

Attachment C: Technical Comments

28TPL2024308/ZNPL2024307 – Woodway Trails Second Submission Comments

Student Transportation Services Brant Haldimand Norfolk (STSHBN):

1. Overview on page 14 does not appear to show if/ where sidewalks will be present. To ensure safe pedestrian travel is possible in the community, STSBHN would like to see the inclusion of sidewalks on all road segments
2. The inclusion of green space in the development is appreciated. These spaces, when connected by sidewalks, allow for ideal bus stop locations (helping ensure no residence are inconvenienced by having the bus stop placed at or by their home).

Mississaugas of the Credit First Nations (MCFN):

The Mississaugas of the Credit First Nation (MCFN) are the Treaty Holders of the land on which the project will take place – specifically, the Between the Lakes Treaty No. 3, of 1792. The MCFN holds Indigenous and Treaty Rights specific to the project location and its environs, which may be adversely impacted by it. The Department of Consultation and Accommodation (DOCA) is designated by the MCFN to handle consultation matters on its behalf.

The DOCA consultation team has reviewed the project-related correspondence identified above, in addition to any associated documentation. The following DOCA Units have completed a review and their questions and comments have been included below.

Archaeology Unit

Primary Reviewer: MCFN DOCA, Archaeological Unit

Questions and Comments: In Review. Comments Pending.

Environment Unit

Questions and Comments:

1. Ecological conditions can shift significantly in 15+ years (specifically in terms of climate change and invasive species). Was this considered as part of the EIS Conformance Assessment?
2. I believe that without a full EIS update, there is a risk that the recommendations no longer reflect current site conditions, especially regarding woodland health, species at risk, or hydrology.
3. Were cumulative ecological impacts considered in the original reports?
4. Will there be any monitoring to ensure the success of the rehabilitated lands?
5. Will the invasive species be removed?

6. It looks like the vegetation is associated with the Lynn River floodplain, are these significant natural heritage features? Are there any provincially significant wetlands or significant woodlands?
7. As part of the Lynn River corridor, the woodlands are still significant as they form part of the movement corridor and could also serve as a breeding site for birds, how are they considered in the assessment?

Until the questions, concerns, and/or interests identified in this letter have been satisfactorily addressed, the project must not receive approval or proceed with any ground-altering activities. We request a response to our feedback within two to three weeks' time. DOCA expects to be notified of any and all future project updates and/or changes.

Long Point Region Conservation Authority (LPRCA):

1. POST 3 (major-system bypass): Please confirm the overland flow routing, depth/velocity, and capacity to safely reach the outlet without adverse impact.

Canada Post:

Service type and location

1. Canada Post will provide mail delivery service to this development through centralized Community Mail Boxes (CMBs) unless;
2. If the development includes plans for (a) multi-unit building(s) with a common indoor entrance of 3 or more units, the developer must supply, install and maintain the mail delivery equipment within these buildings to Canada Post's specifications.

Municipal requirements

1. Please update our office if the project description changes so that we may determine the impact (if any).
2. Should this development application be approved, please provide notification of the new civic addresses as soon as possible.

Developer timeline and installation

1. Please provide Canada Post with the excavation date for the first foundation/first phase as well as the date development work is scheduled to begin. Finally, please provide the expected installation date(s) for the CMB(s).

Please see Appendix A below for any additional requirements for this developer should Canada Post need to install a Community Mailbox.

Appendix A

Additional Developer Requirements:

1. The developer will consult with Canada Post to determine suitable permanent locations for the Community Mail Boxes. The developer will then indicate these locations on the appropriate servicing plans.

2. The developer agrees, prior to offering any units for sale/rent, to display a map on the wall of the sales office in a place readily accessible to potential owners/renters that indicates the location of all Community Mail Boxes within the development, as approved by Canada Post.
3. The developer agrees to include in all offers of purchase/rental a statement which advises the purchaser/renter that mail will be delivered via Community Mail Box. The developer also agrees to note the locations of all Community Mail Boxes within the development, and to notify affected owners/renters of any established easements granted to Canada Post to permit access to the Community Mail Box.
4. The developer will provide a suitable and safe temporary site for a Community Mail Box until curbs, sidewalks and final grading are completed at the permanent Community Mail Box locations. Canada Post will provide mail delivery to new residents/tenants as soon as the homes/businesses are occupied.
5. The developer agrees to provide the following for each Community Mail Box site and to include these requirements on the appropriate servicing plans:
 - Any required walkway across the boulevard, per municipal standards
 - Any required curb depressions for wheelchair access, with an opening of at least two to three metres (consult Canada Post for detailed specifications)
 - A Community Mailbox concrete base pad per Canada Post specifications.

Public Transit (Ride Norfolk):

The Transit Master Plan doesn't identify specific locations of stops. It does recommend two routes within Simcoe however, this development is not included in the recommended route.

However, with the frequency of use at the existing stops at Donly Drive South and Brookfield Lane there have been several requests from the public for a stop further into this development.

Two suggested stop locations. These stops could be offered as a 'flex-stop' meaning the bus could be requested here for pick up and drop offs but would not be otherwise on the regular fixed route.

1. Trillium and Hackberry Lane - currently a 10 minute walk from the closest existing stop
2. Woodway Trail and Block 3

Norfolk GIS:

Please contact NorfolkGIS for new civic addresses when building.

You can apply for a new civic address [here](#). If a green sign is required in order to issue you an address (generally anywhere outside of an urban area) you will have to call

Norfolk County Customer Service after applying to make payment before the address is issued (519-426-5870 or 226-NORFOLK). If you would like to apply for a new Civic Address because you are planning to build on a vacant parcel of land, this is dealt with as part of the building permit process. The building inspector can provide you with a copy of a Civic Address Request Form or it can be downloaded [here](#). On the form there are several areas that need to be filled out with information, and a sketch showing the lot layout of the property for which the Civic Address is being requested. A sample sketch will be included with the form.

Enbridge Gas:

Enbridge Gas does not object to the proposed application(s), however, we reserve the right to amend or remove development conditions.

Please always call before you dig, see web link for additional details: <https://www.enbridgegas.com/safety/digging-safety-for-contractors>

Thank you for your correspondence with regards to draft plan of approval for the above noted project.

It is Enbridge Gas Inc.'s request that prior to registration of the plan, the Owner shall make satisfactory arrangements with Enbridge Gas Inc. (Enbridge Gas) to provide the necessary easements and/or agreements required by Enbridge Gas for the provision of local gas service for this project. Once registered, the owner shall provide these easements to Enbridge Gas at no cost, in a form agreeable and satisfactory to Enbridge Gas.

Norfolk Fire:

The proposed use of the existing stormwater management pond as emergency access is troubling, as this is a very convoluted way and cannot be cleared/maintained in a manner that would ensure emergency access, especially in the winter and during the spring thaw. Is this walkway paved, is constructed in a way that would support the weight and width of emergency apparatus, and is there means to clear this path? Are there plans to make this a permanent emergency access or just during construction?

The Fire Department is not overly concerned about the emergency access through Oakwood Cemetery.

Source Water Protection:

The above noted property is not located within a Wellhead Protection Area or Intake Protection Zone. As such, the Long Point Region Source Protection Plan will not apply to this application.

Parks, Recreation and Culture:

Forestry:

The submission has addressed the Significant Woodland features present by implementing an appropriate buffer from development, and further by dedicating the lands adjacent to the buffer as parkland. It is indicated that the buffer and the Significant Woodland features are to be dedicated to the County as Open Space and Hazard Land

(blocks 2, 4, and 5). I support this approach to the protection of the Natural Heritage Features on this site.

The EIS Conformance Report confirms that the submission is in keeping with the recommendations made from the original EIS (2008 and 2010), and the mitigation recommendations should be incorporated into the draft plan agreement where appropriate.

Parks:

Considering the "Trails" design theme for the subdivision, the proposed park block in the northwest supports the interconnectivity of the area and provide adequate space for future activation, assuming it is 5%. The cemetery buffers are not considered park land, as the grade change is significant and can not be used for trail or recreation.

Future trail connection (emergency egress point) on the north east of phase 1 provides adequate community access to Oakwood cemetery, and a future connection on the north west of phase through to the southwest corner of Oakwood cemetery is complementary. No mid-block connection on the north boundary is required or desired.

The maintenance access paths surrounding the Block 8 storm pond can also be utilized as walking path connections for the community, and could work as a hub connecting the Lynn Valley trail in the future. It would be beneficial for the access points to the SWM block not to be fenced; existing P gate standard recommended for future phases. The north residential boundary requires privacy fencing to the same standard as earlier phases.

The remainder of the parks fencing required to be 6' commercial grade galvanized chainlink. The park plan and grading plan for the park block shall be completed so as to permit a future trail installation of a maximum 5% longitudinal slope with a maximum 2% cross slope.

Grand Erie District School Board (GEDSB):

- The subject lands are within the school boundary for Lynndale Heights Public School (JK-8) and Simcoe Composite School (9-12).
- Lynndale Heights Public School is currently operating over capacity and may not have space to accommodate all the students generated from this development.
- We request that the following be included in the conditions of draft approval;
 - o That the Owner/Developer must agree in the Subdivision Agreement to notify all purchasers of residential units and/or renters of same, by inserting the following clauses in all offers of Purchase and Sale/Lease:
 - *“Despite the best efforts of the Grand Erie District School Board (GEDSB), accommodation in nearby facilities may not be available for all anticipated students. You are hereby notified that students may be accommodated in temporary facilities and/or bussed to a*

school outside the area, and further, that students may, in future, be transferred to another school.”

Development Engineering: (Revised Plan Submission August 2025)

Area Servicing (Functional Servicing Plan):

The original area concept servicing plan for the area (entire area including lands outside the area of the subject submitted draft plan) accommodated a sanitary trunk and trunk watermain along Woodway Trail which would allow for servicing extensions into the adjacent lands. The FSR will need to continue to demonstrate and account for these servicing extensions into the adjacent lands. At present there is an active (Draft Plan approved) plan for the lands of 682 Ireland Road which requires consideration.

Staff acknowledge the inclusion and confirmation of the ability to service the adjoining lands with a sanitary service emanating from these lands into the lands north of Decou Road. The County, in effort to ensure serving can be provided to the adjoining lands at a point that meets their needs, will require the conveyance of the road allowance that supports these service lines (water and sanitary) as part of Phase 1.

Staff acknowledge the comment pertaining to the SWM plan:

The indicated designs may be altered during the detailed design of the phases to improve efficiency and produce cost savings. During detailed design the intent will be to maximize the amount of storm flows being directed to the existing SWM pond as opposed to directly discharging to the outlet system from the SWM pond. For example, we will explore the possibility of directing the storm flows in the sewers on the southern end of Woodway Trail towards Street A (i.e., towards the pond) as opposed to directly discharging into the pond's outlet system (i.e., Block 4).

Please refer to identified concerns with the suggested SWM approach of releasing uncontrolled and treated runoff into the outlet of the existing pond. The water quality components of Post 3 (major) and Post 6 still need to be designed. Staff require that effort be made to direct runoff from Post 6 and the overland flow from Post 3 to the pond. Staff would advise that should additional capacity be required within the pond that would result in the pond falling out of compliance with the MOE Storm Pond Design Guidelines – advance discussions will be required. It will be important to resolve any necessary pond modifications, including block size modifications, prior to Draft Plan approval.

Staff will ensure RVA completes the necessary water modelling to ensure water servicing is sufficient for the entire development area – inclusive of the lands south of this proposal.

Staff note the tag on the drawing about the pathway around the SWM pond – “emergency access route”. This tag should be removed as the trail around the pond is not suitable for use as an emergency access route.

Contact with the owners of lands to the immediate south of the proposed development parcel will be necessary to garner input on land use expectations and plan interfacing (grading/servicing). The County is aware that the landowner to the immediate south has further advanced their concept plan for their land which should be taken into consideration.

The applicant is also advised that the plan should be updated to extend the Trillium Road right of way to the west edge of the plan. This right of way will also encapsulate the sanitary and watermain trunks which exit on the west side of the plan.

Land Use Compatibility:

The revised plan submission appears to provide an appropriate setback from the proposed expansion area of the Simcoe WWTP to the residential sensitive land uses. Notwithstanding County staff report PD-09-76, which recommended that any sensitive land use be setback 150m from the eastern property line of the Simcoe WWTP, staff are satisfied with the setback arrangement which provides 150m of separation between the proposed plant expansion area and sensitive residential uses.

Storm Water Management:

The County has completed a cursory review of the revised plan and accompanying SWM report. As forecasted by staff, the existing SWM pond requires revisions to support the increased development within the plan. We note that the report indicates that the pond will only provide basic protection to the receiving stream (60% TSS removal) and will defer to the Conservation Authority on the required TSS target for the protection of the Lynn River. While we appreciate that a dry pond could commonly deliver basic (60%) water quality treatment, however the target is established by the receiving body (Lynn River) and not the limitation of the on-site facility. Staff note that the release volume for more minor events has been increased to allow for increased volume retention for larger events. Given that the existing release point and receiving channel already appears to be experiencing significant erosion, a determination of the point of discharge erosion threshold should be determined and assessed against the revised release volumes for the lower return events to ensure that the erosion conditions are not further exacerbated. Alternatively, remediation of the release point and channel may be required to improve the channel resilience to erosion, especially if the proposed release flow rate for lower return events is increased.

The County will seek a demonstration plan supporting the use of the 55% impervious cover for the condominium blocks as this appears relatively low in contrast to typical condo blocks. Should 55% be used at this stage, the condo blocks may require separate on-site controls should they develop with a impervious cover >55%.

The submitted SWM report did not include detailed engineering plans for the modified pond. Staff note the comment that the modified pond will still comply with the MOE's Stormwater Management Practices Planning and Design Manual (March 2003) and requirements outlined by Norfolk County, therefore we expect the modified pond to retain its safe side-slopes of 7:1 and 4:1. The emergency spillway accommodations will be further assessed during the detailed design phase to ensure the spillway takes into consideration reasonable assumptions for blockages which may result in overtopping of the CB emergency inlet. The emergency spillway overland flow route will need to be assessed for appropriateness.

Staff note the comments in the SWM report with respect to Post 3 (major) and Post 6 areas not being directed to the pond and that water quality control will need to be managed by other means. The report contains no commentary on how water quantity control will be applied to these areas. The report notes that the area of Post 3 (major) will be direct to the ponds outlet, however no details are provided on the mechanics of such a connection. Staff notes the commentary that Post 3 area (major) was not originally designed to drain to the

pond however Plan SW1 May 2011 by Vallee Engineering indicates that area of Post 3 (major) was to be directed to the pond. Clarification of these statements is required. An updated SWM report will be required to provide details on how water quantity and quality control will be applied to these areas (Post 3 and Post 6) and how the overland flows (for major events) will be appropriately controlled and accommodated. Due to the topography, it may be necessary to drain areas Post 3 and Post 6 into a stormwater management pond located on lands south of this development parcel. If the proposal is to control runoff via 'superpipe' or 'underground storage facilities', the applicant may be required to assess the increased long term maintenance costs associated with these treatments over that of traditional storm water control/treatment facilities and provide financial compensation for these increased life-cycle costs.

Traffic Impact Study:

Staff have completed a cursory of the provided "Updated Alternate Access" letter. This letter assesses the need/justification for a second northerly collector roadway connection to Victoria Avenue on the west side of the development as portrayed in the County's Official Plan.

Staff met with the Applicant on August 28 and advised that the report had some questionable traffic assignments and that if these assignments were corrected, there is merit and justification for a second northerly collector road connection to Victoria Avenue. County staff sought concurrence with our position however the discussion resolved around the financing for this roadway. Staff did suggest that this collector roadway would be of benefit for lands beyond that of the current application and there would be merit for the consideration of this roadway within the County's Development Charge Bylaw. Should the roadway be successfully added to the Bylaw Charge, this roadway could then be considered under a front ending agreement. A copy of the County's Front Ending Agreement Policy has been provided to the applicant. As the discussion resolved around how the roadway could be financed as opposed to securing confirmation on agreement of need, the Updated Alternate Access letter will be peer reviewed to ensure the County's rationale for the second northerly collector road is confirmed. Should a second northerly collector road be confirmed as justified, then this roadway could resolve the concerns of construction access and emergency services provisions for the area. Should this secondary northly collector road be denied, these matters (construction access and any additional emergency access into the area (not within the area) will need to be addressed with suitable alternative solutions. Additionally, should a second northerly collector connection to Victoria Road not proceed, then modifications to some existing roadways may be required to accommodate the increase in travel demand on those roadways.

Given the concerns over financing of the Collector Roadway, the County proposed the following several options to the Applicant, each of which serves to ensure that the costs of this roadway (and trunk sanitary servicing) are fairly allocated to those benefiting from these services. The options include

1. The use of a Development Charges Front Ending Agreement
2. The use of an Inter-Developer Agreement
3. The use of Cost Recovery Agreement

Staff note, that the County has an active Class Environmental Assessment underway for the Simcoe Wastewater Treatment Plant. This Class EA study has identified the need/benefit for providing a new entrance/egress to this facility from Victoria Street. The proposed alignments for a new/improved facility entrance is in the same location as the proposed second northerly collector roadway being suggested to support the subdivision lands east of the Simcoe WWTP facility. Given the potential mutual benefit of this roadway, a portion of the funding of a second northerly collector road connection to Victoria Street could be attributed to the Simcoe WWTP facility expansion. The Class EA study recognizes the presence of the Lynn Valley Rail Trail and the abutting natural environment. The proposed roadway would be designed to ensure a minimum footprint and continue to support the presence of a walking trail within its boulevard area.

The County also received an updated Traffic Impact study based on no second northerly access road. The Traffic Impact Study is now out for Peer Review. Of concern is the commentary on a number of key area intersections where the overall level of service for the intersection is reduced to E or F and/or the 95th percentile queue length exceeds the available storage space (see PIC #1 comments). The attribution of these conditions to the increased traffic loading from the development and possible remedies to resolve these degradations in service, should be identified.

The August 2024 TIS attributes a 12% increase in traffic to the Queensway and Donly Drive intersection. This increase will exacerbate the operational conditions at this intersection. The August report (no longer noted in the Updated report) suggests that signal inter-connection work may be appropriate to provide 'gaps' in the Queensway traffic flow to improve operational conditions for left turns. The report lacks details on the cost for such remedial work and if the suggestion serves to return the intersection to a pre-development level of service. The report should be updated to clarify the need/benefit for these improvements and any attribution to the development.

County staff remain of the opinion that construction access should not be through the existing built community, and that a suitable construction access route through abutting land should be secured. Should the second northerly collector road be required, then this roadway could serve as a construction access route. The applicant is advised to forecast how future phases will be developed to minimize impact on new and existing residents in the area.

Zoning Lot Size:

Engineering has agreed to the use of a 6.0m frontage however small frontages (especially when proposed on both sides of the street) can pose challenges to providing sufficient on-street parking for the neighborhood. Engineering can support the minimum 6.0m frontage on the premise that the opposing side of the street be single family detach homes (>6.0m frontage) in order to provide a reasonable level of on-street parking.

Woodlot Assessment:

Engineering staff referred our earlier concerns to Forestry and Planning team whom are now in receipt of an Updated EIS.

August 6, 2025 – Letter of Application to Planning:

Engineering has reviewed this letter and has the following comments:

1. Statement: *Based on this report by Paradigm, Donly Drive is sufficient as the only road access to this development.*

The Paradigm report does not conclude with this statement. The report merely outlines the various volumes that will result on the 'feeder roadways' with and without a second northerly collector road. This report also over-represents the upper threshold volume for a minor collector roadway. The upset limit should be 5,000 AADT for a minor collector road, not 8,000 AADT. Donly is best described as a minor collector roadway.

2. Construction Access: Staff appreciate the sharing of past sites whereby construction access through existing neighborhood's may have happened. As those past practices posed challenges and concerns for both the County and the residents of those areas, staff continue to recommend that these situations be avoided where reasonably possible. Staff remain of the position that suggestions to date are reasonable to avoid unnecessary disruption to, and wear and tear on, the areas adjacent local road system.

Planning Justification Report:

The Traffic section of this report lacks commentary on the Official Plan Schedule E-2 which portrays a second northerly potential (collector) road connection to Victoria Street on the west side of the subject development area. The commentary refers to a Paradigm Transportation Solutions Limited report that suggests the increased traffic volume of 171% over original concept use (change from 3700 vpd to 6330 vpd) or 133% over the current area planned use (change 4750 to 6330) is appropriate for Donly Drive. Staff do not agree with this position.

It is important to note that the area development plan has changed since the original concept plan. The original concept plan proposed 1,156 units for the area, generating roughly 8,878 daily travel trips. The current planned number of units for this area is 1,628 units, generating roughly 10,690 daily trips (a 20% increase).

A review of the Updated Access Assessment finds that, if a second collector were provided to Victoria Street, that Donly would operate within its threshold (4,750 – 95% of its classification threshold) for a minor collector, and the new connecting road would take some 1,580 daily trips, plus truck trips accessing the Simcoe WWTP. Without a second northerly collector road, Donly Drive is forecasted to support some 6,330 daily traffic trips (approximately 27% above its threshold).

Based on the above, the area should develop (from a Traffic perspective), per the roadway fabric set out in the Official Plan with a second northerly connection to Victoria on the west side of the plan.

The Servicing section (Stormwater) of this report suggests that drainage from the site will be conveyed to a storm sewer system and managed by the existing stormwater management (SWM) facility located on Block A. The underlying SWM report suggests that a portion of the site will not be directed to the SWM pond and does not provide

clarity on how these areas will receive stormwater control and treatment. The Planning Justification report should be in harmony with the underlying detailed reports.

Paramedic Services: Reviewed. No comments.

Zoning: Reviewed. No comments.

Accessibility: Reviewed. No comments.

Hydro One: Reviewed. No comments.

Drainage: Reviewed. No comments.

Finance: No comments at this time.

Conseil scolaire de district catholique Centre: No comments received.

Brant Haldimand Norfolk Catholic District School Board (BHNCD): No comments received.