



Bradford Highland Golf Course Comment Response Matrix
23 Brownlee Drive, 2820, 2824, and 2848 Line 5
File No.: D14-23-15 & D12-23-11
Zoning By-law Amendment & Draft Plan of Subdivision Comment Matrix

Last Updated: November 1, 2024

Bradford West Gwillimbury	LSRCA	External Agencies	Public Meeting
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AODA Comments – Town of Bradford West Gwillimbury Valerie Vicary, Committee Coordinator & Accessibility Coordinator <i>February 20th, 2024</i>			
1.	<p>As the circulated site plan for D12-23-11 does not include accessible parking spaces or greenspace/parks, please ensure that the applicant adheres to the following regulations and guidelines to conform to current AODA standards.</p> <ul style="list-style-type: none">• <i>Integrated Accessibility Standards O. Reg. 191/11 (IASR)</i> under the <i>Accessibility for Ontarians with Disabilities Act, 2005 (AODA)</i>. Part IV.1, s.80.1-80.44, <i>Design of Public Spaces Standards</i>;• Guidelines set forth by the <i>Illustrated Technical Guide to the Accessibility Standards for the Design of Public Spaces</i>, which was created by the <i>Global Alliance on Accessible Technologies and Environments (GAATES)</i> and adopted by the Town of BWG in 2017 to ensure continued compliance; and• Town of BWG’s By-law 2019-22 – regulating off-street accessible parking. <p>As these are preliminary drawings only, please circulate the formal site plan proposal once available for additional AODA comments.</p>	Owner	Acknowledged, details to be provided through detail design drawings.
Corporate Services – Town of Bradford West Gwillimbury Kesha Daley-Livingston, Law Clerk <i>March 19th, 2024</i>			
Enforcement			
2.	<p>Section 9.0 Parking considerations of the Traffic Impact Study identifies that approximately .57 on street parking spaces will be provided per unit. This is a high level assessment so it is difficult for me to comment on based on this assessment alone. Any on-street parking considerations shall comply with the Towns Traffic By-Law</p>	BA Group	<p>Given that driveway locations are typically designed during the detailed design stage process (i.e. Site Plan Approval), no driveways have been currently illustrated in the concept development plan. However, high level estimates have been made based on the Town of Bradford West Gwillimbury Engineering Design Standards for the purposes of this study.</p> <p>Based on the estimated on-street parking supply of 445 spaces, the site can achieve approximately 0.46 spaces per unit on-street. The parking allocation plan (PP-01) is provided in Appendix H of the transportation letter. Final supply is subject to further details related to coordination with the project team during the detail design process.</p>
Accessible Parking Spaces			
3.	<p>All accessible parking spaces shall be indicated with signage and pavement markings to comply with the Accessible Parking By-law - 2019-22.</p>	BA Group	<p>The proposed development programme consists of 962 residential units, including single-detached homes, semi-detached homes, and townhouses. The Zoning By-law indicates that accessible parking is only required for developments consisting of apartment buildings, long-term care facility, nursing home, retirement home and any non-residential uses. Given that the development is not proposing any land uses mentioned above, no accessible parking is required to be provided for the proposed development.</p>
Fire Routes			
4.	<p>All designated Fire Routes are required to be signed and spaced at the discretion of the Fire Chief.</p>	BA Group	Noted
Legal, Risk Management, and Procurement			

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5.	Legal must be notified if any lands are to be conveyed to the Town.	Owner	Acknowledged
6.	To note that there is a sanitary easement as in RO153740 on Plan 51R-12433 or as Part 2 on 51R-21792.	RPE/Owner	Acknowledged, the easement is located within the greenbelt area and is to be maintained.
Finance – Town of Bradford West Gwillimbury Ian Goodfellow, Director of Finance <i>February 13th, 2024</i>			
7.	Taxes on the above-noted properties have been paid to date and there are no outstanding invoices. Therefore, there are no objections at this time regarding the Application for Zoning By-law Amendment and Draft Plan of Subdivision.	Owner	Acknowledged
Development Engineering – Town of Bradford West Gwillimbury Tom Wheeler, Senior Engineering Technologist & Gavin Watson, Manager <i>July 19th, 2024</i>			
General			
8.	A number of the reports are outdated and will be required to be updated with current data and information. All reports shall be revisited to ensure that they reflect current and valid data	Various	All the reports have been updated to reflect the latest development proposal.
9.	All reports should be coordinated to ensure that they consistent. Duplicate reports may exists with variations in titles. All reports shall be reviewed to eliminate duplication.	Various	All the reports have been coordinated for the latest development proposal.
10.	It should be noted that proposed servicing drawings have not been included with this submission and are required. The Town’s DCM should be reviewed for required materials to be provided in support of the application types and appropriate materials be provided. Note: complete drawing sets are to be provided as separate digital files in addition to those included within the report appendices.	SCS	Addressed, drawings have been included in the submission within the report and as separate files.
11.	A noise impact study has not been provided and is required.	Jade	A Noise Impact Study has been provided with this resubmission.
12.	Has any consideration been given to creating a buffer between the existing estate residential lots and the proposed low to medium density residential lots?	Owner/MGP	The Draft Plan has been revised to include walkways to act as a landscape buffer between the existing and proposed lots.
Draft Plan of Subdivision			
13.	A significant portion of the proposed stormwater management pond block appears to be proposed well within the greenbelt limit (refer to relined drawing). Further clarification and discussion on this matter is required to determine if this is permissible	MGP	The stormwater management pond location has been revised to remove it out of the Greenbelt lands.
14.	The revised plan does not contemplate the connectivity of Brownlee Drive to the development. While we acknowledge this is a result of comments from the public, further discussion is required to determine if this is in the best interest of the community as a whole and a functioning road pattern. The creation of emergency access points is not a desirable solution.	MGP/Owner/B A Group	The revised Draft Plan now provides a couple of connection points onto Brownlee Drive to include to increase the connectivity between the existing and future community.
15.	A 10 m x 10 m daylight triangle is proposed at the Street ‘A’ connection to both Line 6 and Line 5. As street A will be a collector roadway, and Line 6 and 5 are both major arterial roadways, a 15 m x 15 m daylight triangle will be required.	BA Group/MGP	The Draft Plan has been revised to accommodate 15x15 daylight triangles on Line 5 and 6.
Traffic Impact Study			
16.	Previous Comment: A Traffic Impact Study is required to assess the proposed development’s traffic impact on the surrounding road network, including the site accesses at Line 5, Line 6 and adjacent developments, nearby	BA Group	Buildout and 5-year post-buildout horizon years of 2026 and 2031 were analyzed as part of the initial submission in 2021. In the September 2023

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	<p>signalized and unsignalized intersections and major intersections in all directions along those roads, and provide commentary regarding any potential road network improvements required from this proposal.</p> <p>Town of BWG requires the report to assess the existing traffic conditions within the said road network and assess the future conditions applying a minimum of 2% compound growth rate to a future horizon of 10 years after anticipated completion date of the development. Furthermore, this study must assess and comment on safety of all proposed accesses.</p> <p>The Town is in the process of finalizing a new Transportation Master Plan and through consultation with the Town your findings will need to be introduced into the model for review.</p> <p>Updated Comment: While a Transportation Impact Study (TIS) has been provided we are of the opinion that the 2036 horizon date analyzed is not reflective of a 10 year post-project completion date.</p>		<p>submission, which was an update of the initial 2021 submission, an additional 10-year post-buildout horizon year of 2036 was analyzed on the basis that the 2026 and 2031 horizon years within the initial 2021 submission were accepted by the Town of Bradford West Gwillimbury.</p> <p>For the analysis updated as part of this submission, the 10-year post-buildout horizon year of 2036 was maintained based on parameters accepted as part of the two prior submissions. It should be noted that as part of this analysis, 15 years of background growth have been applied to existing traffic levels, including 10 years of growth after the assumed buildout year of 2026. This results in traffic levels that would be reflective of a 10 year post-buildout scenario irrespective of the actual completion date of the development.</p>
17.	<p>The report is to be updated to include the signature / seal of a Licensed Professional Engineer (P.Eng.) in the province of Ontario.</p>	BA Group	<p>A Professional Engineer (P.Eng.) stamp is not required or permitted for a response to comments letter or TIS report as outlined in the PEO Act and <i>Use of the Professional Engineer's Seal</i>, dated March 2022. As such, no P.Eng. stamp will be provided for this updated letter.</p>
18.	<p>Figure 7 of the report indicates stop controlled intersections at Street A / Line 5 and Street A / Line 6 intersections. While a signal warrant analysis has concluded a signal is not warranted at these intersections, we question whether one is actually required at the Street A / Line 6 intersection based on the v/c ratios and LOS's. Please revisit this matter.</p>	BA Group	<p>Updated traffic volume projections and signal warrant analyses have been conducted as part of this submission due to the evolution of the development plan. As discussed in Section 6.0 of the transportation letter, traffic signal warrant analyses have been completed in accordance with the Ontario Traffic Manual – Book 12 methodology, which showed that traffic signals are not warranted at the intersections of Line 5 / Street A and Line 6 / Street A.</p> <p>At the intersection of Line 6 / Street A specifically, delays for each movement are no worse than 20 seconds on average, at LOS C, for the northbound left turn movement. This corresponds with acceptable operation under HCM methodology and is typical of two-way stop controlled intersections intersecting with arterial roads. It should be noted that the increase in delays is primarily due to significant background traffic growth along Line 6.</p>
19.	<p>Figure 7 indicates Street A as terminating north of Line 5. Please clarify if this is a drafting error as we understand Street A is to connect to Line 5.</p>	BA Group	<p>Street A intersects with Line 5 as shown in Figure 2 of the transportation letter.</p>
20.	<p>Section 4.3 discusses TDM measures for the proposed development, however, the Town is of the opinion the TDM measures discussed are inadequate for the proposed development type. Further consideration should be given to additional TDM measures that promote traffic calming. Items, including but not limited to, traffic bollards, roundabouts, raised intersections, parking bump outs, etc. should be considered. Staff would be open to discussing further options and ideas ahead of major revisions.</p>	BA Group	<p>Traffic calming measures are being proposed throughout the proposed development, particularly along the proposed Street A corridor to reduce vehicle speeds. These traffic calming measures include raised mid-block pedestrian crossings, raised intersections crossing where high pedestrian demand is anticipated, speed humps, all-way stop controlled intersections, and curb extensions / bump-outs to accommodate on-street lay-by parking and reduce the width of the road. A proposed traffic calming plan is illustrated in Figure 1 and provided in Appendix B of the transportation letter.</p>

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21.	Section 5.4.1 indicates that historical traffic count data was not available at the intersections in the vicinity of the site and that the Town's OP was reviewed in order to calculate a suitable growth rate. The Town typically considers a growth rate of 2.5 % and would ask that the report be updated to be reflective of this growth rate.	BA Group	<p>In the April 22, 2022 comments received from the Town of Bradford West Gwillimbury, a minimum of 2% compound growth rate to a future horizon of 10 years after the anticipated completion date of the development was requested. Consistent with the September 2023 Report, corridor growth was applied to major corridors (i.e. Line 6, 10 Sideroad, 5th Line and Simcoe Road). The Town of Bradford West Gwillimbury's Official Plan was reviewed to determine a suitable corridor growth rate.</p> <p>The adopted corridor growth includes 10 years of annualized employment growth at 4%, and 15 years of annualized population growth at 2%. This corresponds with an increase in corridor traffic of approximately 83% by the 2036 horizon year. An annualized growth rate of 2.5% over 15 years would result in an increase in corridor traffic of approximately 45% by the 2036 horizon year. As such, the adopted corridor growth is more conservative than the 2.5% growth typically used by the Town.</p>
22.	Figure 12B fails to include local roadways. Please update the drawing to reflect the current street network layout indicated on the latest version of the draft plan or, at a minimum, provide additional details to demonstrate internal trip generation breakdown (i.e. indicate how the provided internal trip counts were established based on local roadway trip generation).	BA Group	<p>Traffic analysis was conducted at 6 key internal intersections, which correspond with intersections that are expected to receive the most traffic demand. These are intersections that provide access to the various site driveways. It is anticipated that all other local internal intersections will operate at levels better than the 6 intersections analyzed as part of this study.</p> <p>The site was split into various internal zones. Traffic from each zone was assigned via the 6 analyzed intersections within the site to each external site access. The magnitude of traffic from each internal zone to each site access was based on the number of units within each zone as well as the amount of traffic projected to use each external access in both peak hours.</p>
23.	Table 12 indicates a LOS of E under the future total 2031 columns. This will require further review between the parties.	BA Group	<p>Updated traffic volume projections and traffic operations analysis have been conducted as part of this submission due to the evolution of the development plan. As shown in Table 9 of the transportation letter, the individual movements of Line 6 / Simcoe Road operate at LOS C or better under all future scenarios after signal optimization.</p> <p>It should be noted that LOS is not the industry standard for evaluating the performance of signalized intersections, nor is it an effective indication of how well an intersection operates. Further details can be found in Section 10.2 of the transportation letter.</p>
24.	Table 15 indicates a significant drop in LOS on the EBL movement from the future background to future total columns (A to E). This will require further review between the parties.	BA Group	<p>Updated traffic volume projections and traffic operations analysis have been conducted as part of this submission due to the evolution of the development plan. As shown in Table 10 of the transportation letter, the eastbound left turn movement at Line 6 / Melbourne Drive & Inverness Way operates acceptably at LOS C and with a v/c ratio of 0.77 under future total conditions in the 2036 horizon year.</p>

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			It should be noted that LOS is not the industry standard for evaluating the performance of signalized intersections, nor is it an effective indication of how well an intersection operates. Further details can be found in Section 10.2 of the transportation letter.
25.	Cycle length under the 2036 scenario for all tables has been increased from 60 seconds to 80 seconds. This will require further review between the parties.	BA Group	Noted.
26.	Tables 21 and 22 have a few reported LOS's of D or worse, This will require further review between the parties.	BA Group	Noted. For unsignalized intersections, a LOS D corresponds with delays of 25 to 35 seconds while LOS E corresponds to delays of 35 to 50 seconds. This is considered an acceptable condition according to HCM 2000 and is common for unsignalized intersections to experience delays in these ranges.
27.	Table 26 indicates LOS's of C or worse for the NBLR movement under all horizon dates analyzed for the Street A / Line 6 intersection. Given that this is proposed as a stop controlled intersection, additional consideration should be given to signaling this intersection. While we acknowledge the report includes a signal warrant analysis (Table 28) for this intersection we would like to discuss this further with the Consultant.	BA Group	<p>Updated traffic volume projections and signal warrant analyses have been conducted as part of this submission due to the evolution of the development plan. As discussed in Section 6.0 of the transportation letter, traffic signal warrant analyses have been completed in accordance with the Ontario Traffic Manual – Book 12 methodology, which showed that traffic signals are not warranted at the intersections of Line 5 / Street A and Line 6 / Street A.</p> <p>At the intersection of Line 6 / Street A specifically, delays for each movement are no worse than 20.3 seconds on average, at LOS C, for the northbound left turn movement. This corresponds with acceptable operation under HCM methodology and is typical of two-way stop controlled intersections intersecting with arterial roads. It should be noted that the increase in delays is primarily due to significant background traffic growth along Line 6.</p>
28.	Please revisit the reported LOS for the EBL movement reported under the future total 2036 column in table 13. Given the v/c ratios would this LOS not be E? Please clarify.	BA Group	Under HCM 2000 methodology, volume-to-capacity ratios are reflective of the maximum traffic volume each movement in an intersection is capable of supporting, and how close the actual traffic volume is to reaching that limit. Meanwhile, LOS is determined by average delays, which may not necessarily correlate with volume-to-capacity.
29.	Table 29 concludes that no all way stop controls are warranted at local road intersections with Street A. While a list of these intersections have all way stops proposed in some future scenario, and to address our previous TDM comment, we question if consideration has been given to roundabouts at Street B / Street A intersection. To further address our previous TDM comment, this item could also be considered at other notable internal intersections.	BA Group	<p>BA Group has reviewed the potential of providing a traffic roundabout at the proposed Street B / Street A intersection within the site. Based on our review, it was determined that a roundabout could not be accommodated due to the anticipated residential lot patterns at the proposed intersection. Given that it is not desirable to have direct driveway access to / from a roundabout intersection within 10 metres, a roundabout cannot be accommodated at the proposed Street B / Street A intersection. Providing a roundabout at the proposed intersection would result in driveways accessing the roundabout directly which is an unfavourable transportation condition in terms of safety and operations.</p> <p>The proposed Street B / Street A intersection is located near the potential proposed elementary school and park blocks. A roundabout could potentially</p>

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			<p>create some challenges for pedestrians to navigate safely through the intersection. Given that roundabouts typically require much larger area than a conventional intersection, pedestrians will have to loop around the roundabout and increase their walking distance to cross the intersection, making it less efficient and accessible.</p> <p>Therefore, it is recommended that the proposed Street B / Street A intersection operates as a traditional all-way stop-controlled intersection.</p>
30.	The provided pedestrian circulation plan only indicates pedestrian circulation on streets with proposed sidewalks and does not include circulation through any stormwater management, park, or amenity space blocks. The plan should be revisited to include pedestrian circulation, via trail networks, through green space blocks.	BA Group	An updated pedestrian circulation plan is provided in Appendix G of the transportation letter.
31.	Section 9.0 indicates that driveway locations were not available on the conceptual plan at the time the report was prepared and high level estimates were made. As part of draft plan approval we would ask that proposed driveway locations be established and demonstration that on street parking requirements can be met with the proposed driveway locations.	BA Group	<p>Given that driveway locations are typically designed during the detailed design stage process (i.e. Site Plan Approval), no driveways have been currently illustrated in the concept development plan. However, high level estimates have been made based on the Town of Bradford West Gwillimbury Engineering Design Standards for the purposes of this study.</p> <p>Based on the estimated on-street parking supply of 445 spaces, the site can achieve approximately 0.46 spaces per unit on-street. The parking allocation plan (PP-01) is provided in Appendix H of the transportation letter. Final supply is subject to further details related to coordination with the project team during the detail design process.</p>
32.	In section 10.0 formula $AADT = (AM\ Peak + PM\ Peak\ hour\ traffic) / 2 / 9\%$ is used to calculate the estimated traffic range at the development boundary intersections. While the report does indicate that this is an accepted practice, we ask for a further explanation be included as to why this was chosen.	BA Group	<p>he AADT formula utilized in this study is based on HCM methodology. The AM and PM peak hour traffic were averaged to determine a directional design-hour volume for the purposes of calculating AADT. The directional design-hour volume is divided by the K-factor, which within HCM 2000 is defined as the percentage of average daily traffic that is observed in the directional design-hour volume.</p> <p>HCM 2000 states, “The proportion of total daily traffic that occurs in the peak hour is defined by the K-factor. For many rural and urban highways, this factor falls between 0.09 and 0.10.” Thus, a K-factor of 9% was selected for the purposes of this analysis.</p>
33.	Under the “Transit Route Pattern” and “Bus Stop Pedestrian Pad” headings it appears accommodations are made for bus stop locations. Further details of a proposed bus route through the development will require to be established as part of draft plan approval.	BA Group	It is understood that no bus route is proposed at this time. While the proposed collector routes have been designed to accommodate a future bus route, specific infrastructure including bus stop and pad locations will be determined pending the creation of a bus service in the Town.
34.	The provided on street parking plan considers parking dimensions of 6.0 m, 6.2 m, and 6.7 m, however, the Towns requires parking spaces to be 6.0 m for single and end proposed spaces and 7.2 m for middle spaces. Please update the drawing accordingly and demonstrate that the on street parking requirement can still be met.	BA Group	It should be noted that the Town does not have any engineering standards for the parallel parking spaces along curbsides between private driveways. BA Group has assumed the length of parking spaces to be minimum 6.0 metres for single and end proposed spaces and minimum 7.2 metres for middle spaces.

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			Based on the estimated on-street parking supply of 445 spaces, the site can achieve approximately 0.46 spaces per unit on-street. The parking allocation plan (PP-01) is provided in Appendix H of the transportation letter. Final supply is subject to further details related to coordination with the project team during the detail design process.
35.	Table 7 considers surrounding area background developments but does not appear to include the BCH major development to the immediate east. Please clarify.	BA Group	<p>The majority of the BCH development to the east of the subject site was constructed and occupied prior to the date of the existing turning movement counts collected in February 2021. As such, traffic generated by the development would already be accounted for under existing traffic conditions.</p> <p>It is understood that an application has been submitted for Block 403 of the BCH development which considers a total of 15 new residential units. Given the relatively small scale of the new development, specific traffic allowances were not made as part of the background developments considered in the analysis. Instead, allowances were made for this development as part of the 2% annual population growth compounded over 15 years along Line 6.</p>
Hydrogeological Investigation			
36.	<p>At the time of report preparation sufficient design information was unavailable for the engineer preparing the report to make any hydrogeological recommendations.</p> <p>Based on the information available, the Town is concerned regarding the reported artesian conditions and areas of hydrostatic uplift present within Block 510.</p> <p>In order for Development engineering to complete a more comprehensive review of this report we would require additional design information and details, especially for the proposed stormwater management pond in Block 510.</p>	WSP	Block 510 is no longer a proposed SWM Pond as per the latest design drawings; therefore, this review is no longer required.
37.	It is noted that a portion of the subject property is located within a significant groundwater recharge area. Additional information is to be provided on potential impacts associated with this matter and / or any potentially required remediation strategies.	WSP	Potential impacts and remediation measurements related to groundwater recharge are discussed in the stand-alone water balance report (WSP, 2024).
38.	There are a significant number of existing active wells in the surrounding area being used to service residential properties. Given the number of currently active wells, further design details are to be provided to demonstrate that negative impacts to the existing wells will not occur due to the development proposal. Should negative impacts be identified, mitigation strategies should be proposed for further consideration.	WSP	An evaluation of potential impacts to private water users in the vicinity of the Site will be conducted as part of the on-going construction dewatering assessment. In the event that the potential for impacts is identified, a monitoring and mitigation program will be developed.
39.	A number of boreholes (i.e. BH2, BH11, and BH22-03) have very shallow groundwater elevations reported. Also, BH22-09 reports confined conditions, with significant variance in reported groundwater elevations, and BH16 & BH22-03 are noted with artesian conditions. Additional details are to be provided to demonstrate any potential impacts and / or remediation requirements associated with these findings.	WSP	The interaction and impact between the proposed design plans and the Site groundwater conditions is currently being investigated.
40.	While we note a full year of monitoring has been provided, we do not believe readings have been provided capturing the spring freshet. Additional monitoring data is to be recorded and provided for consideration.	WSP	The water level readings provided to have included continuous water level monitoring throughout one calendar year at four monitoring wells, as well as one to two manual readings gathered at each well during a spring month

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			(March, April, May). The groundwater hydrographs exhibited a pattern of highest water levels in the spring, and lower water levels throughout the summer. In our opinion, the available water level data characterizes the full range of seasonal water level changes across the Site. Can clarification be provided as to what data would constitute measurement of the “spring freshet”?
Geotechnical Investigation			
41.	At the time of report preparation sufficient design information was unavailable for the engineer preparing the report to make geotechnical recommendations. In order for Development Engineering to complete a more comprehensive review we would require additional design information and details.	WSP	Additional geotechnical review will be completed at the detailed design stage.
42.	Additional information is to be provided within Block 510 to allow the Geotechnical Consultant to review potential basal instability / aquifer depressurization during both construction and long-term maintenance activities.	WSP	Block 510 is no longer a proposed SWM Pond as per the latest design drawings; therefore, this review is no longer required.
Environmental Impact Study			
43.	The report is to be updated to include the seal of the appropriate professional licensed to practice, in the subject report area, in the Province of Ontario.	Beacon	The EIS is signed by technical experts in their respective disciplines, they are no ‘professional licences’ or ‘seals’ associated with ecology.
44.	The report should be updated to assess whether the DFO fisheries timing window would apply to this application.	Beacon	Noted. This information has been added to the EIS (Beacon 2024). Fisheries timing windows imposed by DFO are determined by MNRF. It is likely that works would be restricted in this warmwater system from April 1 to June 30; however, given the lack of direct fish habitat, the timing windows for the proposed works will be determined with DFO and MNRF at the time of the application
Preliminary External Servicing Investigation and Financial Review			
45.	<p>Previous Comment: This report investigates the Town’s service capacity for water and wastewater services to determine available residual capacity for growth allocation, as well as planned upgrades and future expansions for future growth. Although we agree with the approach, we are concerned that too much time has lapsed (5 years) since the report was prepared; the Town population has grown, some of the projects predicted by the report have been completed, and new projects have been foreseen or approved within the Town Capital Budget. As a result, an update to the report is required to re-assess the existing and future population, as well as available and planned capacity within Town services.</p> <p>Upon receipt of the required Hydrogeological Assessment and Geotechnical Reports, this report should be updated to further discuss the developments proposed stromwater management features and anticipated impacts on downstream networks.</p> <p>Updated Comment: While it is noted that several additional reports have been provided as part of this submission, we are still of the opinion that this comment has not been addressed.</p> <p>At this time it does not appear that the newly provided SWM and FSR reports have adequately demonstrated the proposed developments servicing requirements or existing servicing availability. Additionally, the provided</p>	SCS	<p>The new Functional Servicing & Stormwater Management Report (FSSR) prepared by SCS Consulting Group Ltd. now includes downstream capacity assessments (storm and sanitary) to confirm if the existing municipal infrastructure is capable of supporting the proposed development. Please refer to the report text for a summary of the assessment and the existing sanitary and storm design sheets/drainage plans in Appendix E and J of the FSSR.</p> <p>See responses below for specific responses to the downstream capacity assessments.</p>

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	<p>SWM and FSR reports do not appear to have accounted for the newly provided hydro geotechnical and geotechnical reports, as requested.</p> <p>The applicant should be required to clearly indicate the proposed developments servicing demands (at a minimum) and clearly demonstrate that the proposed development can be accommodated by the existing surrounding area municipal infrastructure. All calculations and methodology used to design the sewer systems should be provided and justified. Should existing municipal infrastructure upgrades be required, these upgrades should be assessed and presented to the Town for further consideration.</p>		
Servicing Brief			
46.	<p>Previous Comment: While we acknowledge proposed locations for sanitary and water connections to existing services, and proposed pipe sizing at the connection points, have been provided, sanitary and water demands for the proposed development have not been provided. Additionally, assessment of the required stormwater management features and details of the proposed stormwater management ponds have not been provided. This report should be updated in conjunction with the Preliminary External Servicing Investigation and Financial Review update to better assess the proposed developments servicing requirements against the existing servicing availability.</p> <p>Updated Comment: Based on the newly provided materials we are still not satisfied that this comment has been addressed.</p>	SCS	<p>Section 5.0 and 6.0 of the FSSR for the assessment of the stormwater management features and details of the proposed stormwater management pond.</p> <p>Section 7.0 of the FSSR details sanitary flows from the proposed development and an assessment of the downstream sewer system.</p> <p>Section 8.0 of the FSSR outlines the watermain demands from the proposed development.</p>
Functional Servicing Report			
47.	Section 3.0 of the report speaks to an exhaustive list of reports that are to be read in conjunction with the FSR. We would ask that all relevant information being referenced in all reports be provided in the appendices. It should be noted that it is the Applicants responsibility to demonstrate the functionality of their proposed development including providing appropriate references and supporting materials in reports for Town consideration.	SCS	Acknowledged, the report text has been updated to include relevant materials in the respective sections.
48.	Section 5.0 of the report references a Master Environmental Servicing Report (MESP) for the design criteria selected for the watermain design for this development. The Towns DCM is typically used as the basis for design, not previously prepared reports. Please provide justification as to why the alternate criteria was selected and demonstrate the development meets the design criteria selected (either from the report or the Town’s DCM).	SCS	The Watermain Distribution Model prepared by MES uses the design criteria from the Town’s DCM. A copy of this report is included in Appendix K of FSSR.
49.	While the “ <i>County of Simcoe Water and Wastewater Service Delivery Review</i> ” report, as referenced in Section 5.0, indicates spare capacity exists in the Towns watermain distribution system, the report clearly indicates that this is based on “ <i>approximated current operating conditions and populations.</i> ” Having said this we do not believe these findings to be substantial evidence of adequate available water supply for the proposed development. The applicant shall still be required to fully demonstrate adequate water supply is available in the existing water distribution system to accommodate the developments water demands.	SCS	<p>Please reference Section 8.1 and 8.2 of the FSSR for a summary of the water servicing details and planned upgrades to the support additional water supply to the Town. It is our understanding the Town is currently completing a Master Servicing Study to assess the existing water infrastructure to determine residual capacity and planned upgrades to the system.</p> <p>Confirmation of servicing allocation will be granted through the planning approvals for the proposed development.</p>
50.	Section 6.0 discusses upgrades / modifications being required to the Line 6 sanitary pumping station in order to support the development as proposed. The report should be updated to further discuss the full extent of the required upgrades and include an assessment of the sanitary infrastructure the development is relying on in (i.e. existing downstream sewer system and existing sanitary pumping station).	SCS	The analysis of the existing downstream sanitary system includes the flows from the proposed development. It was determined that no upgrades to the Line 6 Sanitary Pumping Station are required as the total peak flow is 97 L/s.

#	Comment	Response By	Response
			The Green Valley SPS Design Brief notes the station, with both pumps running, will have a firm capacity of 102 L/s.
51.	<p>While the “County of Simcoe Water and Wastewater Service Delivery Review” report, as referenced in Section 6.0, indicates that “<i>spare capacity exists to accommodate the wastewater requirements anticipated for future growth</i>”, the report clearly indicates that this is based on “<i>approximated current operating conditions and populations</i>.” Having said this we do not believe these findings to be substantial evidence of available capacity in the existing Town sanitary sewer system. The applicant shall still be required to fully demonstrate that the existing sanitary sewer network can accommodate the development as proposed including available capacities and servicing allocation.</p>	SCS	<p>An assessment of the downstream sanitary sewer system has been completed confirming suitable conveyance capacity to the existing Green Valley SPS. Please refer to Appendix J of the FSSR.</p> <p>Please reference Section 7.1 and 7.2 of the FSSR for a summary of the Green Valley SPS and Bradford WPCP design allowances and available residual capacities in the system. It is our understanding the Town is currently completing a Master Servicing Study to assess the existing wastewater infrastructure to determine residual capacity and planned upgrades to the system.</p> <p>Confirmation of servicing allocation will be granted through the planning approvals for the proposed development.</p>
52.	While sanitary drainage plans have been provided they only indicate the area for each sanitary catchment area proposed. Catchment ID’s are to be updated to include all appropriate sanitary catchment information.	SCS	Addressed, please refer to the sanitary drainage plan on Figure 7.1 and 7.2 of the FSSR.
53.	<p>Sanitary sewer design sheets provided in appendix A, that are supposed to be preliminary design sheets for this development, appear to be for the BCH site to the east. If anticipated flows, associated with the subject development, have been input into these design sheets it should be demonstrated by including all pertinent sewer information for each proposed sewer leg within the design sheets.</p> <p>Also, the design sheets provided appear to reflect the proposed / accepted sewer information for the BCH development. As as-built data for these sewers is readily available, the design sheets should be updated to include / assess as-built information for the downstream piping network to the Line 6 sanitary pumping station.</p>	SCS	Please refer to the updated existing sanitary sewer design sheet using the as-built information in Appendix J of the FSSR.
54.	The report fails to assess the sanitary requirements of the development, or the existing sanitary sewer system in support of the development, therefore the Town does not support its findings. The report shall be updated to assess, at a minimum, the proposed developments sanitary demands and the existing sanitary sewer system in support of the proposed development.	SCS	Please refer to Section 7.0 and Appendix J of the FSSR.
55.	Exfiltration piping, associated with a roof and foundation drain collector (RFDC) storm sewer network, is proposed beneath the municipal roadway. Exfiltration pipe is not a system the Town can accept in the proposed location. It should also be noted that the proposed RFDC storm sewer network will require further discussion with the Town and justification on the need for this type of sewer.	SCS	Acknowledged, the exfiltration piping and RFDC sewer storm network have been removed from the proposed development.
56.	A reference to a watermain analysis report prepared by Municipal Engineering Solutions is made. It should be noted that this report was not part of the official circulated documents and therefore has not been reviewed at this time.	SCS	Acknowledged, the MES report has been included with the submission. See Appendix K of the FSSR.
57.	<p>Section 9.0 discusses that discharge from the northerly SWM pond will enter the downstream BCH storm sewer network. Demonstration that the BCH storm sewer system has been designed to accommodate anticipated flows from this pond is required.</p> <p>While we note a reference to a report prepared for BCH has been provided, relevant references and supporting materials from the report should be provided in the appendix of the report.</p>	SCS	Acknowledged, the northerly SWM pond has been removed. A portion of the storm sewer flows from the north part of the site will be directed to the existing BCH storm sewer through the use of a flow splitter, please refer to details within Section 5.2.1. An analysis demonstrating that the BCH storm sewer system (See Appendix E) can accommodate the anticipated flows is included in the FSSR.

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58.	Pre and post-development storm and sanitary drainage plans have not been provided and are required to demonstrate the developments storm and sanitary strategies and demands. It should be noted that storm events, up to and including the 100-year event, are to be controlled on site such that post-development flows match, or are less than, pre-development flows.	SCS	Refer to the FSSR for pre and post-development storm and sanitary drainage strategies including the post to pre-development stormwater control.
Stormwater Management Report			
59.	Section 2.1 references Appendix A, figure 3, for the location of “Point Q (flows at tributary and 6th Line)” as established in a 2008 R.J. Burnside report. The provided figure in the appendix, however, is a storm drainage plan by UEL for Bradford Capital Holdings (BCH). Appropriate references and supporting materials are to be provided for further consideration.	SCS	Note that Point Q is not used in the revised FSSR. The revised FSSR uses Point P, consistent with the Bradford Capital SWM Report for comparing flow rates at nodes. Supporting references and materials for Point P are included in Appendix B-5 of the FSSR.
60.	Section 2.2 of the report states that “The design criteria for stormwater management for the BHJV has been established previously in Burnside Master Plan in 2008 and has been advanced by the Bradford Capital and Bradford East Reports”. It should be noted that these reports are dated and should not be relied upon for the design of this development. The Applicant should analyze and assess existing town infrastructure, that the development is relying on, and demonstrate that the servicing of the development are available within the existing surrounding area municipal infrastructure.	SCS	The FSSR has been revised to analyze and assess existing town infrastructure and demonstrates that the servicing of the development are available within the existing surrounding area municipal infrastructure.
61.	The report discusses the south portion of development drainage as being proposed directly to the canal but does not indicate the storm drainage area that will drain here. The report is to be update to clearly indicate proposed drainage areas.	SCS	Refer to the existing and proposed storm drainage figures in the FSSR which illustrate the existing contours and drainage direction arrows and storm drainage boundaries.
62.	Section 2.3.2 notes 3 external drainage areas as “feeding the environmental protection lands”, however, the locations and boundaries of these drainage areas has not been clearly demonstrated. The provided “Figure 4”, as referenced in this section, does not clearly indicate the external drainage areas referenced. Please clarify.	SCS	Refer to the FSSR for revised storm drainage plan figures and the report for the description of the drainage direction of the external drainage areas.
63.	Figure 4 only indicates storm catchment area sizes and does not provide runoff coefficients or any other pertinent storm catchment data.	SCS	Refer to the revised FSSR figures for catchment areas including existing and proposed impervious values.
64.	Storm design sheets have not been provided for the sewer system proposed within the development and are required. Also, the design sheets provided for the BCH development appear to reflect the proposed / accepted sewer information. As as-built data for these sewers is readily available, the design sheets should be updated to include / assess as-built information for the downstream piping network being relied upon.	SCS	Storm sewer design sheets for the BCH development have been updated based on as-built information and are included in the updated FSSR.
65.	Major overland flow routes have not been indicated on the drawings and are required to demonstrate how flows in excess of the 10 year event will be conveyed to the SWM ponds.	SCS	Refer to the proposed storm drainage plan figure in the revised FSSR for major system flow arrows illustrating the major system overland flow route to the proposed SWM pond. An assessment of the critical major system overland flow conveyance capacity locations is included in the FSSR and confirms adequate capacity.
66.	A discrepancy is noted with the reported drainage area for catchment area 7011. Appendix A - Figure 3 indicates this area as 35.9 ha however within the SWM report, this area is referenced as 34 ha. Please clarify and adjust any design considerations accordingly.	SCS	All drainage areas have been reviewed and updated by SCS in the revised FSSR. Please refer to the revised FSSR.
67.	We question the accuracy of the provided elevations in the “SWM Facility 600-1 Stage-Volume Information” table within Appendix B2. Based on the provided elevations the max. pond elevation and extended detention elevation would be below the bottom of pond. Please clarify.	SCS	The SWM pond design has been updated by SCS. Please refer to the revised FSSR.

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68.	Tables 2.1 and 2.2 should be provided as a catchment area plan (in addition to the table) clearly indicating the location of all catchment areas listed and the intended drainage pattern for each. The current tables make it unclear as to where the discussed drainage areas are located and their intended drainage patterns (i.e. where are the individual catchment areas draining to, as each is draining somewhere different).	SCS	All drainage areas have been reviewed and updated by SCS in the revised FSSR. Please refer to the revised FSSR. Note that table numbers are different.
Planning Department – Town of Bradford West Gwillimbury Thomas Dysart, Senior Planner <i>July 19th, 2024</i>			
Provincial Policy Statement, 2020			
69.	<p>Please provide a review and analysis of whether and, if so, how the proposed development is consistent with the policies of:</p> <p>a) Section 1.1.3.8 of the PPS, 2020, which states that “<i>A planning authority may ... allow for the expansion of a settlement area boundary only at the time of a comprehensive review and only where [consistency with prescribed policies] has been demonstrated</i>”;</p> <p>b) Section 1.1.3.9 of the PPS, 2020, which states that “<i>Notwithstanding policy 1.1.3.8, municipalities may permit adjustments of settlement area boundaries outside of a comprehensive review provided</i>” that consistency with prescribed policies has been demonstrated;</p> <p>Planning Staff acknowledge that by way of application through a Zoning Order, the Zoning Order has the affect of including the subject lands within the urban area, thereby expanding the settlement area.</p>	MGP	<p>The Provincial Policy Statement, 2020 has been replaced with the Provincial Planning Statement 2024 (PPS 2024).</p> <p>A settlement area boundary expansion is not required to occur during a comprehensive review per the PPS 2024 however it should be noted that this application is submitted concurrently with the ongoing Simcoe MCR. As noted by staff, should a zoning order be approved, it has the effect of expanding the settlement area.</p>
70.	<p>Please provide review and analysis on whether and, if so, how the element of the proposed development to redesignate lands from “Rural” to exclusively the “Residential” designation, is consistent with the policies of:</p> <p>a) Section 1.1.1 of the PPS, 2020, which directs that “<i>Healthy, liveable and safe communities are sustained by</i>” such elements as:</p> <p>i. “<i>efficient development and land use patterns which sustain the financial well-being of ... municipalities over the long term</i>”;</p> <p>ii. “<i>an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons) ... institutional (including places of worship, cemeteries and long-term care homes) ... and other uses to meet long-term needs</i>”;</p> <p>iii. “<i>integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs</i>”; and</p> <p>iv. “<i>necessary infrastructure and public service facilities are or will be available to meet current and projected needs</i>”.</p> <p>b) Section 1.1.3.2 of the PPS, 2020, which directs that “<i>Land use patterns within settlement areas shall be based on densities and a mix of land uses which ...</i>” (non-exhaustive list of applicable policies):</p> <p>i. “efficiently use land and resources”;</p> <p>ii. “are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion”;</p> <p>iii. “support active transportation”; and</p> <p>iv. “are transit-supportive, where transit is planned, exists or may be developed”.</p>	MGP	<p>As noted, the Planning Opinion Report addressed these policies however since these comments were issued, the Provincial Policy Statement, 2020 has been replaced with the Provincial Planning Statement 2024 (PPS 2024). Please refer to the Planning Opinion Addendum that addresses the relevant policies of the PPS 2024.</p> <p>It should be noted that the revised Draft Plan introduces additional land use (institutional) via the proposed school block, in addition to additional walkways throughout the community to enhance connectivity. While the previous development contributed to a complete community, these additions will enhance the proposals contribution to a complete community.</p>

#	Comment	Response By	Response
	<p>c) Sections 1.3.1 and 1.3.2 of the PPS, 2020, which states that “<i>Planning authorities shall promote economic development and competitiveness by [means including but not limited to] ... a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs ...</i>”, and “<i>Planning authorities shall plan for, protect and preserve employment areas for current and future uses ...</i>”;</p> <p>d) Section 1.4.3 of the PPS, 2020, which states that “<i>Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area</i>” through consistency of planning decisions with prescribed criteria thereunder;</p> <p>e) Section 1.5 of the PPS, 2020, which states that “<i>Healthy, active communities should be promoted</i>” through consistency of planning decisions with prescribed criteria thereunder relating to “<i>public spaces, recreation, parks, trails and open space</i>”;</p> <p>f) Section 1.6.1 of the PPS, 2020, which states that “<i>Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they are ... available to meet current and projected needs</i>”;</p> <p>g) Section 1.6.6.1 of the PPS, 2020, which states that “<i>Planning for sewage and water services shall ... accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing ... municipal sewage services and municipal water services ...</i>”;</p> <p>h) Section 1.6.7.4 of the PPS, 2020, which states that “<i>A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation</i>”;</p> <p>i) Section 1.7 of the PPS, 2020, whose provisions include that “<i>Long-term economic prosperity should be supported by ... b) encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce; c) optimizing the long-term availability and use of land, resources, infrastructure and public service facilities; ... e) encouraging a sense of place, by promoting well-designed built form and cultural planning ... k) minimizing negative impacts from a changing climate and considering the ecological benefits provided by nature ...</i>”;</p> <p>j) Section 1.8.1 of the PPS, 2020, whose provisions include that “<i>Planning authorities shall support energy conservation and efficiency, improved air quality ... and preparing for the impacts of a changing climate through land use and development patterns which: a) promote compact form and a structure of nodes and corridors; b) promote the use of active transportation and transit in and between [various] uses and other areas ... e) encourage transit-supportive development ... to improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion; f) promote design and orientation which maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation and green infrastructure; and g) maximize vegetation within settlement areas, where feasible</i>”; and</p> <p>k) Section 4.6 of the PPS, 2020, which states that “<i>The official plan is the most important vehicle for implementation of [the PPS, 2020]. Comprehensive, integrated and long-term planning is best achieved through official plans. Official plans shall identify provincial interests and set out appropriate land use designations and policies ...</i>”.</p>		

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	<p>Note: The 2024 Planning Opinion Report does address some of the above policies, however, it is the Opinion of Staff that the Applicant should consider a wider mix of residential options; a mix of uses (i.e. commercial); blocks for public service facilities (i.e. schools, additional parks); active transportation options (i.e. trails, bike lanes); traffic mitigation measures (i.e. traffic circles); adequate buffers and transitional areas between existing residential uses; and, consider a comprehensive planning program that considers a development plan that can be better integrated into possible future development lands to the west of the subject property.</p> <p>Community Planning Staff defer to Town of BWG Development Engineering and Town of BWG Capital Division comments regarding the servicing capacity and required infrastructure upgrades.</p> <p>Recognizing, that the request for a Ministerial Zoning Order may provide relief from conformity to Provincial policies, the applicant should demonstrate how the proposed development considers these policies. These policies should be read in conjunction with comments from external agencies, internal departments and comments from the public about how these objectives are met.</p>		
A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020			
71.	Please provide review and analysis on whether and, if so, how the element of the proposed development to redesignate lands from “Rural” to exclusively the “Residential” designation, conforms to the policies of:	MGP	See responses below.
	a) Section 2.2.6.2 of the Growth Plan, 2020, whose provisions include that “... <i>municipalities will support the achievement of complete communities by ... b) planning to achieve the minimum ... density targets in this Plan; c) considering the range and mix of housing options and densities of the existing housing stock; and d) planning to diversity their overall housing stock across the municipality</i> ”;	MGP	The Growth Plan has been rescinded.
	b) Section 2.2.6.5 of the Growth Plan, 2020, which states that “ <i>When a settlement area boundary has been expanded ... the new designated greenfield area will be planned in accordance with policies 2.2.6.1 and 2.2.6.2</i> ”;		The Growth Plan has been rescinded.
	c) Section 2.2.7 of the Growth Plan, 2020, whose provisions include that “ <i>New development taking place in designated greenfield areas will be planned, designated and zoned in a manner that: a) supports the achievement of complete communities; b) supports active transportation; and c) encourages the integration and sustained viability of transit services</i> ”;	MGP	The Growth Plan has been rescinded.
	d) Section 2.2.8.2 of the Growth Plan, 2020, whose provisions included that “ <i>A settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that: a) based on the minimum intensification and density targets in this plan and a land needs assessment undertaken in accordance with policy 2.2.1.5, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the designated greenfield area: i. within the upper ... tier municipality, and ii. within the applicable lower-tier municipality; b) the proposed expansion will make available sufficient lands not exceeding the horizon of this Plan ... while minimizing land consumption ...</i> ”;	MGP	The Growth Plan has been rescinded.
	e) Section 2.2.8.3 of the Growth Plan, 2020, whose provisions include that “ <i>Where the need for a settlement area boundary expansion has been justified ... the feasibility of the proposed expansion will be determined and the most appropriate location for the proposed expansion will be identified based on the</i>	MGP	The Growth Plan has been rescinded.

#	Comment	Response By	Response
	<i>comprehensive application of all of the policies of this Plan, including the following: a) there is sufficient capacity in existing or planned infrastructure and public service facilities; b) the infrastructure and public service facilities needed would be financially viable over the full life cycle of these assets; c) the proposed expansion would be informed by applicable water and wastewater master plans or equivalent and stormwater master plans or equivalent ... j) the proposed expansion would meet any applicable requirements of the Greenbelt ... Plan and any applicable source protection plan ...”;</i>		
	f) Section 3.2.2 of the Growth Plan, 2020, whose provisions include that “ <i>Planning for new or expanded infrastructure will occur in an integrated manner, including evaluations of long-range scenario-based land use planning, environmental planning and financial planning, and will be supported by relevant studies</i> ” and involve prescribed criteria;	MGP	The Growth Plan has been rescinded.
	g) Section 3.2.3.1 of the Growth Plan, 2020, which states that “ <i>Public transit will be the first priority for transportation infrastructure planning and major transportation investments</i> ”;	MGP	The Growth Plan has been rescinded.
	h) Section 3.2.3.4 of the Growth Plan, 2020, whose provisions include that “ <i>Municipalities will ensure that active transportation networks are comprehensive and integrated into transportation planning ...</i> ”;	MGP	The Growth Plan has been rescinded.
	i) Section 3.2.7 of the Growth Plan, 2020, whose provisions include that “ <i>Proposals for large-scale development proceeding by way of a secondary plan, plan of subdivision ... or site plan will be supported by a stormwater management plan or equivalent</i> ” that satisfies prescribed criteria; and	MGP	The Growth Plan has been rescinded.
	j) Section 3.2.8.6 of the Growth Plan, 2020, which states that “ <i>New public service facilities, including hospitals and schools, should be located in settlement areas ...</i> ”.	MGP	The Growth Plan has been rescinded.
	Note: Recognizing, that the request for a Ministerial Zoning Order may provide relief from conformity to the Growth Plan policies, the applicant should have regard for the above noted policies. Specifically at it relates to reserved sites for public service facilities (i.e. schools), active transportation options (i.e. trails, bike routes) and the comprehensive planning of an area.	MGP	The Growth Plan has been rescinded.
72.	Please provide additional review and analysis of whether and, if so, how the proposed development has been demonstrated to conform to the cultural heritage resources policies of the Growth Plan, 2020 (Section 4.2.7). Please see notes under point 3, above (under PPS, 2020), for additional context.	MGP	The Growth Plan has been rescinded.
73.	The March 2022 POR is absent of any review and analysis of Sections 2.2.8.4, 2.2.8.5 and 2.2.8.6 of the Growth Plan, 2020. To the extent those policies apply, please provide review and analysis thereof in the context of the subject application. If those policies do not apply, please provide review and commentary to support that conclusion.	MGP	The Growth Plan has been rescinded.
Simcoe County Official Plan, 2016			
74.	Please provide review and analysis on whether and, if so, how the proposed development conforms to the policies of: a) Section 3.5.17 of the SCOP, 2016, which states that “ <i>Settlement area boundary expansions may occur only in accordance with an approved municipal comprehensive review that is consistent with the growth management study in 3.5.8 and where it has been demonstrated that</i> ” prescribed criteria have been satisfied; b) Section 3.5.18 of the SCOP, 2016, which states that “ <i>Where settlement area boundary expansion is needed to meet projected development needs as outlined in Section 3.5.17 above, the decision on direction or location of settlement area expansions shall be based on ...</i> ” prescribed criteria; c) Section 3.5.19 of the SCOP, 2016, which states that “ <i>... official plan amendments which recommend settlement area boundary expansions shall be based on, among other matters as described in Sections</i>	MGP	<ul style="list-style-type: none">• Section 3.5.17 – this expansion request is being made in conjunction with the County’s municipal comprehensive review. Appendix H of the Planning Opinion Report dated October 2023 for the OPA application responds to the settlement area expansion criteria.• Section 3.5.18, 3.5.19 and 3.5.21 – Refer to Appendix H of the Planning Opinion Report dated October 2023 for the OPA application responds to the settlement area expansion criteria.• Section 4.1.6 and 4.1.7 – The Proposed Development provides a considerable number of units to be added into the area including a range of single detached, semi-detached, street townhouse, and

#	Comment	Response By	Response
	<p>3.2 and 3.5, an EIS that demonstrates to the County and appropriate agencies, that there will be no negative impacts on the natural heritage features and areas ...”;</p> <p>d) Section 3.5.21 of the SCOP, 2016, which states that “<i>The ... official plan amendment for settlement area boundary expansion shall indicate the proposed land uses, major streets, road, storm water and utility services, population density, and staging of development over a period of up to 20 years. The plan should include an analysis of factors listed in Section 3.5.18</i>”;</p> <p>e) Section 4.1.6 of the SCOP, 2016, which states that “<i>Local municipalities will provide for an appropriate range of housing types and densities required to meet projected needs of current and future residents</i>”;</p> <p>f) Section 4.1.7 of the SCOP, 2016, which states that “<i>Local municipalities shall make available: sufficient quantity of housing, taking into account demand to improve choice; and, housing development in suitable locations, which offers a good range of public service facilities and proximity to jobs, key services, and infrastructure</i>”; and</p> <p>g) Section 4.8.42 of the SCOP, 2016, whose provisions include that “(a) Development proposals by secondary plan shall include pedestrian-friendly and transit supportive urban design elements ... [and] (b) ... age-friendly and transit-supportive urban design elements” including those respectively prescribed thereunder.</p>		<p>back-to-back townhouse units. This will not only expand the current housing stock within the area but also strengthen the local area’s ability to house a larger variety of individuals and families by supplying a greater range of dwelling type choices to fit their lifestyle needs. The housing offerings are located in proximity to community facilities such as two parks and a proposed school, while taking advantage of existing nearby infrastructure.</p> <ul style="list-style-type: none">Section 4.8.42 – Notwithstanding that this is not a secondary plan process, The proposed Draft Plan is planned as a complete community, with densities that are pedestrian, cycling and transit friendly. Further design elements will be confirmed through the detailed design process. Refer to the submitted urban design report for further details.
75.	Please provide additional review and analysis of whether and, if so, how the proposed development has been demonstrated to conform to the cultural heritage conservation policies of the SCOP, 2016 (Section 4.6).	MGP	See responses above.
Simcoe County Official Plan Amendment No. 7			
76.	Please provide review and analysis on whether and, if so, how the proposed development conforms to all applicable policies of the Simcoe County Official Plan, as proposed to be amended by SCOPA 7 (adopted by County Council in August of 2022, decision pending by the Province as of the date of this correspondence).	MGP	Please refer to Section 5.5.1 of the Planning Opinion Report.
Town of Bradford West Gwillimbury, 2023-Approved Official Plan			
77.	Please provide review and analysis on whether and, if so, how the proposed development conforms to the policies of:	MGP	While the Bradford Official Plan is not in-force for the Subject Lands, please refer to the responses below.
78.	a) Section 1.2.3 of the 2023 BWG OP, which states that “ <i>Through the OPR that led to the adoption of this Plan, conformity has been achieved with the 2020 Growth Plan through to 2031. A future OPR, following completion of the County’s current municipal comprehensive review, will bring this document into conformity through to 2051</i> ”;	MGP	Through the appeal of the Official Plan, it is our opinion that sufficient lands have been brought into the urban boundary to achieve the growth forecasts to 2031. This has been demonstrated in the numerous submissions to the Town and County.
79.	b) Section 3.2.2 of the 2023 BWG OP, which states that “ <i>A settlement area boundary expansion shall only be considered as part of a municipal comprehensive review ...</i> ”;	MGP	As noted earlier, a settlement area boundary expansion is not required to occur during a comprehensive review per the PPS 2024 however it should be noted that this application is submitted concurrently with the ongoing Simcoe MCR. As noted by staff, should a zoning order be approved, it has the effect of expanding the settlement area. The Bradford OP will need to be updated to reflect the removal of the Growth Plan and the update of the PPS 2024 to account for these changes, among others.
80.	c) Section 3.5.3 of the 2023 BWG OP, which states that “ <i>Existing and planned infrastructure is and shall be sufficient to accommodate the minimum growth targets to the year 2031 ... Updates to ... various servicing strategies, including the Master Servicing Plan and Transportation Master Plan, shall be required as part of implementing planning policies and capital planning to accommodate growth to the year 2041 ... Planning for new and expanded infrastructure will occur in an integrated manner, including</i>	MGP	The proposed development is located in an area well served by existing infrastructure, with only minimal extensions required. The road network can support the proposed development with minimal improvements. A comprehensive stormwater management strategy for the subject lands is the preferred approach, which has been submitted.

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	<i>evaluations of long-range scenario-based land use planning and financial planning ... as part of the County municipal comprehensive review.”</i>		In addition, the Subject Lands can be adequately serviced through the extension of existing utilities including hydro, gas, cable tv and telephone.
81.	d) Section 4.7h) of the 2023 BWG OP, which states that “ <i>Proposals to redesignate lands from the Rural designation may only be considered: i) As part of a settlement area expansion through a municipal comprehensive review ...</i> ”;	MGP	See response to comment #79.
Additional Comments			
82.	<p>In consideration of the proposed concept, Staff have a number of concerns relating to the layout, densities, and overall functionality of the lands as it intends to serve the municipality. Some suggestions that the applicant shall consider for an improved include:</p> <ul style="list-style-type: none">a) Development of appropriate buffer and transition areas adjacent to Brownlee and Golfview subdivisions (can include larger lot sizes, greenspace buffer, including trail networks).b) Consideration of larger development blocks to facilitate higher residential density blocks or blocks for future institutional uses (see SCDSB comments)c) Consideration of future development blocks to allow for higher order uses (i.e. Mixed Use blocks) following the acquisition of under developed residential lots adjacent to the proposed development (i.e. Line 6 properties)d) Consideration of further opportunities for active transportation, trails and parks plan for the development.e) Consideration of a centralized park which retains the existing golf clubhouse; other park amenities throughout the development that caters to other users i.e., open passive recreation, tot lots, etc.f) Increased densities, that include a variety of housing types in appropriate locations (i.e. detached and semi houses, back to back towns, mid-rise buildings, live/work units.g) Consideration of an alternative development plan on the west side of Brownlee that would enable a more orderly layout in the future.h) Protection of view corridors to the Holland Marsh from Brownlee Drive cul-de-sac.	Owner/MGP	<ul style="list-style-type: none">a) Walkways have been introduced in areas of transition including adjacent to Brownlee and Golfview subdivisions to enhance connectivity while also providing buffer space between existing and new lots.b) A school block has been introduced within the Draft Plan, central to the proposed developmentc) The Owner has considered this and does not believe there is a market for this in this area. There are sufficient areas for higher density housing forms within the development.d) Additional walkways have been introduced to supplement the two proposed parks. Additional trails within blocks can be explored through detailed design.e) It is our opinion that the two proposed park blocks provide sufficient recreational opportunities within walking distance of existing and future residents to utilize.f) A sufficient range of housing options that is appropriate for this site given its context has been proposed including single detached, semi detached, street townhomes and back to back townhouses. This will add to the diversity of housing stock within the Town.g) The environmental protection block, stormwater management block and park block provide sufficient protection of land in the southern part of the plan that will protect view corridors of the Holland Marh.
83.	<p>Please provide additional explanation and clarification to the contents of Section 3 of the March 2022 POR, submits that “<i>a boundary expansion will be required in order to meet the growth targets</i>” to the year 2031, to the extent proposed by the subject application.</p> <p>Note: The March 2022 POR refers to Parcels 5 and 34 from the March 14, 2017 Land Needs Study Addendum as contributing towards the “<i>overestimation of] the number of units that can be accommodated on the remaining greenfield residential land within the Town’s urban boundary</i>”, and those parcels have a cumulative land area of approximately 34 hectares. By way of the subject application, approximately 54 hectares are sought to be included within the settlement area boundary, and designated as “Residential”.</p>	MGP	As per the multiple submissions made as part of the Town’s OPR, there are numerous reasons as to why the land needs assessment incorrectly concluded that there was sufficient land required to accommodate growth to 2031. One of these reasons is the inclusion of lands within the supply that would not be available to be used given the Highway 400-404 link project. This was one of many reasons including servicing constraints, density assumptions, secondary suite assumptions and intensification targets. Collectively, for the above-noted reasons, it is our opinion that there is an overestimation of the residential land supply in the MCR. As a result, the MCR is overestimating the number of units that can be accommodated on the remaining greenfield residential land within the Town’s urban boundary and a boundary expansion will be required in order to meet the growth targets.

#	Comment	Response By	Response
84.	With approval of the 2021-adopted BWG Official Plan by the County on March 14, 2023 (pending future appeal(s), the proposed Amendment to the Town’s Official Plan would require update/modification, as considered in Section 1.0 of the March 2022 Planning Opinion Report by MGP.	MGP	Acknowledged. It should be noted that if the MZO were approved, no OPA would be required.
85.	Please be advised that Town staff have begun its growth management work, by hosting a Section 26 meeting on June 25, 2024.	MGP	Acknowledged.
86.	Please be advised that comments contained in this correspondence are intended to focus on the proposed Zoning Order and the Draft Plan of Subdivision and supporting materials.	MGP	Acknowledged.
87.	Staff note that the submission of a request for a Ministerial Zoning Order enables the Applicant to seek a decision which may not be consistent with or conform to Provincial, County or Municipal Land Use policies. Staff note that, if the Zoning Order were approved, zoning would be in effect to support development of the Plan of Subdivision as presented, without opportunity for modifications (albeit subject to technical conditions).	MGP	Acknowledged.
88.	Please be advised that the policies referenced above do not necessarily represent an exhaustive list of all applicable policies, and that the proponent’s consultant must carry out a comprehensive review and analysis of the proposal in consideration of all applicable policies, up to the point of a decision being sought by Town Council on the request for a Municipal Zoning Order.	MGP	Acknowledged. Please refer to the submission materials provided as well as the Planning Opinion Addendum.
89.	Please be advised that, consistent with the comprehensive application of Provincial policies and legislation which requires land use planning and development proposals to rely on the expertise of various disciplines, demonstration of consistency and conformity of development applications is reliant upon subject matter experts in other areas. Accordingly, please note that these comments and associated review of consistency and conformity with applicable policies must be carried out in parallel with review of all comments provided in response to application, including all associated submission materials.	MGP	Acknowledged.
90.	Until such time as the application is supported by a complete review and analysis of all applicable policies including but not limited to those referenced in Section 4 of this correspondence (including supporting materials, to the satisfaction of all applicable reviewers), staff submits the Town has not received sufficient information to evaluate whether or not the proposal is consistent with and conforms to all applicable Provincial and municipal land use planning policies. Accordingly, staff submits that the proposal has not been demonstrated to be consistent with and conform to all applicable policies, at this time.	MGP	Acknowledged.
91.	Please note that Community Planning reserves the ability to provide updated and/or revised comments through further review and consideration of the application, including all existing and future supporting materials	MGP	Acknowledged.
Consultation			
92.	Please provide one or more comments response matrix which summarizes all written and oral submissions made in response to the application, and provides a proposed explanation of the effect, if any, that such written and oral submissions may have on a decision of Council in response to the application.	MGP	See responses to the comments in this matrix.
93.	For further review and consideration, please find hereunder a hyperlinked URL to the video captured during the May 31, 2022 Public Information Meeting (“PIM”) held in regards to the Official Plan Amendment application. For convenience, please note that the PIM for the subject application begins approximately 35 minutes after the start of the Special Meeting of Council, with a PIM for a different development proposal preceding the PIM for the subject application. Additionally, please find attached the Minutes from the May 31, 2022 Special Meeting of Council. https://www.youtube.com/watch?v=PQs1XeVmM7o	Owner	Acknowledged.

#	Comment	Response By	Response
	<p>In addition, hyperlinked below is the URL to the video capturing during the June 11, 2024 Public Information Meeting (“PIM”) in reagards to the Zoning Order and the Draft Plan of Subdivision. Please note that the public comment portion of the meeting beings at approximately 22:55.</p> <p>https://www.youtube.com/watch?v=EPYQlrwWS0Q</p>		
Fire & Emergency Services – Town of Bradford West Gwillimbury Aimee Jordan, Fire Prevention Inspector <i>January 9th, 2024</i>			
94.	<p>Aimee Jordan, Fire Prevention Inspector of Bradford West Gwillimbury Fire and Emergency Services has reviewed the documentation relating to the above application. Our department has no objections to the proposal with the exception of the following comments:</p> <ul style="list-style-type: none">• Fire department access throughout the streets shall be designed to support the expected loads imposed by firefighting equipment and be surfaced with concrete, asphalt or other material designed to permit accessibility under all climatic conditions.• An adequate water supply for firefighting is required to be provided in conformance with the OBC.• Fire break lots shall be approved by our department prior to construction.	SCS/BA Group	<p>All roads within the development will be designed and constructed in accordance with Town standards, and will be suitable for supporting loads imposed by fire fighting equipment.</p> <p>Adequate fire supply to the development has been confirmed by the Watermain Distribution Model prepared by MES.</p> <p>Fire break lots will be confirmed at the detailed design stage.</p>

Engineering – Lake Simcoe Region Conservation Authority			
February 26 th , 2024			
General			
95.	<ul style="list-style-type: none">All reports are to be prepared as a standalone document. All references must be included within a document or appendix.Please provide signed and sealed engineering drawings and reports.Please provide digital copies of all applicable models (hydrology and hydraulics) used in SWM design per LSRCA requirements.Please revise SWM report to address current LSRCA SWM technical guidelines and phosphorous offsetting policy.Please be advised that a permit will be required from the LSRCA for any works within a regulated area, as per the Conservation Authorities Act and Ontario Regulation 179/06. Please note the permitting process is separate from the Planning Act process.	Various	Acknowledged.
SWM Report & Drawings			
96.	Existing drainage features exist on the development site. Please revise the development drawings delineating existing drainage features with setbacks per LSRCA mapping and input from natural heritage. It should also be noted that external flow is being conveyed through these drainage features.	SCS	The figures have been updated to reflect the drainage features and is coordinated with the EIS and the draft plan. All external drainage that enters the site will be accommodated for and is addressed in the revised FSSR.
97.	Please include LSRCA regulations limits on all applicable drawings and figures. Please ensure that any development (SWM facilities, park) is proposed outside of the regulated area. It is strongly advised to confirm developmetn limits before finalizing stormwater management plan.	SCS	The LSRCA regulation limit has been shown on all figures. Prior to construction a permit pursuant to Ontario Regulation 41/24 will be obtained for any work within the Regulated area.
98.	The development limits shall exclude any environmental protection areas, existing residentail properties and external drainage areas. These areas will remain unchanged in pre and post development conditions and shall be clearly delinated on figures, drawings and calculations as “existing external”.	SCS	The revised FSSR figures illustrate the development limits that have been coordinated with the EIS and Draft Plan. Labels for “existing external” has been shown on the figures.
99.	Existing residential properties exist around the development site. The drainage patterns are changed in post-development conditions. For existing flow conveyance, municipal easement and approval will be required.	SCS	Refer to the revised FSSR for descriptions of the existing residential drainage surrounding the site.
100.	LSRCA permit and landowner’s authorization will be required for any works within the regulated area.	Owner/SCS	Acknowledged.
101.	<u>Section 1.0</u> The development area of 60 ha, 64 ha and 85 ha are referenced. Please revise per above noted comments. Please add development limits to to all figures and drawings.	SCS	Note that report sections have changed with the change of engineering consultant preparing the FSSR. Inconsistencies related to the development area have been resolved and the development limits are shown on all figures.
102.	<u>Section 2.1</u> <ul style="list-style-type: none">Please confirm the location. 80 m east or west of Brownlee Drive?Please confirm the ownership of proposed wet SWMPs and provide acknowledgement from the municipality that there are in the agreement of proposed drainage plan and future ownership.Please be advised that external agencies approval will be required for the proposed SWMP.Please show location of SWM ponds 702-2, 701-1 and Point Q on pre- and post-development drainage delineation figures. Please provide a copy of approved CofA as part of the SWM report to confirm SWM criteria as BHJV development will drain to existing facility 702-2.	SCS	Note that report sections have changed with the change of engineering consultant preparing the FSSR. We trust that the revised FSSR which includes a revised stormwater management plan will clarify previous comments. The stormwater management pond will be owned and operated by the Town of Bradford West Gwillimbury as it services a subdivision development. All applicable external agencies approval will be obtained for the proposed stormwater management pond. The location of the SWM pond is shown on the proposed storm drainage figure. Note that Point Q is not used in the revised FSSR. The revised FSSR uses Point P, consistent with the Bradford Capital SWM Report for comparing

			flow rates at nodes. Supporting references and materials for Point P are included in Appendix B-5 of the FSSR. Point P is shown on Figure 3.3. The Certificate of Approval for the Bradford Capital Holdings stormwater management pond is included in AppendixB-5 of the FSSR.
103.	<u>Section 2.2</u> Please provide excerpts from previously approved master drainage plans for established design criteria. This information shall be included as part of the SWM report per Appendix A.	SCS	Note that report sections have changed with the change of engineering consultant preparing the FSSR. Excerpts supporting the design criteria are included in the revised FSSR.
104.	<u>Section 2.3</u> <ul style="list-style-type: none"> Please provide separate pre and post development drainage delineation figures for North and South areas per LSRCA technical guidelines Appendix A. The catchment identification shall be consistent with Table 2-1 and 2-2. Please identify all downstream outlet points (including development limits, external drainage areas). Please provide pre-development calculations and figures per LSRCA SWM technical guidelines. Please add a separate section in the SWM report. Please ensure that the catchment areas in the Tables and Figures are consistent. Areas in Table 2.3, Table 2.8 and Figure 4 do not match. Please address existing flow conveyance for external catchment 6400. Table 2-1 shows the flows will be bypassing the proposed SWM facility. Table 2-2 refers to external drainage areas draining to environmental protection area and wetland (8300,8400,8500). Please confirm whether the same drainage pattern exists in pre-development conditions. For any external drainage flowing through the site, please provide supporting calculations to demonstrate safe conveyance of stormwater to a sufficient outlet per section 3.2.3 of LSRCA SWM Guidelines. 	SCS	Note that report sections have changed with the change of engineering consultant preparing the FSSR. Please refer to the revised FSSR which addresses these items.
105.	<u>Section 2.4</u> <ul style="list-style-type: none"> Please provide land use area breakdown and summary table for pre and post development conditions. Please provide detailed Tp calculations for external areas as noted in Table 2.3 and Table 2.8. Please revise applied TIMP and XIMP values per LSRCA guidelines for Table 2.6 and Table 2.8. There are existing residential properties on Brownlee Drive. Please confirm the existing drainage pattern. Per Figure 4, the drainage areas are divided between North and South (6200 – 4.41 ha, 8600-10.27 ha, 6300 – 3.89 ha, 8900-2.39 ha). These areas should be delineated as external existing and should not be considered as part of the development. Revise figures and report. Please confirm if catchment 6600-1.21 ha and 11000 – 0.9 ha represents rear yards of existing residential lots. If so, please address conveyance of existing drainage. The lots are proposed (as part of the development) west of the existing lots per Figure 4. Municipal easement will be required for the flow conveyance through the development site. Existing drainage patterns are changed, and drainage is divided in post development conditions. Table 2.6 refers to previously calculated flows at SWM facility 700-2. Please include supporting documents from previously approved SWM report. Please include regional flows as part of the hydrologic model and tables. Please confirm whether the SWM facility 800-1 and park are being proposed in LSRCA regulated area. Please ensure that all development (SWM facilities, park) is located outside a regulated area. Please demonstrate overland flow conveyance on applicable drawings and provide supporting calculations (as applicable). 	SCS	Note that report sections have changed with the change of engineering consultant preparing the FSSR. Please refer to the revised FSSR which addresses these items.

106.	<p><u>Section 2.4</u></p> <ul style="list-style-type: none"> • Please add a separate section to address volume control. • Please demonstrate that effort has been made to follow the Low Impact Development (LID) approach by incorporating lot level and conveyance controls as recommended in the MOE Stormwater Management Planning and Design Manual (March 2003) and LSRCA Technical Guidelines for Stormwater Management Submissions, 2022. • Please provide detailed calculations for volume control per LSRCA Technical guidelines Section 3.2.4. It should be noted that water balance and volume control are separate requirements. • Please provide a post development plan/figure indicating the areas to be treated by LIDs for phosphorus reduction. • The design of any infiltration-based facilities needs to be based on infiltration rates determined by in-situ infiltration testing method outlined within the Stormwater management Criteria Guidelines. • Please demonstrate through cross section that the proposed LIDs have a minimum separation of 1 m between the invert of the facility and the seasonal high groundwater elevation. • Municipal infrastructure (such as park) shall not be used to meet volume control requirements for the development site. Additional LIDs to address volume control on the development site shall be explored. • LIDs should be in such a way as to prevent future interference (not across property lines, i.e. not continuous). • Written confirmation from the municipality that they agree to include a warning clause within the subdivision agreement, as well as registered on title, indicating that all future purchasers/owners are informed about the SWM infrastructure on their properties and are obligated to maintain this infrastructure. • A landowner's information package provided to all existing and current property owners outlining how the LIDs are to be maintained. • Please revise TP offsetting calculations per above noted comments. Please be advised that there is no sod farm proposed. 	SCS	Note that report sections have changed with the change of engineering consultant preparing the FSSR. Please refer to the revised FSSR which addresses these items.
107.	<ul style="list-style-type: none"> • Erosion and sediment plan, notes and details per section 5.0 and Appendix G of the LSRCA Technical Guidelines will be required for any works within LSRCA regulated area. • Please provide a construction phasing section (including external works) as part of the SWM report. • Municipal approval will be required for the development site area (outside LSRCA regulated area) for erosion and sediment control plan. 	SCS	The revised FSSR acknowledges the requirements for the erosion and sediment control plans. Detailed erosion and sediment control plans including construction staging will be provided with the detailed engineering design and all appropriate approvals will be obtained prior to construction.
108.	Please note that additional information has been requested as noted above for LSRCA to further review the application. Once this information has been provided, additional comments may be forthcoming.	SCS	Noted.
109.	Please ensure that a complete response to each comment is provided with the next submission outlining how each comment has been addressed and where in the text of the report / drawings the comment has been addressed.	SCS	Complete responses are provided.
Hydrogeology			
110.	The site is mapped as being within the WHPA-Q2. As such, Policy LUP-12 of the South Georgian Bay Lake Simcoe Source Protection Plan is applicable. The site is also mapped in a Significant Groundwater Resource Area (SGRA) and an Ecologically Significant Groundwater Resource Area (ESGRA). As such, Policy 6.40-DP of the Lake Simcoe Protection Plan is applicable. Pre-development recharge must be maintained onsite.	WSP	Discussion around recharge related concerns is provided in the stand-alone Water Balance report (WSP, 2024).
111.	This site will be subject to the Lake Simcoe Protection Plan Water Balance Recharge Policy. Please see: https://www.lsrca.on.ca/Shared%20Documents/lspw-water-budget-policy.pdf	WSP	Noted.

112.	It is recommended the Hydrogeological Assessment include a Source Water section to indicate and describe the source water protection areas mapped across the site (i.e., WHAP-Q2 and SGRA/ESGRA).	WSP	A section (2.4) has been added to the report describe the source water protection considerations related to the Site.
113.	The Hydrogeological Assessment should be prepared as a standalone document (i.e., all references, calculations and drawings, Thornthwaite-Mather water balance assessment, are included within one document). Please see the link below for Hydrogeological Assessment Submissions Guidelines: https://www.lsrca.on.ca/Shared%20Documents/permits/hydrogeological%20_guidelines.pdf?pdf=Hydrogeological-Guidelines	WSP	For the purposes of the current submission the water balance evaluation has been prepared as a stand-alone document.
114.	<u>Sections 2.1, 2.2 and 2.4.4</u> As noted in Section 3.1.2 of the Guideline please provide a description and figure of surficial topography and drainage across the site. Identify drainage catchment areas and indicate any water features across the site.	WSP	Figure 2 of the report includes the current site topography and drainage features. The topography contours have been enhanced on the figure to improve clarity. Catchment areas for the water features are shown in the stand-alone water balance report (WSP, 2024).
115.	<u>Section 2.4.4</u> Piezometers were installed adjacent to existing drainage features in 2017. Table B shows that the piezometers were only monitored in April, May and October 2017. Please complete groundwater level monitoring of the applicable piezometers monthly between March 1 to June 30 to capture the seasonally high groundwater levels. Note it is preferred that monitoring be completed monthly for at least 12 months to establish stabilized seasonally high groundwater levels and trends. Please provide a description of the surface water features and functions as per Section 3.1.10 of the Guideline.	WSP	The monitoring conducted to date indicates that the groundwater level at the piezometers completed adjacent to existing drainage features was essentially at ground surface. These conditions are expected to prevail along the drainage features. A description of the surface water features and functions at the Site is provided in the Environmental Impact Study (Beacon, 2024).
116.	<u>Sections 2.4.1 and 3.1</u> Boreholes were advanced across the site as part of an earlier investigation and in 2022 as part of the current Hydrogeological Assessment. Please note as indicated in Section 3.1.6 of the Guideline grain size analysis of representative soil samples should be included in the appendix.	WSP	Grain size data collected in the previous studies is presented in the geotechnical report. A copy of this data has been included in the hydrogeological report (Appendix D).
117.	<u>Section 3.1</u> As noted in Section 3.1.5 Geology and Soils of the Guideline, please include a characterization of soil stratigraphy and characterization of the hydrostratigraphic units (including local and regional aquifers). Two cross-sections were completed for the site. It is preferred that the locations of these cross-sections are shown on a plan. Due to the size of the site, it is recommended that additional cross-sections are completed from the west to east. Additionally, the cross-sections should show groundwater levels collected from the same monitoring date. It is also recommended that these cross-sections include data collected from the MECP well water records to identify potential aquifers, given the artesian conditions recorded in BH22-03.	WSP	The location of the two sections (A-A', and B-B') are shown in plan view on Figure 2 of the report. The existing cross sections have been updated to show groundwater levels collect on the same monitoring date (or similar time of year when measurements on the same date were not available). An additional cross section has been added to the report (C-C'; Figure 4C) including MECP water well records in the area.
118.	<u>Section 2.4.4 and 3.2</u> Groundwater monitoring wells and piezometers have been installed across the site. These have been monitored at various frequencies since 2016. Please complete groundwater level monitoring of all site monitoring wells and piezometers monthly between	WSP	Groundwater monitoring was completed at four monitoring wells for a period of one year using continuous pressure transducers. The hydrographs from the transducer measurements are provided in the report.

Commented [DD1]: @Davidson, Christopher can you confirm this?

Commented [CD2R1]: Yes they will be shown, though on the attachment figure only from SCS.

	<p>March 1 to June 30 to capture the seasonally high groundwater levels. Note it is preferred that monitoring be completed monthly for at least 12 months to establish stabilized seasonally high groundwater levels and trends. Groundwater level data should be used to:</p> <p>A. Determine if a 1 metre separation between the bottom of infiltration-based LIDs and the water table can be maintained throughout the year.</p> <p>Determine the building depth that may extend below the water table and assist in quantifying the amount of permanent dewatering that will be required.</p>		<p>Determination of the dewatering requirements for individual structures (both short-term and long-term) will be confirmed as part of the detailed design process.</p> <p>An evaluation of the use of LID features, including a discussion of separation between the bottom of the LID features and the inferred seasonal high groundwater level, is provided in the Function Servicing and Stormwater Management Report (SCS, 2024).</p>
119.	<p><u>Section 2.3</u></p> <p>The report notes 88 domestic water supply wells within 200 m of the site. It is recommended that the limit increase to 500 m as per Section 3.1.8 of the Guidelines. Although, it is assumed that many of the residential properties are connected to municipal services and wells are no longer active, these should be confirmed/indicated as such within the report. It is recommended a house-to-house survey be completed to confirm the location, construction details and water levels.</p>	WSP	<p>A house to house survey of private well users will be completed as part of the on-going construction dewatering evaluation, and will be based on the characterization of the dewatering requirements and potential zones of influence.</p>
120.	<p><u>Section 2.4.3 and 3.3</u></p> <p>Hydraulic conductivity testing was completed across the site as part of the past and current Hydrogeological Assessment. Please provide a summary table of all the data.</p> <p>Please note hydraulic conductivity is insufficiently detailed to assess the <i>in-situ</i> percolation rate since the horizon represented through the screened interval of the monitoring well is often unlikely to represent the depth of any proposed infiltration facilities. Please note <i>in-situ</i> percolation testing should be carried out using a Guelph Permeameter of similar method.</p>	WSP	<p>In-situ percolation testing is planned to be conducted at the Site in conjunction with the on-going LID design and planning.</p>
121.	<p><u>Section 3.2</u></p> <p>A groundwater flow map was prepared for the site.</p> <p>Please update the groundwater flow map (Figure 5) using seasonally high groundwater levels of all monitoring instruments and provide the date in the legend. Note it is preferred that topography elevations also be plotted on the groundwater flow map to adequately analyze areas of potential groundwater discharge.</p>	WSP	<p>The groundwater flow map has been updated to features measurements of seasonally high levels. The same change was made for water levels shown on the cross sections.</p>
122.	<p><u>Section 3.4</u></p> <p>Groundwater sampling was completed and compared to the PWQO. It is recommended that surface water quality sampling (i.e. PWQO) be completed for general characterization. Please refer to Section 3.1.12 of the Guideline.</p>	WSP	<p>Surface water quality characterization will be conducted as part of the on-going dewatering evaluation.</p>
123.	<p><u>Section 3.4 and 4.0</u></p> <p>The groundwater quality sample found that with filtration, total phosphorous exceeded the PWQO standard.</p> <p>LSPP 6.40-DP states that the quality and quantity of groundwater in (SGRA/ESGRA) areas and the function of recharge areas will be protected improved or resorted. Please note that effluent from any dewatering (construction and/or long-term) is to be treated for PWQO exceedances and returned to the environment.</p>	WSP	<p>Noted.</p>
Water Balance			

124.	Please ensure all reports, drawings, and relevant supporting material (where applicable) are stamped, signed, and dated by the Hydrogeologist and/or Engineer.	WSP	Water balance has been stamped by a Water Resources Engineer.
125.	Please provide a table of Thornthwaite and Mather Water Balance approach showing the monthly calculations of Potential ET, Actual ET and the annual surplus for the selected climate station. Please refer to Table 1 in the Hydrogeological Assessment Submission Guideline.	WSP	Monthly Thorthwaite results are provided per Attachment A Table 1 in the guidelines.
126.	Table 2 post-development landscape has a slope factor of 0.1 (hilly) whereas pre-development slope factor was 0.1 to 0.2. Please ensure the post-development slope factor coincides with the site grading plan.	WSP	Post development grading factor was revised to 0.1
127.	Pre-development infiltration volume has been calculated to be 86,000 m ³ Table 4 shows post-development water balance, including roof to infiltration as 9000 m ³ /yr. Please show two separate water balance tables of post-development and post-development with mitigation	WSP	Both Proposed (No Mitigation) and Proposed (Mitigated) conditions are now shown in the water balance report.
128.	Please provide all water balance calculations in a table format in the appendix.	WSP	Monthly Thorthwaite results are provided per Attachment A Table 1 in the guidelines.
129.	Please provide catchment-based water balances (pre-development, post-development and post-development with mitigation) for the mapped drainage areas identified in the Stormwater Management Report.	WSP	Water balances for the mapped drainage features are provided in the water balance report.
Stormwater Management			
130.	<u>Section 3.1 and Appendix D2</u> Hydraulic conductivity is insufficiently detailed to assess the <i>in-situ</i> percolation rate since the horizon represented through the screened interval of the monitoring well which is often unlikely to represent the depth of any proposed infiltration facilities. Please note <i>in-situ</i> percolation testing should be carried out using a Guelph Permeameter or similar method.	SCS	In-situ infiltration testing following the Guelph permeameter or similar method will be completed prior to detailed design and is discussed in the revised FSSR. The high groundwater level is interpreted to be approximately at the existing ground elevation, therefore, infiltration measures are proposed only in areas that are being filled to provide 1 m separation between the high groundwater level and the bottom of the infiltration trench. Therefore, infiltration testing will occur just below the existing topsoil level.
131.	<u>Section 3.1</u> Infiltration trenches are proposed in the Park Block and across several Lots. Please demonstrate that there will be a minimum separation of 1 m between the invert of any infiltration facility and the seasonally high groundwater level.	SCS	Based on WSP's hydrogeological assessment, the high groundwater level is interpreted to be approximately at the existing ground elevation. A comparison between the proposed finished ground elevation and the interpreted high groundwater elevation shows that 1 m separation between the bottom elevation of an infiltration facility and the seasonally high groundwater level cannot be provided at the park location. Therefore, no infiltration LID is proposed at this location. Refer to the revised FSSR for further information and a groundwater depth figure.
132.	<u>Appendix D1</u> Please note Appendix D1 is not included in the report.	SCS	Note that report Appendices have changed with the change of engineering consultant preparing the FSSR. All appendices are provided in the revised FSSR.
133.	<u>Appendix D3</u> Following <i>in-situ</i> testing, please update calculations demonstrating that the proposed infiltration facilities are sized appropriately to mitigate the post-development infiltration deficit, and the infiltration facilities will drawdown fully within the preferred 24-48 hour time-frame.	SCS	The revised FSSR includes a calculation in Appendix G for the sizing of the proposed year yard infiltration trenches including a drawdown time calculation based on the single well response test results. This will be updated at detailed design following the completion of in-situ infiltration testing.
134.	<u>Appendix D3</u>	SCS	A standard detail illustrating the rear yard infiltration trenches, including the requirement for groundwater to be a minimum 1 m below the bottom of the

	Please provide cross-sections of the proposed LID facilities. Include all dimensions, materials used, include the seasonal high groundwater elevation, current and proposed grading and the frost level.		infiltration trench has been included in the revised FSSR. The groundwater depth map in the FSSR has been prepared to demonstrate locations for the rear yard infiltration trenches which will provide the minimum 1 m separation to the seasonally high groundwater level. The frost level is not relevant as the infiltration trenches are not needed to operate and not accounted for in the water balance calculations during frozen ground conditions. This information is sufficient to demonstrate the functional design and detailed cross sections and design details will be provided at the detailed design stage.
135.	<u>Appendix D4</u> Water balance pre- development and post-development values between WSP (Sept 20, 2023) water balance report and current report do not match. Additionally different climate stations were referenced. Please ensure values in each report are cohesive.	SCS	The FSSR includes excerpts from the water balance report and has been checked for consistency.
136.	Foundation drain collectors are proposed. LSPP 6.40-DP states that the quality and quantity of groundwater in SGRA/ESGRA areas and the function of recharge areas will be protected improved or resorted. Long-term dewatering will reduce the recharge in these areas. Please consider water-proofing as an alternative, such that dewatering is not required. Note that it is the responsibility of the applicant to ensure that all systems relating to dewatering be maintained in perpetuity.	SCS	The proposed grading within the development has been raised as much as possible while maintaining safe vehicular access to the existing roads surrounding the development, in accordance with Town standards. That said, we believe there will be some interaction with the proposed foundations/weeping tiles with the high groundwater elevations. The extent of groundwater interaction will be confirmed by WSP under separate cover. Any incidental groundwater that interacts with the weeping tile will outlet by gravity to the Municipal storm sewer system, ultimately outletting to the natural environment. The Municipality will be maintaining this sewer system in perpetuity. We do not believe it is feasible to eliminate the weeping tiles on the homes by way of water-proofing. The Ontario Building Code requires drainage (i.e. weeping tile) to be provided at the bottom of every foundation wall that contains the building interior (i.e. basement).
Functional Servicing			
137.	Foundation drain collectors are proposed. LSPP 6.40-DP states that the quality and quantity of groundwater in SGRA/ESGRA areas and the function of recharge areas will be protected improved or resorted. Long-term dewatering will reduce the recharge in these areas. Please consider water-proofing as an alternative, such that dewatering is not required. Note that it is the responsibility of the applicant to ensure that all systems relating to dewatering be maintained in perpetuity.	SCS	Refer to response to comment 136.
138.	It is highly recommended to install servicing plugs to prevent the preferential movement of groundwater within the more permeable bedding material.	SCS	Anti-seepage collar locations on servicing trenches will be incorporated at the detailed design stage.

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Natural Heritage – Lake Simcoe Region Conservation Authority February 26 th , 2024							
NH1	EIS	General		Update the wetland boundaries and associated buffer on the subject property to reflect the wetland staking exercise completed on June 8, 2022. This wetland is a key natural heritage and key hydrologic feature within the natural heritage system of the Greenbelt Plan, Section 3.2.5 of which prohibits development or site alteration within these features and associated minimum 30m vegetation protection zone. Please revise the plan and update all figures and relevant sections of the EIS.	The Environmental Impact Assessment (Beacon 2023) has been updated accordingly. Refer to Figure 2 – Existing Conditions and Figure 4 -Constraints to view the mapped staked features and their associated buffers.	Partially addressed: According to Section 6.24-DP of the LSPP, the minimum vegetation protection zone for all key natural heritage and key hydrologic features is 30m (as noted in Section 2.6 of the EIS). A consistent 30m VPZ needs to be applied to KNHF/KHF on the subject property. These VPZ must contain natural, self-sustaining vegetation.	30 m will be shown where appropriate and buffer difference will be addressed through compensation on site and EOS thereafter. Please refer to Figure 3 of the EIS (Beacon 2024) for identification of KNHF/KHF and VPZ.
NH2	Draft County OPA, Draft Town OPA	General		The majority of the additional wetland area staked on June 8, 2022 is captured within the Greenbelt natural heritage system and appropriately excluded from the revised urban boundary proposed in the draft OPA. Update the revised urban boundary to exclude the entirety of this feature and associated 30m minimum vegetation protection zone.	The portion of the Subject Lands that is proposed to be brought into the County Settlement Area boundary remains the same. No changes are required.	The LSRCA is no longer able to comment on the Greenbelt Plan on behalf of the Town of Bradford-West Gwillimbury. Please ensure municipal requirements are met.	Noted.
NH3	EIS	4.2	12-13	During the site visit on June 8, 2022, LSRCA staff observed flow in both drainage features D and E, which differs from the results described in Section 4.2. This is typical of intermittent watercourses – dry at times and flowing others. These are Key Hydrologic Features; LSRCA is not supportive of piping these features and the plan needs to be revised.	This comment has been addressed in the revised Environmental Impact Study (Beacon 2023) which will be submitted for agency review and comment as part of the upcoming ZBA and Draft Plan submission. Section 4.2.1, Section 5 address the results of the 2022 field assessments and Section 6, and Section 7 address the proposed development and related impact and mitigations.	Not addressed: HDF-E and the downstream reach of HDF-D are described as intermittent and determined to be Key Hydrologic Features under the LSPP in the EIS. These features therefore require 30m vegetation protection zones. Furthermore, Section 9.1 of LSRCA’s Implementation Guidelines sets forth the provisions that must be met for watercourse alterations. In addition to other criteria, alterations may be permitted where no reasonable alternative exists, natural channel design principles are used, and where the ecological function of the watercourse and	Acknowledged, HDF-E and HDF-D downstream of Street A meet the criteria to be KHF. HDF-D downstream of Street A will be maintained within an enhanced and restored EP Block in the southern portion of the property. This will ensure the feature is provided with an appropriate buffer and is fully integrated as part of the overall NHS Strategy. As discussed with LSRCA staff, it is proposed that HDF-E will be realigned within the subject property with a tie into the existing SWD feature at the downstream

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						<p>riparian area are not affected and there is a net improvement to the system.</p> <p>Straightened drainage channels do not represent an improvement to the system and are not designed in accordance with natural channel design principles. HDF-D and HDF-E must be protected either in their current location with a 30m VPZ or relocated to provide a net ecological gain to the system. Any relocation of these features must incorporate natural channel design and be supported by a fluvial geomorphologist.</p>	<p>end of the property. The realigned block will allow for a natural channel design and restoration plantings within the riparian corridor. This channel design will be prepared by a fluvial geomorphologist as well as an ecological landscape design team.</p> <p>Upon agreement in principle to this approach, detailed design of the corridor will be conducted. Opportunities for habitat enhancement features will also be considered for inclusion.</p>
NH4	EIS	6.2	24	<p>Section 3.3.1.1 of LSRCA’s Ecological Offsetting policy states “Ecological offsetting will not be required for wetlands that are smaller than 0.5 ha or manmade features where it can be demonstrated to the satisfaction of the LSRCA, that the wetland or feature does not provide any of the following features or functions:</p> <ul style="list-style-type: none">• A groundwater hydrologic linkage to an adjacent key hydrologic or protected feature.• A component of or ecological linkage to an adjacent key natural heritage or protected feature.• A surface water hydrologic linkage (permanent or intermittent surface water connection) between the wetland and an adjacent key hydrologic or protected feature <p>Wetlands associated with drainage features D and E do not meet this criteria as they provide surface water and groundwater (D) connections to key natural heritage/hydrologic features. Removal of the wetlands associated with</p>	<p>This comment has been addressed in the revised Environmental Impact Study (Beacon 2023) which will be submitted for agency review and comment as part of the upcoming ZBA and Draft Plan submission. Section 4.3.3, Section 5 address the results of the 2022 field assessments and Section 6, and Section 7 address the proposed development and related impact and mitigations.</p>	<p>The riparian wetlands associated with HDF-D and HDF-E are components of these Key Hydrologic Features, and therefore these wetlands are also considered Key Hydrologic Features/Key Natural Heritage Features under the LSPP (as noted in the EIS). KHF/KNHF require 30m vegetation protection zones under the LSPP.</p> <p>In addition to demonstrating that the application conforms to applicable policies, to employ the Ecological Offsetting Policy, the applicant must detail the mitigation hierarchy (avoid, minimize, mitigate) demonstrating compensation for feature impacts is the only viable option for the development.</p> <p>If after following the mitigation hierarchy, it is demonstrated that compensation is the only viable option, an Ecological Offsetting Strategy will be required, providing the total area of woodland/wetland features including related VPZ that are proposed for removal and the total area of any locations</p>	<p>Acknowledged. The wetlands and wooded areas associated drainage features D and E are mapped as KNHF/KHF on Figure 3 and are addressed according to LSPP policies.</p> <p>With respect to VPZ, it is the intention of the proponent to design an EP Block that demonstrates an overall net gain to the NHS from a functional standpoint within the lands identified on Figure 4.</p> <p>The proposed plan has been modified to protect and maintain the identified KNHF/KHF such that it avoids these features and minimizes impacts. While it is proposed to realign HDF-E, currently straight golf course swale with a narrow band of wetland, the proposed realignment will allow for a naturalized channel morphology and restorative</p>

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				these watercourses will be subject to LSRCA's offsetting policy. This Policy can be accessed via the link: https://www.lsrca.on.ca/Pages/Ecological-Offsetting.aspx .		proposed for woodland/wetland replacement. The ecological offsetting strategy must be supported by a figure showing all proposed wetland and woodland removals and vegetation protection zones for KHF/KNHF (30 m as per the LSPP). A detailed ecological offsetting strategy and supporting restoration/compensation plan, including post-construction monitoring, will be required.	plantings within the newly created corridor. Figure 3 has been updated to illustrate the KNHF/ KHF and LSPP buffers and Figure 4 illustrates the on-site restoration proposed. A detailed ecological offsetting strategy will be prepared as the project moves forward to detailed design.
NH5	EIS	General		Provide an updated EIS with the results of the additional field work planned for 2022 (i.e. ELC, vegetation, breeding bird, and amphibian surveys).	This comment has been addressed in the revised Environmental Impact Study (Beacon 2023) which will be submitted for agency review and comment as part of the upcoming ZBA and Draft Plan submission. Section 3 – Stud Methodology and Section 4 – Existing Conditions speak to the field protocol and surveys completed in 2022.	Addressed.	Noted.
NH6	EIS	6.2, 7, Figure 3	23, 25	An assessment of the potential road connection to Line 5 through Greenbelt lands and the wetland area staked on June 8, 2022 should be included in the EIS at this time, rather than deferring to a later date, due to its proximity to/potential encroachment into key natural heritage/hydrologic features and associated buffers. This will facilitate a comprehensive assessment of cumulative natural heritage impacts.	This road connection is no longer proposed. The road connection has been shifted westward to avoid the staked wetland and Greenbelt lands, as depicted on Figure 4 of the EIS. Please refer to the revised Draft Plan of Subdivision (MGP 2023) for updated linework depicting the proposed development.	Acknowledged.	Noted.
NH7	EIS	4.9.1	20	Terrestrial crayfish chimneys were observed during the site visit on June 9, 2022 on the edge of the pool adjacent to the SWD community at the south end of the property and in the area between ELC community 1-9 and amphibian survey station 6. No minimum number of burrows to be considered Significant Wildlife Habitat nor mention of exclusion of	This comment has been addressed in the revised Environmental Impact Study (Beacon 2023) which will be submitted for agency review and comment as part of the upcoming ZBA and Draft Plan submission. Accordingly, Section 4.9 (Other Wildlife), Section 4.10 (SWH), Section 5, and Appendix E (SWH Screening) speak to wildlife and SWH.	The LSRCA is no longer able to comment on SWH on behalf of the Town of Bradford-West Gwillimbury. Please ensure municipal requirements are met.	Noted.

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				anthropogenic communities is given in the Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E. Please update the assessment of Significant Wildlife Habitat and mitigation.	The location of the most recent observations has been included in Figure 2.		
NH8	EIS	4.6	16	Section 4.6 states that one pair of Eastern Wood Pewee was recorded on the subject property while Table 6 in Section 4.9.1 states 2 pairs were recorded, as does Appendix D. Please revise and update Figure 2 with the location of the other pair record to ensure the proposed plan and mitigation provides protection to habitat. Note that no minimum number of pairs to be considered SWH is given in Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E. The presence of the species is considered Significant Wildlife Habitat. Please update the assessment of Significant Wildlife Habitat and mitigation.	See comment #43 above in relation to SWH and refer to Section 4.6 (Breeding Birds) and Appendix D (Breeding Bird List) for the results of the 2022 field surveys.	The LSRCA is no longer able to comment on SWH on behalf of the Town of Bradford-West Gwillimbury. Please ensure municipal requirements are met.	Noted.
NH9	EIS	4.9	19	As stated in Section 4.9 of the EIS, turtles may inhabit the ponds on the subject property, therefore a discussion of the potential for nesting and overwintering turtles should be included in Section 4.9.1 and Appendix E.	See comment #43 above in relation to SWH and refer to Section 4.5 (Reptiles and Amphibians) for the results of the 2022 field surveys.	The LSRCA is no longer able to comment on SWH on behalf of the Town of Bradford-West Gwillimbury. Please ensure municipal requirements are met.	Noted.
NH10	EIS	4.3, Figure 2	13	Please provide ELC vegetation community types for the area extending to the west and north of the staked woodland shown on Figure 2 (part of which was identified as wetland and staked during the site visit with LSRCA on June 8, 2022) and provide descriptions of the communities.	This comment has been addressed in the revised Environmental Impact Study (Beacon 2023) which will be submitted for agency review and comment as part of the upcoming ZBA and Draft Plan submission. Results of the 2022 field surveys are provided in Section 4.3 (Vegetation Communities), Section 4.4 (Flora), Appendix C (Vascular Plant List) and are mapped in Figure 2 – Existing Conditions.	Addressed.	Noted.
NH11	EIS	4.8		Clarify if the CUW community was investigated for potential SAR bat habitat (i.e. presence of cavity trees) to ensure conformity with the <i>Endangered Species Act</i> .	Addressed, the revised Environmental Impact Study (Beacon 2023) will be provided for agency review and comment. A snag survey or habitat assessment will likely be required to	The LSRCA is no longer able to comment on the ESA on behalf of the Town of Bradford-West Gwillimbury. Please ensure municipal requirements are met.	Noted. A bat habitat assessment will be conducted in the wooded communities proposed for removal in leaf-off conditions in fall 2024.

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					gain a better understanding of the individual snag tree presence/density on the property, with the potential requirement for acoustic monitoring. Consultation with MECP will be undertaken to confirm how the application should proceed to ensure conformity with the ESA.		MECP will be consulted to ensure the requirements of the ESA are addressed/
NH12	EIS	4.9	18	For information only: note that Red-headed Woodpecker is now listed as Endangered in Ontario	Acknowledged.		Noted.
NH13	EIS	6.2	23	Nest searches for vegetation removal during the entire active breeding season (April 1 to August 31) are generally not supported by Environment and Climate Change Canada. They may be appropriate if undertaken by skilled and experienced observers (as noted in the EIS), involve only a few potential nesting spots, and are in simple habitats. They must be completed within 48 hrs prior to vegetation removal. Refer to guidance from Environment and Climate Change Canada located here: Guidelines to reduce risk to migratory birds - Canada.ca	Acknowledged.		Noted.
NH14	EIS	Figure 5				New comment: The Potential Compensation Area overlaps with HDF-E and the required VPZ for this feature and the SWD4-1 feature. Please revise.	The revised figures show the proposed realignment of HDF-E which will occur under natural channel design. A VPZ of 30 m has been applied to the MAM2-10 wetland associated with this drainage feature and will be compensated for on site to the extent possible, with the deficit being addressed through the EOS.
NH15	EIS	6.3	45			New comment: A detailed water balance assessment will be required with greater ecological interpretation and assessment of impacts to KHF/KNHF. This should include timing of inputs to features and potential impacts to vegetation community	A water balance assessment has been submitted.


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						composition and wildlife habitat. Mitigation of any impacts will be required to ensure there will be no negative impacts to the ecological and hydrological functions provided by these features.	
NH16	EIS	7.1	47			New comment: The Environmental Protection Area is to be free of any infrastructure. The stormwater outlet must be located outside of this zone.	The outlet headwall will be located outside of the setback to the watercourse, all natural heritage features, and the Erosion Hazard Limit in accordance with Section 6.4.2 of LSRCA’s Technical Guidelines for Stormwater Management Submissions. An outfall swale from the headwall to the North Canal is anticipated to ensure the flows are conveyed safely to the outlet without causing erosion between the headwall and the North Canal. The outfall swale will be restored with vegetation and will not contain hard infrastructure. At the detailed design stage, the outfall swale will be reviewed for opportunities to minimize the ground disturbance through the Environmental Protection lands (SCS 2024)
NH17	EIS	7.2	49			New comment: A 30m VPZ is required for the staked wetland units (MAM2-10 and SWD4-1) outside of the Greenbelt as well as these are KHF/KNHF under the LSPP. Parks and SWM facilities do not count as VPZ. The VPZ must be planted with natural, self-sustaining vegetation in appropriate densities to function as intended and are not to include infrastructure or accessory uses.	The proposed development plan has been revised to reflect these comments. The boundaries of the Park and SWM have been adjusted to avoid KNHF/KHF to the extent possible. A larger EP Block has been incorporated into the plan which will be subject to ecological landscape design and native species plantings. In areas where a lesser buffer is proposed, the buffer differential will be included in EOS calcs, and restoration will be

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							proposed on site offering to the extent possible. Deficit will be addressed through cash-in-lieu or offsite planting opportunities.
NH18	EIS	Table 9	53			New comment: In Table 9: Natural Heritage Policy Conformity, MAM2-10 and SWD4-1 associated with HDF-E are recognized as KHF/KNHF in the table, but only SWD4-1 is identified as being retained. No further mention is given to MAM2-10. Please describe how the development conforms to LSPP policy for all KHF/KNHF. The table also includes an entry for O.Reg. 179/06 but does not address how the proposal to channelize intermittent drainage features meets the provisions for watercourse alterations under LSRCA regulations. Please revise.	As noted, the MAM2-10 in association with HDF-E is being relocated southward and will undergo channel naturalization with the geomorphic and landscaping architecture teams. The MAM2-10 along with a 30 m VPZ have been considered in the compensation calculations which are being recreated on site to the extent possible, with the remainder to be addressed through the EOS.
NH20	EIS	7.2	49			New comment: Expanding existing wetlands by up to 1.7 ha will fall short of 3:1 replacement requirements under LSRCA's EOP for the proposed removal of 1.51 ha of wetland. See comment NH4 above.	On site restoration is being maximized to the extent possible and is understood to be the preferred option, however the deficit in required compensation will be addressed through the preparation of an EOS.
NH21	EIS	7.1	48			New comment: Under Removal of Wetland and Woodland Communities, it is not clear how many hectares of wetland are proposed for removal as the two paragraphs give different amounts. Please clarify. The total woodland removal in this section is given as 2.21ha (1.7ha CUW/CUP and 0.51ha of ELC forest communities), but the total for those on Figure 6 add up to 2.25ha. Please clarify.	The revised wetland removal amounts are depicted in the legend on Figure 5 and are cross-referenced the body of the report (Section 7.1).
NH22	EIS	Figure 5				New comment: For clarity, please provide a figure showing vegetation protection zones to	Figure 3 has been amended to show this, which is separate from

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						key hydrologic and key natural heritage features separate from a figure showing proposed vegetation removals (including VPZ) and compensation.	graphics depicting removals and compensation.
NH23	EIS	Section 5	39			New comment: The first paragraph of this section should include natural heritage components under the LSPP. Please revise.	Adjustments made to text
NH24	EIS	Table 9	53			New comment: Reference should be to LSRCA, not TRCA.	Adjustments made to text
NH25	General					New comment: Please explore opportunities for greater on-site restoration than is proposed.	<p>The proposed plan has been revised to avoid KNHF/KHHF.</p> <p>Further, areas south of the SWM pond block have been freed up for restoration purposes which involves the retention of features in that area along with wetland creation in the areas that are currently meadow or anthropogenic golf course. This will increase the contiguous feature area of the EP and connect to the existing communities within the Greenbelt.</p> <p>Additional restoration areas are shown on Figure 5 and include the perimeter of the SWM pond and the realignment of HDF-E which includes areas slated for restoration to the north and south of the channel alignment, which will undergo a naturalized and meandering channel design.</p>

#	Comment	Response By	Response
Alectra Utilities Mahsa Javadi, Engineering Clerk <i>January 3rd, 2024</i>			
139.	Please be advised 23 Brownlee Drive, 2820, 2824 and 2848 Line 5, are not under Alectra Utilities Service territory.	Owner	Acknowledged.
Bell Canada Juan Corvalan, Senior Manager – Municipal Liaison <i>February 1st, 2024</i>			
Conditions of Approval			
140.	The Owner acknowledges and agrees to convey any easement(s) as deemed necessary by Bell Canada to service this new development. The Owner further agrees and acknowledges to convey such easements at no cost to Bell Canada.	Owner	Acknowledged.
141.	The Owner agrees that should any conflict arise with existing Bell Canada facilities where a current and valid easement exists within the subject area, the Owner shall be responsible for the relocation of any such facilities or easements at their own cost.	Owner	Acknowledged.
Canada Post Melissa Campeau, Delivery Services Officer <i>February 14th, 2024</i>			
142.	The owner/developer will consult with Canada Post to determine suitable permanent locations for the placement of Community Mailboxes and to indicate these locations on appropriate servicing plans.	Owner	Acknowledged.
143.	The Builder/Owner/Developer will confirm to Canada Post that the final secured permanent locations for the Community Mailboxes will not be in conflict with any other utility; including hydro transformers, bell pedestals, cable pedestals, flush to grade communication vaults, landscaping enhancements (tree planting) and bus pads.	Owner	Acknowledged.
144.	The owner/developer will install concrete pads at each of the Community Mailbox locations as well as any required walkways across the boulevard and any required curb depressions for wheelchair access as per Canada Post’s concrete pad specification drawings.	Owner	Acknowledged.
145.	The owner/developer will agree to prepare and maintain an area of compacted gravel to Canada Post’s specifications to serve as a temporary Community Mailbox location. This location will be in a safe area away from construction activity in order that Community Mailboxes may be installed to service addresses that have occupied prior to the pouring of the permanent mailbox pads. This area will be required to be prepared a minimum of 30 days prior to the date of first occupancy.	Owner	Acknowledged.
146.	The owner/developer will communicate to Canada Post (Melissa Campeau – Delivery Planning) the excavation date for the first foundation (or first phase) as well as the expected date of first occupancy a minimum of 1 year prior to occupancy.	Owner	Acknowledged.
147.	The owner/developer agrees to include in all offers of purchase and sale a statement, which advises the prospective new home purchaser/tenants that mail delivery will be from a designated Community Mailbox, and to include the exact locations (list of lot #s) of each of these Community Mailbox locations; and further, advise any affected homeowners/tenants of any established easements granted to Canada Post.	Owner	Acknowledged.
Further Requests			
148.	Enhanced Community Mailbox Sites with roof structures will require additional documentation as per Canada Post Policy	Owner	Acknowledged.

#	Comment	Response By	Response
149.	There will be no more than one mail delivery point to each unique address assigned by the Municipality	Owner	Acknowledged.
150.	Any existing postal coding may not apply, the owner/developer should contact Canada Post to verify postal codes for the project	Owner	Acknowledged.
151.	The complete guide to Canada Post’s Delivery Standards can be found at: https://www.canadapost.ca/cpo/mc/assets/pdf/business/standardsmanual_en.pdf	Owner	Acknowledged.
Enbridge Willie Cornelio, Sr. Analyst Municipal Planning <i>December 28th, 2023</i>			
152.	Enbridge Gas does not object to the proposed application(s) however, we reserve the right to amend or remove development conditions. This response does not constitute a pipe locate, clearance for construction or availability of gas.	Owner	Acknowledged.
Hydro One Dennis De Rango, Specialized Services Team Lead <i>March 21st, 2024</i>			
153.	We have reviewed the documents concerning the noted Plan and have no comments or concerns at this time.	Owner	Acknowledged.
Simcoe County District School Board Kristen Bartmann, Planner <i>February 15th, 2024</i>			
154.	<p>There is an outstanding Official Plan Amendment application which seeks to re-designate the subject lands from “Rural” to “Residential” and incorporate the lands into the “Bradford Urban Area”. It is Simcoe County District School Board (SCDSB) staff’s understanding that the Zoning Bylaw Amendment and Draft Plan of Subdivision have not been deemed complete, as Town staff are waiting on an updated Planning Justification Report (PJR).</p> <p>The Simcoe County District School Board provided comments on the pre-consultation in February 2022, noting that a school site would be required on the subject lands and that SCDSB staff were reviewing if the school needs would be within the elementary or secondary school panel. Further comments were provided by the SCDSB in June 2022 which reiterated the growth pressures in the Town of Bradford West Gwillimbury and requested that the applicant consider the adequacy of school sites in the Town in a revised Planning Justification Report. At this time, an updated Planning Justification Report has not been provided.</p> <p>Although Planning Department staff are supportive and understand the critical need for additional residential housing forms, the board is concerned about the impact of such development proposals on the ability to provide elementary and secondary pupil accommodation in the Town of Bradford West Gwillimbury. The board’s facility requirements are impacted by greenfield development, as well as residential intensification and infill within the settlement areas which increases enrolment in local schools.</p> <p>Currently, the six existing public elementary schools in the community are over capacity and projected to remain over capacity with increasing reliance on portable accommodation. The existing public elementary schools in the Town of Bradford West Gwillimbury are currently at 108% utilization overall.</p>	Owner	A 2.0 hectares school block has been provided which is consistent with the potential school site options provided by Simcoe County District School Board.

#	Comment	Response By	Response
	<p>At this time there is no comprehensive secondary plan for this area of the Town of Bradford West Gwillimbury. SCDSB planning staff are concerned that without a comprehensive secondary plan, additional development will move forward before adequate school sites have been designated. Given the capacity of the existing schools and the projected growth within the Town of Bradford West Gwillimbury, the Simcoe County District School Board is reiterating the need for a new school site to be designated within this subdivision; specifically, a 5-6 acre elementary school site is required. SCDSB staff request a coordinated effort with the Town on selecting the most appropriate location(s) for future school site(s) to accommodate the projected growth on a comprehensive level.</p> <p>Attached to this letter are three potential school site options within this proposed subdivision. It should be noted that Option 3, abutting the proposed park Block 508, would require Street 'Q' to be revised to no longer terminate as a cul de sac but to instead intersect with existing Brownlee Drive. This would create appropriate frontages and access to the proposed Option 3 school site. SCDSB respectfully request a meeting with Town of Bradford West Gwillimbury planning staff and the applicant to review and discuss the potential school site options.</p> <p>Simcoe County District School Board planning staff also note that a condition of draft plan approval required by the board may include the requirement to rezone the proposed school block to an Institutional Zone with site-specific provisions. Such amendments may include, but are not limited to, the required bicycle parking being satisfied by the provision of bicycle or scooter parking and the adjustment of required planting strips.</p> <p>Planning Department staff will continue to assess ongoing growth pressures in the Town of Bradford West Gwillimbury, as they relate to future school sites. Once a potential school site that satisfies the Simcoe County District School Board has been designated within this subdivision, draft plan conditions will be provided. Should you require additional information, please do not hesitate to contact this office.</p> 		
Southlake Regional Health Centre Nathan Robinson, Director <i>December 28th, 2023</i>			
155.	<p>Southlake Regional Health Centre understands the impact of provincial and regional planning requirements on local communities, in particular, the provincial Places to Grow strategy. In this context, continued residential development is not unexpected.</p> <p>It is important for Council to recognize however, that provincial growth policies do not provide for the necessary capital investment to expand hospital infrastructure to meet the health care needs of new residents.</p>	Owner	Acknowledged.

#	Comment	Response By	Response
	At Southlake we are doing our best to find new and innovative ways to better serve our growing communities and we will continue to do so. Southlake will require Council's continuing support with respect to supporting local share fundraising and to supporting our efforts to secure necessary funding approvals from the provincial government to help meet the needs of our growing population.		

#	Comment	Response By	Response
Public Meeting – June 11, 2024			
<i>June 11th, 2024</i>			
Bob Adam			
1.	Were the previous comments addressed in this latest proposal?	Owner/MGP	The proposed development has been revised to address the comments received. Refer to planning opinion addendum letter for list of changes.
2.	Does the current Official Plan account for the required growth and do we have enough settlement area to accommodate this growth, specifically do we need the Bradford Highlands lands.	MGP	Refer to response to comment #83. It continues to be our opinion that there is additional land required to accommodate growth to 2031.
Candice Smith			
3.	Hydrogeological Report – Section 4.4 The report indicated that the surrounding properties on Brownlee do not have private groundwater wells. This is incorrect as her property has one and other properties have similar conditions, as well as some have septic beds	WSP	The report does not include a Section 4.4. The existing private supply wells in the vicinity of the site were identified as part of the review of the MECP water well database.
4.	I have concerns about the impacts to the wells and the aquifers. How can the integrity of these wells and aquifers be protected during and after construction.	WSP	The potential effects of development on private wells in the vicinity will be assessed as part of the on-going hydrogeological evaluation, and will include development of a monitoring and mitigation plan.
5.	Will the homes on private services eventually be offered options to connect to full municipal services?	Owner/ SCS	This is a request should be made to the Town of Bradford West Gwillimbury, as they would be responsible for this.
6.	In regards to phosphorous runoff, the report indicates that runoff will increase by 150% post-development and into the SWM system, which we believe is a concern.	SCS	The phosphorus budget has been completed in accordance with the Lake Simcoe Protection Plan requirements and LSRCA’s phosphorus offsetting policy. The stormwater management plan, including the phosphorus budget will be reviewed by LSRCA.
Wanda LeBanc			
7.	The density that is being proposed is overwhelming and these lands should not be able to accommodate 1,000 homes.	MGP	The proposed density for the Subject Lands represents a compact, well-planned built form that includes an appropriate range and mix of housing to meet both current and future residential needs. The site’s design integrates essential amenities, including a school, parks, and stormwater management, supporting a vibrant community. Additionally, the site is well-positioned to accommodate this level of development due to the availability of servicing infrastructure and an established road network, which can support increased residential density without compromising functionality or accessibility. This makes the proposed density suitable and sustainable for the area.
8.	There are other areas in the Town that can accommodate the required growth within the settlement area. One example is the area north of Line 8.	MGP	Refer to response to comment #83. It continues to be our opinion that there is additional land required to accommodate growth to 2031.
9.	The amount of development will bring in renters that will ruin the area and there will be many waste and recycling bins littering the street.	MGP	See response to the above comment #7.
10.	There will be a lack of parking for the homes, especially the townhomes with only 1 per dwelling, as well as lack of on-street parking.	BA Group	It is anticipated that all residential lots within the site will be served by 2 off-street parking spaces (1 space in the driveway and 1 space in the garage). In addition, a conceptual on-street parking allocation plan has been prepared to demonstrate the estimated on-street parking supply. It has been estimated that an on-street parking supply of 445 spaces will be allocated for the site, which results in an on-street parking rate of approximately 0.46 parking spaces per unit. Effectively, the proposed development is proposing

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			an overall parking rate of approximately 2.46 parking spaces per unit, including residents and visitors. This proposed supply meets and exceeds the minimum vehicle parking requirements of 2 parking spaces per unit for single-detached homes, semi-detached homes, and townhouses as outlined in Town of Bradford West Gwillimbury Zoning By-law 2010-050. Therefore, the proposed parking supply for the site is considered appropriate and will meet the demand needs anticipated for the site.
11.	In the review and analysis of this development, there was no discussion on the impact to Line 5 or Line 6 from a traffic perspective. These roadways are narrow and already are full.	BA Group	<p>The traffic impacts of the proposed development have been analyzed for intersections along Line 5 and Line 6 in both prior submissions as well as within this updated letter.</p> <p>It is noted that under existing conditions, study area intersections along Line 5 and Line 6 operate with minimal delays and at significantly below their theoretical capacity. After accounting for background growth as well as traffic generated by the proposed development, all study area intersections along Line 5 and Line 6 continue to operate with acceptable delays and at under their theoretical capacity for the 2026, 2031, and 2036 horizon years.</p>
12.	There are townhouses that would be 3 storeys and dwarf the estate dwellings along Brownlee Drive.	MGP	There are no townhouses proposed adjacent to the existing estate residential dwellings.
13.	This development will bring property values down.	MGP	Property values are not an urban planning issue. Land use planning focuses on land use, infrastructure, and community needs to support sustainable growth and public welfare, rather than on influencing market-driven property valuation.
14.	Has there been an impact study on the wells in this neighbourhood?	WSP	The potential effects of development on private wells in the vicinity will be assessed as part of the on-going hydrogeological evaluation, and will include development of a monitoring and mitigation plan.
15.	There hasn't been any studies on the drainage impacts for properties along Line 6.	SCS	The revised FSSR identifies the runoff from properties along Line 6 that enter the property. The runoff will be accommodated for in the proposed storm drainage system.
16.	Brownlee Drive is in disrepair. Is there an option to deal with upgrades through this development?	Owner	This is a request should be made to the Town of Bradford West Gwillimbury, as they would be responsible for this.
17.	Suggest that the applicant implement a multi-use trail adjacent to the homes on Brownlee as well as larger homes along Line 6 and Brownlee to help provide relief/transition	Owner/MGP	The Draft Plan has been revised to incorporate trails/walkways adjacent to existing estate residential development in certain areas where appropriate to provide a larger separation and transition/buffer.
18.	Is there an option to include more sustainable development, affordable housing or age-friendly/accessible housing. An example would be bungalows?	Owner	A variety of housing types are proposed throughout the development which would cater to a range of age groups and provide a range of housing prices.
Mary Thomas			
19.	A vibration assessment was not submitted as part of this application. How will the development impact the infrastructure?	Owner	A vibration assessment is not required as part of the subdivision process. This work is typically completed prior to construction
20.	There are multiple areas in the draft plan that do not have a description such as the Future Development blocks. There should be a plan for all the lands.	Owner/MGP	Future development blocks are labelled as such due to requiring additional lands to be able to develop these specific lands.

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21.	Page 54-55 of the Functional Servicing Report shows the construction entrance along Line 6 and the rest of the property being fenced in. Why is the primary access in an area where there is more traffic. It should be redirected to Line 5 or Inverness where there is less impact to existing residents.	SCS	Construction access will be confirmed at the detailed design stage and subject to review and approval by the Town at that time.
22.	There is nothing in this development proposed for educational/institutional use, especially given the school board has asked for a school.	Owner	An elementary school block has been added to the draft plan in response to feedback received.
23.	There is no commercial space proposed within this development and with this level of density, there needs to be something for the existing and future community.	Owner	A commercial needs assessment has been prepared and concluded that there are no suitable areas for commercial use within the site that would be viable.
24.	There is no park within this development.	MGP	There continues to be two parks proposed within the development. In addition, walkways/trails have been added throughout the draft plan in order enhance connections.
Franco Peleski			
25.	The existing clubhouse area should be a park or at the end of the cul-de-sac	Owner/MGP	Sufficient parkland, as required by the Planning Act, has been provided, which are through two large parks with adjoining walkways/trails. These open space areas are central to the development and we believe are appropriate to support the existing and future residents.
26.	I would suggest that the applicant put a 20m buffer adjacent to lots on Brownlee Drive.	Owner/MGP	The Draft Plan has been revised to incorporate trails/walkways adjacent to existing estate residential development in certain areas where appropriate to provide a larger separation and transition/buffer.
27.	Who is going to pay for the pumping station within the development. This will cost \$8-9 million.	SCS	No longer applicable, the revised FSSR has been prepared to eliminate the need for a sanitary pumping station.
28.	There should be no townhouses adjacent to Brownlee Drive and needs to be protected.	MGP	There are no townhouses proposed adjacent to the existing estate residential dwellings.
Nancy			
29.	There is enough negativity around this plan that the applicant should back to the drawing board.	Owner/MGP	We believe that the changes made to the proposed development appropriately addresses the input we have received.
Lorraine Mantel			
30.	Is the developer willing to provide accessible and/or affordable homes? Providing an apartment building within this development would be a good addition.	Owner/MGP	A variety of housing types are proposed throughout the development which would cater to a range of age groups and provide a range of housing prices.
31.	Is a 28' lot realistic for people to enjoy with large enough backyards.	Owner/MGP	Generally, the minimum lot depths in this plan provide 30 metres (100 feet), which is a typical lot depth for contemporary lots. The plan is also proposing lots greater than 30 metres in depth where it can be accommodated. This will allow for sufficient space for private open space in the backyards. These lot depths are also consistent with what has been previous built immediately to the east.
32.	Traffic roundabouts would help internal to the subdivision (or other traffic calming measures).	BA Group	As requested by Town staff, BA Group has reviewed the potential of providing a traffic roundabout at the proposed Street B / Street A intersection within the site. Based on our review, it was determined that a roundabout could not be accommodated due to the anticipated residential lot patterns at the proposed intersection. Given that it is not desirable to have direct driveway access to / from a roundabout intersection within 10 metres, a roundabout cannot be accommodated at the proposed Street B /

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			<p>Street A intersection. Providing a roundabout at the proposed intersection would result in driveways accessing the roundabout directly which is an unfavourable transportation condition in terms of safety and operations. The proposed Street B / Street A intersection is located near the potential proposed elementary school and park blocks. A roundabout could potentially create some challenges for pedestrians to navigate safely through the intersection. Given that roundabouts typically require much larger area than a conventional intersection, pedestrians will have to loop around the roundabout and increase their walking distance to cross the intersection, making it less efficient and accessible. Therefore, it is recommended that the proposed Street B / Street A intersection operates as a traditional all-way stop-controlled intersection.</p> <p>Notwithstanding, other traffic calming measures have been proposed throughout the development, particularly along the proposed Street A corridor to reduce vehicle speeds. These traffic calming measures include raised mid-block pedestrian crossings, raised intersections crossing where high pedestrian demand is anticipated, speed humps, all-way stop controlled intersections, and curb extensions / bump-outs to accommodate on-street lay-by parking and reduce the width of the road.</p>
33.	What is the starting point for the single detached homes? How will seniors/first time home buyers enter this market?	Owner	It is too early in the process to determine price points. There is a array of housing options available in the plan which will provide options for first time home buyers and seniors.
James Gregory			
34.	I am frustrated with the road allowance adjacent to his estate home (2840 Line 5) as there will be ~5,000 cars travelling past his home every day and all the problems that come along with it (noise, light, salt, etc...)	Owner/BA Group/MGP	Traffic impacts of the proposed development on intersections along Line 5 have been assessed as part of prior submissions and as part of this updated letter. The nearby intersection of Line 5 / Canal Road is projected to operate well after accounting for background growth and site-generated traffic. Average delays for the 2036 horizon year are expected to increase 3-7 seconds over existing delays for eastbound traffic turning onto Canal Road.
35.	Line 5 already has significant traffic problems and this will make it worse.	BA Group	<p>The traffic impacts of the proposed development have been analyzed for intersections along Line 5 in both prior submissions as well as within this updated letter.</p> <p>It is noted that under existing conditions, study area intersections along Line 5 operate with minimal delays and at significantly below their theoretical capacity. After accounting for background growth as well as traffic generated by the proposed development, all study area intersections along Line 5 continue to operate with acceptable delays and at under their theoretical capacity for the 2026, 2031, and 2036 horizon years.</p>
36.	The development, as proposed, will negatively impact his property value and enjoyable use.	MGP	Property values are not an urban planning issue. Land use planning focuses on land use, infrastructure, and community needs to support sustainable

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			growth and public welfare, rather than on influencing market-driven property valuation.
37.	Would appreciate a follow up with the developer	Owner	There was small group of area residents that have had discussions with the developer.
Mauro DiGiovanni			
38.	Do we have the growth numbers from the infill and proposed development within the urban area to show that expansion outside the boundary is needed? Especially with the permission of ADUs.	MGP	MGP has made multiple submissions on the lands needs assessment to 2031, which BHJV has an active appeal with. Due to a multitude of reasons, there is insufficient land within the urban boundary to support growth to 2031.
Jeff Brice			
39.	How will safety on Brownlee Drive be maintained during construction and after construction.	Owner	There will be a Construction Management Plan as part of the detailed design process that will be enforced by the Town once approved.
Virginia & Paul			
40.	Think about introduction of buffers within the development and additional green space.	Owner	The Draft Plan has been revised to incorporate trails/walkways adjacent to existing estate residential development in certain areas where appropriate to provide a larger separation and transition/buffer.
Steph Sinclair			
41.	Commercial space should be mandatory and placed at the entrance of Line 6.	Owner	A commercial needs assessment has been prepared and concluded that there are no suitable areas for commercial use within the site that would be viable.
42.	There are no buffers and there is a lack of connectivity within the proposed plan.	Owner/MGP	The Draft Plan has been revised to incorporate trails/walkways adjacent to existing estate residential development in certain areas where appropriate to provide a larger separation and transition/buffer.
43.	More thorough and proper public participation could have solved some of these issues.	Owner/MGP	Numerous opportunities for public input on the development of this site has been undertaken, more than the statutory requirement.
Alex Pegus			
44.	Environmental Impact Study is false and a peer review should be considered.	Beacon	The EIS was prepared by a team of qualified technical experts in terrestrial and aquatic ecology and species at risk from Beacon Environmental. Beacon Environmental has provided high quality expertise in natural heritage consulting since 2005. Seasonally appropriate field surveys were conducted in accordance with accepted protocols based on an agreed upon Terms of Reference with the Lake Simcoe Region Conservation Authority. Natural features were confirmed in the field with LSRCA. Report findings are reflective of the studies conducted.
Mr. Murphy			
45.	There are not enough hospitals or schools.	Owner/MGP	An elementary school block has been added to the Draft Plan.
Steve Ferra			
46.	There are many homes backing onto my property and there shouldn't be that many.	Owner	The Draft Plan has been revised to incorporate trails/walkways adjacent to existing estate residential development in certain areas where appropriate to provide a larger separation and transition/buffer.

