastructure or provide funds-in-lieu as condition for approval. Timing will be determined by implementation of Maple Grove Road and Speedsville road improvements. Stop M1 is planned for iXpress service, which requires a larger sized landing pad, shelter pad, and shelter compared to local stops. The total current cost for the two transit stops infrastructure is $43,400.	**Owners**	Becomes a condition of the subdivision agreement. This comment has been acknowledged. No further action required at this time.

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Region of Waterloo: Community Planning		
Comments	**Consultant**	**Response**
Regional Airport The proposed development is located within six kilometres of the Region of Waterloo International Airport. The use of construction cranes may require the Owner/Developer 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. If any proposed buildings/structures exceed 100 feet Above Ground Level, then the applicant must advise NAV Canada https://www.navcanada.ca/en/products-and-services/Pages/land-use-program.aspx	**Owners / TJCG**	Becomes a condition of the subdivision agreement. This comment has been acknowledged. No further action required at this time.
Noise Study – Transportation Noise Corridor Planning staff have reviewed the report entitled "Noise Feasibility Study, River Mill Phases 4 & 5 Residential Development, Speedsville Road & Maple Grove Road, Cambridge, Ontario" (HGC Engineering Limited, July 27, 2020) and provide the following comments regarding transportation noise.		This comment has been acknowledged. No further action required at this time.
The report indicates that the primary noise source is road traffic from Regional Road #38 (Maple Grove Road), Speedsville Road and Highway 401. The report indicates that a detailed noise study will be required for all blocks adjacent to Speedsville Road and Maple Grove Road in both plans of subdivision when building siting and grading information is available to investigate the potential environmental noise impacts on buildings and the acoustic requirements including acoustic barrier, ventilation and building constructions. The report concludes that the proposed development is feasible but mitigation will be required such as noise barriers for dwelling units along Speedsville Road and Maple Grove Road, special building components, provision for air and air conditioning and noise warning clauses. Further, outdoor living areas for units closest to these roads should be located on the shielded side of the buildings, away from the roadways.		This comment has been acknowledged. No further action required at this time.

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Comments	**Consultant**	**Response**
The report notes that for units in all remaining blocks, specific ventilation systems are not required and the requirements of the Ontario Building Code (OBC) will provide adequate sound insulation. It also notes that the sound levels at the Outdoor Living Areas (OLAs) for these units will not exceed the recommended levels and no outdoor noise control measures will be required.		This comment has been acknowledged. No further action required at this time.
Regional staff notes that the above noise study is based on a concept plan and does not reflect the blocks numbers identified on the proposed plans. Since the proposed Phase 4 plan will need to be updated to identify a school block as per the WCDSB's request and to incorporate other requested revisions by various agencies, the noise feasibility study will need to be updated based on the future revised plan. **The revised noise feasibility study must be updated to reflect the block numbers in the proposed plans and submitted to the Region prior to draft plan approval of both plans of subdivision.**	HGC / TJCG	The noise study has been updated to reflect the most recent design.
Noise Study – Stationary Noise The Arriscraft facility located approximately 300 metres south of the proposed Phase 4 plan is a Class III industrial facility under the Ministry of Environment, Conservation and Parks Guideline D-6 – Compatibility Between Industrial Facilities and Sensitive Land Uses. The above noted noise study assessed noise from this facility on the proposed development. The study noted that there are existing berms located to the north and east of the site. In addition, traffic noise from Speedsville Road and Maple Grove Road were the dominant noise sources and therefore, sound from the Arriscraft facility was not observed while on site during the daytime and nighttime noise measurements.		This comment has been acknowledged. No further action required at this time.
The study also reviewed possible noise from the adjacent Boxwood Business Campus and noted that significant noise impacts from the light industrial facilities and offices is not expected at the proposed development as sounds from these facilities were generally not audible.		This comment has been acknowledged. No further action required at this time.

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Region of Waterloo: Community Planning		
Comments	**Consultant**	**Response**
Finally, the noise study recommends a Type E warning clause to inform future residents of the nearby industrial facilities. Prior to final approval of the Phase 4 plan, the Owner/Developer will be required to enter into a Subdivision Agreement with the City of Cambridge to include the following warning clause in all offers of Purchase and Sale and/or Lease/Rental Agreements: *"Purchasers/tenants are advised that due to the proximity of existing industrial facilities, noise from these facilities may at times be audible."*	TJCG / Lawyer	Becomes a condition of the subdivision agreement.
Cultural Heritage Regional staff received the "Partial Stage 1 and 2 Archaeological Assessment for Proposed River Mill Development" (Detritus Consulting Ltd., October 1, 2020) for the parcel at 800 Briardean Road. **Prior to draft plan approval, the Ministry's Acknowledgement letter for this Assessment must be submitted to the satisfaction of the Region.** Regional staff may have comments or recommendations related to this Assessment following the receipt of the Ministry's Acknowledgement letter.	TJCG	Ministry's Acknowledgement letter has been received. No further study required.
Record of Site Condition The Planning Justification Report for the Phase 4 plan identified the small parcel at 1285 Speedsville Road as a former auto repair shop and that a Record of Site Condition is required for this parcel. A Phase 1 and 2 Environmental Site Assessments (ESAs) were completed and the RSC process is underway.	Ian / Jeff	RSC for 1285 Speedsville Road has been registered. The documents have been included in this submission. Environmental Site Assessments and RSCs have been completed as necessary for all lands within the development.
Regional staff cannot confirm whether this parcel has any contamination as the Phase 1 and 2 ESAs for this parcel were not submitted to the Region. The Owner/Developer is required to advise of any known contamination on this parcel due to the former auto repair use based on the completed ESA's. Given the former use on this parcel, in accordance with the Region of Waterloo's Implementation Guideline for the Review of Development Applications On or Adjacent to Known and Potentially Contaminated Sites, 1285 Speedsville Road has a high potential for contamination. A Record of Site Condition (RSC) will be required for this parcel and an acknowledgement letter from the Ministry of the Environment, Conservation and Parks.	Ian / Jeff	RSC for 1285 Speedsville Road has been registered. The documents have been included in this submission. Environmental Site Assessments and RSCs have been completed as necessary for all lands within the development.

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Comments	**Consultant**	**Response**
The RSC and the Ministry's Acknowledgement letter will be required as a condition of draft plan approval of the Phase 4 plan, or through the use of a Holding provision in the implementing Zoning By-law if permitted in the City of Cambridge Official Plan prohibiting the proposed use until submission of an RSC.	**Ian / Jeff / TJCG**	RSC for 1285 Speedsville Road has been registered. The documents have been included in this submission. Environmental Site Assessments and RSCs have been completed as necessary for all lands within the development. Ministry's Acknowledgement letter has been received. No further study required.
Next Steps The Owner/Developer should be advised that receipt of these post circulation comments does not constitute a draft or final approval of this application. Prior to draft approval by the Region, the Owner/Developer must address the above noted agency and Regional comments, as well as the City of Cambridge comments. Further, the City of Cambridge must provide a recommendation in support of draft plan approval for each plan, including the City's conditions of draft approval.	TJCG	This comment has been acknowledged. No further action required at this time.
Further, prior to draft approval, the Owner/Developer must submit to the Region 5 copies of each plan to be draft approved. The plan must be singed by the Owner and Surveyor. Once each plan of subdivision is draft approved, the draft approval will take effect 21 days after the day the notice of decision is issued, provided no appeals are received in accordance with Section 51(39) of the Planning Act.	TJCG	This comment has been acknowledged. No further action required at this time.

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