



March 31, 2021

Mr. Kyle Plas  
Community Planning Department  
City of Burlington  
426 Brant Street Po Box 5013  
Burlington, ON L7R 3Z6

Legislative and Planning Services  
1151 Bronte Road,  
Oakville, ON L6M 3L1  
Fax: 905.825.8822

Dear Kyle:

**Re: Development Application Comments – Eagle Heights/Taylor Development Files  
File No's: 505-12/04, 510/06/04 (24T-04006/B) & 520-23/04 – Eagle Heights Lands  
505-13/04, 510-07/04 (24T004007/B) & 520-24/04 – Taylor Lands  
Legal Description: Part of Lots 7, 8 and 9, Concession II EF and Part of the Unopened  
Road Allowance between Lots 7 and 8 (Paletta Lands); Part of Lot 7,  
Concession I EF (Taylor Lands)  
LPAT Case No. PL020959-0040223**

Halton Region is in receipt of a submission of materials provided in support of the above noted development applications (items listed in Appendix 'A') as part of an ongoing Local Planning Appeals Tribunal (LPAT) proceeding. The following comments and the attached appendices are provided in consideration of the supporting documentation and to respond to a Local Planning Appeals Tribunal's decision.

In providing the following comments, Regional Staff note that the last formal correspondence provided on the above referenced applications was issued to the City on September 27, 2013. Since this time, the Regional Staff have attended a number of site visits, in addition to commenting on a Niagara Escarpment Planning Act Amendment application (UA-24) and a Niagara Escarpment Development Permit application for the portion of the lands located north of the hydro corridor and fronting onto Horning Road.

This comment letter reflects Staff's opinions on the most recent submission by the applicant on the above noted *Planning Act* matters (items listed in Appendix 'A'), and is consistent with the April 30, 2020 direction of the LPAT.

### **Provincial and Regional Policies**

Regional Staff have considered the submitted Development Applications and the proposed development in the context of current applicable Provincial policy regime, namely the Provincial Policy Statement, 2020 (PPS), A Place to Grow (Growth Plan), 2019, and the Greenbelt Plan, 2017. The following comments reflect this planning direction and Staff's opinions on the proposed Local Official Plan Amendments (LOPA) for the Eagle Heights and Taylor lands.

Given that there are fundamental concerns with the principle of use and limits of development, these comments focus on the submitted LOPA. As such, we have not provided separate detailed comments on all aspects of the Zoning By-law Amendment (ZBA) and Draft Plan of Subdivision (DPS) applications. However, we note that our comments below on the limits of development apply equally to the LOPA, ZBA and DPS.

### **Regional Municipality of Halton**

HEAD OFFICE: 1151 Bronte Rd, Oakville, ON L6M 3L1  
905-825-6000 | Toll free: 1-866-442-5866

In the context of the Region's Official Plan, 2009 (ROP) the subject lands are designated as part of the North Aldershot Policy Area and Regional Natural Heritage System on Map 1 of the Region's Official Plan, 2009 (ROP). Further portions of the subject lands form part of the Greenbelt Plan Natural Heritage System as shown on Map 1G of the ROP.

According to the Regional Structure, these lands are located outside of a *settlement area* and are not consider part of the Agricultural Area. Further, these lands are not located within a regionally identified rural settlement area (*Hamlet* or *Rural Cluster*) as shown on Map 1 of the ROP.

Principle of Use Analysis:

Based upon the above, and in the context of the PPS, lands within the North Aldershot Policy Area are rural lands. In addition to this, the subject lands contain features that form part of a Natural Heritage System (additional discussion below). In directing development on rural lands, Provincial policy provides for a limited list of permitted uses that are locally appropriate and supported by planned or available infrastructure (Policy 1.1.5.2 of the PPS and Policy 2.2.9 (3) of the Growth Plan). Additionally, land use considerations are to avoid the need for the unjustified and/or uneconomical expansion of infrastructure (Policy 1.1.5.5 of the PPS).

In considering this submission, Regional Staff are of the opinion that the proposed residential development, which would include 914 residential units on the subject lands, would result in a significant intensification of site-specific development permissions on rural lands within the rural area. The proposed intensification of development permission is not contemplated or permitted in the PPS and the Growth Plan, as development and intensification of uses are directed to settlement areas (Policy 1.1.3.1 of the PPS and Policy 2.2.1 (2) of the Growth Plan).

In addition to this direction, the Growth Plan identifies that "*New multiple lots or units for residential development* will be directed to settlement areas, but may be allowed on rural lands in site-specific locations with approved zoning or designation in an official plan that permitted this type of development as of June 16, 2006" (Policy 2.2.9 (6)). Regional Staff are of the opinion that the proposed development does not conform to the Growth Plan in this regard as the proposal would result in an increase of 505 residential units above what is permitted in current zoning and City of Burlington's Official Plan policy.

The ROP permits a limited amount of development in certain locations within the North Aldershot Policy Area while preserving significant natural areas and maintaining the predominantly rural open space character of the landscape. This direction is consistent with City OPA 197 and implementing zoning which permits a limited amount of residential development on these lands.

Further, and in the context of the ROP, Regional Staff are of the opinion that the proposed 914 residential units is not considered to be 'limited development' as contemplated in the North Aldershot Policy Area designation and does not conform to ROP policy that directs growth and intensification of uses to the Urban Area and supporting Intensification Areas, does not represent a limited amount of development in certain locations that preserve the natural area, and does not maintain the open space character of the landscape.

In providing the above, Regional Staff note that while Section 2.2.9.6 of the Growth Plan identifies that some development permission (i.e. those uses that were permitted prior to June 7, 2006) may exist on these lands based upon the inforce zoning and official plan designation(s), that these permissions cannot be read in isolation of the other Growth Plan policies. For instance, this direction does not provide exemptions to Natural Heritage System for the Growth Plan polices

which require the identification and protection of natural areas as outlined in Section 4 of the Growth Plan as previously noted.

Limits of Development:

The PPS, Greenbelt Plan and Growth Plan provide for the identification and protection of natural heritage features, key hydrologic areas, key hydrologic features, and key natural heritage features for the long-term. In the case of natural heritage features, development and site alteration is not permitted within certain features or their adjacent lands unless it has been demonstrated that the development or site alteration will result in no negative impact to the feature or its ecological function.

Through the PPS, Greenbelt Plan and Growth Plan, the Province has provided policy direction that supports the comprehensive, integrated, and long-term protection approach to planning for the protection of the Region's natural heritage and biodiversity. The Greenbelt Plan and Growth Plan also include a number of policies that provide for the identification and protection of key hydrologic and key natural heritage features outside of settlement areas.

In considering the submitted LOPA, portions of the subject lands, and the proposed development will fall within lands identified and mapped as forming part of the Greenbelt Natural Heritage System. These areas have been incorporated into the ROP and are shown on Map 1 & Map 1G of the ROP. Through the Growth Plan, the Province has also mapped the subject lands as forming part of the Natural Heritage System for the Growth Plan (NHSGP). While the Provincial mapping of the NHSGP does not apply until it has been implemented in the applicable upper-tier or single-tier official plan, the Natural Heritage System policies of the Growth Plan will apply to the natural heritage systems identified in official plans that were approved and in effect as of July 2017 (Policy 4.2.2 (4) of the Growth Plan).

In considering the Greenbelt Plan and Growth Plan, Regional Staff note that appropriate evaluation of the key features and the implementation of Vegetative Protection Zones have not been applied to the Key Hydrologic Feature and Key Natural Heritage Features on these lands. Regional Staff are therefore of the opinion that proposed development limits do not conform to the Greenbelt and Growth Plan direction in this regard.

As previously identified, portions of the subject lands are designated as being Regional Natural Heritage System on Map 1, and are identified as being part of the Greenbelt Natural Heritage System on Map 1G of the ROP. Additionally, the subject lands contain or are adjacent to:

- Features identified as Key Features, as illustrated on Map 1G of the Regional Official Plan, including:
  - Candidate significant woodlands;
  - Life Science ANSI: Grindstone Creek Valley
- Potential unmapped Key Features include:
  - Significant habitat of endangered or threatened species;
  - Significant wildlife habitat; and
  - Fish Habitat.
- Areas identified as enhancement area, linkage and buffer, as illustrated on Map 1G of the Regional Official Plan;
- Mapped features forming part of the Greenbelt Natural Heritages System on Map 1G and in the Greenbelt Plan (2017);
- Conservation Halton (CH) Regulated Areas.

Regional Staff have reviewed and considered the Environmental Impact Assessment (Savanta, August 2018) that was completed in support of the proposed development and the development of the adjacent lands. The Region has received Peer Review comments on the submitted EIA and Water Balance Assessment that identify the following key issues related to this development proposal. The following summary of issues prepared by the Region's Peer Reviewer highlight matters to be addressed as part of considering development and constraint limits for these lands. The detailed Peer Review comments can be found in Appendix 'B' to this letter:

1. This assessment has not adequately characterized the natural features and their functions; has not assessed the proposed development accurately in the context of the PPS, Greenbelt Plan, Growth Plan and ROP; and not demonstrated that the proposed development will result in 'no negative impact' on the natural features or their ecological functions;
2. The submitted justification and development plans have not considered or implemented the direction of the Greenbelt Plan and Growth Plan as it relates to the identification and protection of key natural heritage features.
3. The buffers required by the Growth Plan and Greenbelt Plan have not been applied as part of the evaluation of the limits development on the lands, and have not been implemented on the submitted LOPA. . Regional Staff are of the opinion that the application of the Growth Plan and Greenbelt Plan Vegetative Protection Zones (VPZ) will have an impact on limits and extent of development potential on these lands. In order to conform to the Growth Plan and Greenbelt Plan, VPZ's are to be applied to all Key Natural Heritage Features and Key Hydrologic Features.
4. The proposed development would result in the removal of and encroachment into portions of the Regional Natural Heritage System. Regional Staff are of the opinion that the proposed removal of and encroachments into the Regional Natural Heritage System do not conform to the ROP. Further, the submitted EIA proposes a compensation area as part of the recommendations. Regional Staff are of the opinion that compensation as a form of mitigation is not consistent with and does not conform to the ROP.

In considering the development proposal, Staff note that Conservation Halton provides technical review services to the Region with respect to the delineation and protection of watercourses, wetlands, fish habitat, natural hazards and related concerns. Halton is in receipt of Conservation Halton's comment letters and defer to their technical comments. Further, Staff support these comments in so far as the ROP identifies that Regulated Watercourses form part of the Regional Natural Heritage System. In addition, the ROP provides direction that prohibits new constructions within Hazard Lands (Policy 118(11)) and requires appropriate development setbacks be applied from Regulated Floodplains.

Given the above, the proponent has not demonstrated that the proposed residential development, intensification of development permissions, limits of development, and construction of municipal infrastructure including the proposed new municipal reservoir will result in 'no negative impact' to the natural features and areas, or their functions as is required by the PPS, Greenbelt Plan, Growth Plan and ROP. Therefore, it is the opinion of Regional Staff that the proposed limits of development are not consistent with the PPS and do not conform to the Growth Plan, Greenbelt Plan and ROP.

Notwithstanding the following municipal servicing comments, Staff note that the proposed development would result in a number of RNHS servicing crossings. As discussed in the attached Peer Review comments, sufficient analysis to understand and characterize these proposed

crossings has not been provided. In addition, analysis of the potential long-term natural environmental impacts of the proposed infrastructure was similarly not provided. As such, the application has not demonstrated how the proposed servicing extensions address the PPS and Growth Plan policy direction related to the extension of municipal services and the protection of key natural heritage and hydrological features.

Provision of Municipal Services:

The ROP provides policy direction with respect to the provision of *urban services* (municipal water and municipal sanitary sewer services). In this regard, Map 1 of the ROP identifies portions of the subject lands as being within the North Aldershot Policy Area and within an area 'Eligible for *Urban Services*'.

Staff have considered the submitted Functional Servicing Report (Metropolitan Consulting Inc., August 2018) that was prepared in support of the development proposal. In considering the proposed development, the proposal includes the extension and provision of urban services. Staff note that both the PPS and Growth Plan limit the extension and provision of municipal services to areas outside of settlement areas, and provide for the provision of municipal services so that they are financially viable and support planned growth.

In the context of the ROP policy, Section 139 (3) permits the extension of *urban services* to those locations within North Aldershot Policy Area shown as 'Eligible for *Urban services*' on Map 1 provided that:

- a) a feasibility study has been prepared to the satisfaction of the *Region*;
- b) Regional Council deems it prudent to extend services;
- c) the landowner/developer has met the financial obligations as specified by the *Region*; and
- d) sufficient servicing capacity is available as determined by the *Region*.

The ROP further permits, subject to certain criteria, development within the areas 'Eligible for *urban services*' to be based on the provision of full municipal services and must also address the provisions of the Region's Urban Services Guidelines. The submitted development proposal includes the extension of full municipal services and the connection of the proposed development to those services. Notwithstanding the above noted policy issues with the proposed development, the following summarizes technical issues with the proposed extension and provision of municipal services to support the proposed development:

- There remain significant gaps and outstanding technical matters within the submitted FSR report that have not been addressed or discussed through the Region's previous comment;
- As discussed through Region's December 23, 2020 comments on the Niagara Escarpment Commission Development Permit application, the FSR report acknowledges that there are three options for the location of the proposed water reservoir. The need, preferred location (if appropriate) and the timing (if deemed essential) for the reservoir will be established by a Municipal Class Environmental Assessment to be carried out by the Region. Staff note that while the Sustainable Halton Water & Wastewater Master Plan identifies a municipal reservoir being required to support the planning for this area, the location and timing for the construction of this reservoir will need to be established through a municipally led Environmental Assessment.

- Financial analysis in accordance with ROP direction in support of the proposed municipal servicing extensions was not provided as part of this submission. This analysis is required given the Provincial and Regional planning direction related to the planning and provision of municipal services and infrastructure.
- A full list of technical comments on the submitted FSR can be found in Appendix 'C' to this letter.

In absence of satisfactory servicing analysis, and due to the lack of financial analysis to support the servicing extension, Staff are unable to confirm that the proposed development has addressed ROP policy, guidelines and technical requirements to support the extension of municipal services.

Other Technical Matters:

Section 2.6.2 of the PPS identifies that development and site alteration shall not be permitted on lands containing archaeological resources or areas of archaeological potential unless significant archaeological resources have been conserved. To this end, the Region has adopted archaeological policies that implements this direction of the PPS. According to Regional mapping, the subject lands are identified as having archaeological potential. Of note, this submission circulation was not accompanied by an archaeological assessment for these lands. Further, acknowledgement from the Ministry of Heritage, Sport, Tourism and Culture Industries has not been provided to date. As such, we are not in a position to confirm that the proposed development has addressed PPS and ROP policy in this regard.

Staff understands that through the consideration of the Waterdown Road widening NEC Development Permit application (H-R-2018-2019-239), the NEC has become aware that the Mississaugas of the Credit First Nation have expressed interest in reviewing any archaeological assessment completed for these lands, and should be consulted with in advance of any further consideration of the matter.

The PPS provides direction related to the assessment and remediation of sites prior to development of activity occurring on site such that it is demonstrated there will be no negative impact. Section 147(17) of the ROP further requires that prior to considering any development proposal, the proponent is to undertake a process in accordance with Regional Guidelines and any applicable provincial requirements to determine the potential for site contamination and the steps to bring the site to a condition suitable for the intended use.

Assessment of these lands, with respect to Contaminated or Potentially Contaminated Sites has not been provided. In the absence of appropriate site assessment, Halton Region is not able to confirm that the site is, or will be suitable for the proposed uses, and therefore does not conform this ROP direction.

**DISCUSSION & ANALYSIS**

Based upon a review of the submitted materials prepared in support of the development applications, there appears to be a number of conformity and consistency issues with Provincial and Regional planning direction and the proposed development. These matters include:

- The proposed intensification of residential use permissions outside of a settlement area is not permitted by PPS, Growth Plan and ROP policy direction.
- The extension of municipal services outside of a settlement area to support development of rural lands does not provide for optimization and improved efficiency within existing

municipal water and wastewater systems that are to be prioritized and that these systems will serve growth in a manner that supports achievement of minimum intensification and density targets. Further, financial analysis to support such proposed extensions and new infrastructure has not been provided. The proposed development would not address this direction.

- Sufficient servicing analysis has not been provided to the Region to demonstrate that the provision of municipal services to this area can be supported as outlined in Appendix 'C' to this letter.
- The location, size and type of water reservoir has not been established by the Region through a Municipal Class Environmental Assessment.
- Notwithstanding the above, the 'Eligible for urban services' criteria established by Section 139(3) of the ROP have not been addressed with respect to the extension of municipal services to support this development. Therefore, the Region is not in a position to support the proposed extension of municipal services to these lands and this area.
- The supporting EIA and Water Balance Assessment does not properly identify, characterize, or provide protection of the Natural Heritage System, key features or their functions as defined in the PPS, Greenbelt Plan and Growth Plan as generally discussed above. Further, the proposed development and supporting analysis does not conform with the North Aldershot Policy Area policy direction as it relates to the identification and protection of the sensitive nature of the area, and does not conform with ROP policy direction as it relates to the protection of the Regional Natural Heritage System.
- Appropriate consultation with Indigenous communities has not occurred to date.
- In addition to the comments noted herein regarding the deficiencies in the studies provided as part of this submission, the following studies and assessments are required in order to facilitate a complete review of the proposed development from both a Provincial and Regional planning perspective:
  - Archaeological Assessment of the subject lands;
  - Environmental Site Assessment;
  - Financial Impact Assessment.
- Regional Staff have reviewed the submitted Planning Justification Report (Metropolitan Consulting, August 2018). This report does not evaluate the proposed development in the context of current Provincial and Regional Planning policies as the LPAT directed in its April 30, 2020 Order.
- We defer to the comments from Conservation Halton with respect to the submitted Slope Stability Assessment (Soil-Mat Engineers and Consultants Ltd., March 2018) and the GeoMorphic Assessment (Matrix Solutions Inc., August 2018).
- We defer to the comments of the Niagara Escarpment Commission with respect to the NEC with respects to Visual Impact Assessment (Metropolitan Consulting Inc., August 2018)
- Notwithstanding the above, and given the limits of development and servicing issues that have been identified herein, it is Regional Staff's opinion that the submitted Draft Plans of Subdivision would require revisions to address the limits of development and servicing issues.

## **CONCLUSION**

The development proposal has been considered within the context of Provincial and Regional public policy framework, as contemplated and required through the *Planning Act*. The development proposal would result in an intensification of residential use permissions outside of a settlement area which is not permitted or supported by PPS, Growth Plan and ROP policy

direction. Further, sufficient identification, analysis and discussion of the natural heritage system, and water resources on and adjacent to these lands has not been undertaken in accordance with PPS, Greenbelt Plan, Growth Plan and ROP policy.

Based upon this, we are of the opinion that the proposed development is not consistent with the PPS, does not conform with the Greenbelt Plan and Growth Plan, and does not conform with the ROP.

Please let me know if you would like to discuss the above noted comments.

Sincerely,



Adam Huycke  
Senior Planner, MCIP, RPP, CPT

c.c.           Curt Benson, Halton Region  
                  David Germain, Thomson Rogers  
                  Scott Snider, Turkstra Mazza  
                  Kellie McCormack, Conservation Halton  
                  Nancy Mott, Niagara Escarpment Commission  
                  Thomas Douglas, City of Burlington



**APPENDIX 'A'**  
**MATERIALS/TECHNICAL REPORTS REVIEWED**

- Environmental Impact Assessment, Savanta Inc., August 2018
- Wetland Water Balance Addendum to the Environmental Impact Assessment for Eagle Heights, Metropolitan Consulting Inc., December 17, 2018
- Functional Servicing Report, Metropolitan Consulting Inc., August 2018
- Hydrological Study and Stormwater Management Report, Metropolitan Consulting Inc., August 2018
- Planning Justification Report, Metropolitan Consulting Inc., August 2018
- Slope Stability Assessment, Soil-Mat Engineers and Consultants Ltd., March 2018
- Visual Impact Assessment, Metropolitan Consulting Inc., August 2018
- GeoMorphic Assessment, Matrix Solutions Inc., August 2018
- Draft Plan of Subdivision, Metropolitan Consulting Inc., August 2018.

**APPENDIX 'B'**  
**REGION OF HALTON NATURAL HERITAGE SYSTEM PEER REVIEW COMMENTS**

See attached Peer Review Comments from North South Environmental Inc.

## APPENDIX 'C'

### FUNCTIONAL SERVICING REPORT TECHNICAL COMMENTS

The following technical comments are provided to highlight the deficiencies in the submitted Functional Servicing Report (Metropolitan Consulting Inc., August 2018) and the associated servicing scheme. These comments are not intended to suggest that conformity with the relevant planning direction can be achieved with the submission of sufficient technical justification.

No.	COMMENT
1	There appears to be a minor discrepancy in the total number of units between the two plans. The draft plan of subdivisions (Aug 2018) that were provided for review show a unit count of 134 for Taylor, and 790 for Eagle Height for a total 924 units. Metropolitan Consulting's Phasing Plan, Figure 7.1, has a total of 914 units.
2	Sec. 1.3, page 9, states that staking of drip lines occurred in the fall of 2015, information was provided to the Region, and that to date no response has been received from the Region. Please refer to the Region's Peer Review comments as contained in Appendix "B" of the Region's response letter.
3	Sec. 1.3, page, 10, has an error in reference to environment constraints plans, Figures 1-2 and 1-35 (in pocket), which should read Figures 1-2 and 1-3. A coordinated response considering the Region's Peer Review comments as contained in Appendix "B" of the Region's response letter is required.
4	Sec. 2.4, page 15 and Sec. 2.9, page 24, state that Flatt Road will be constructed by the City, and that Horning Road reconstruction is included in a City forecast, in concert with the Eagle Heights and Taylor developments. The extent of this is to be confirmed, since this will affect the servicing feasibility within the FSR. For information, Halton Region forecasts local watermain replacement and road restoration, in impacted areas, on Flatt Road to coincide with the City's Waterdown Road reconstruction project.
5	Please provide digital water and wastewater models in the Region's format.
6	Figure 2-11. In the area of the deep sanitary sewer and watermain crossings of the creek, it will need to be determined whether there is sufficient depth of cover to accommodate the mains and appurtenances according to the Region's standards. The size of the easement will have to be looked at closer in this area to align with standards. This is a typical comment with respect to the other Figures in the drawing set. It will need to be determined whether the location of proposed local watermain looping, through the easement, is adequate or if it is better suited in a different location.
7	Figure 2-16. The sanitary sewer main is very shallow in some sections. This will impact the ability to service the lots according to the Region's Water and Wastewater Linear Design Manual.
8	Sec 5.3, page 60. The report references seven lots to be serviced from Waterdown Road. They should be shown on a drawing.
9	Some proposed easement widths are shown in the 2018 Eagle Heights Functional Servicing Report, while others are not. It is recommended that all proposed easement widths are shown. Easement sizes may have impacts on the draft plan of subdivisions. The Regions most recent linear design manual should be used to determine the width of easements.
10	Secs. 2.4 and 2.5, page 15, refers to Figures 2-2 and 2-3. This typical cross section drawing, and the pedestrian facilities plan cross section drawing, would benefit by showing the Region's watermains and wastewater mains in these areas.

11	Figure 2.6 and others. The very large storm sewers/culverts/facilities (2400mm x 1800mm) that are shown travelling down the road right-of-ways, in close proximity to the Region's mains, pose a problem for contributing to freezing of watermains, wastewater mains, water services and wastewater services. The very large storm sewers/culverts/facilities prohibit the water and sanitary service connection laterals from being located vertically in their standard locations, and may prevent lots from being serviced. This is a typical comment with respect to the other Figures in the drawing set, this will be addressed during the detail design stage.
12	Figure 2-7. The watermain within the cul-de-sac to the north may or may not be a candidate for a watermain cul-de-sac loop. This would be reviewed closer at the time of detail design engineering drawings submission.
13	Figure 2-9. The 400mm watermain is considered a trunk (transmission) watermain. Local services are not permitted to be connected to this type of watermain. Local watermains are constructed for this purpose. It will need to be determined at the detail design stage, or sooner at the developer's Engineers' request, whether select local service connection will be permitted to the trunk watermains. Each and every proposed service connection to a trunk watermain will have to be reviewed by the Region. This is a typical comment with respect to the other Figures in the drawing set.
14	Figure 2-10. The watermain and sanitary sewer main that are located within this street do not meet the Region's standard minimum cover requirements. This will need to be reviewed closer at the time of detail design engineering drawings submission.
15	Figure 2-12. The watermain within Street A is shown as a single watermain feed with a auto-flusher unit at the end of the dead end watermain. Auto-flushers, when installed, must include provision to discharge the water used in flushing to a storm sewer. The Region will advise at the time of detailed design on the requirement for an auto flusher and/or watermain looping.
16	Sec. 6.1, Figure 6-1. The Existing Water Distribution System should show the Region's 600mm watermain on Waterdown Road from Highway 403 to the Region's Zone B1 Reservoir located at 1376 Waterdown Road. It should show the local 300mm/350mm watermain in the similar location, and local PRV. Show the 300mm/400mm/350mm watermain within the North Service Road/Exit ramp of the Highway 403 to Waterdown Road. Show the 150mm diameter watermain within Craven Avenue and Nevarc Drive. Show the 300mm diameter watermain within Panin Road. Show the 150mm diameter main within Ireson Road. Show the 100mm system water meter that is located between the Hamilton and Halton systems, in a water chamber approximately 190 meters north of Horning Road. The water meter is located on a 100 mm diameter watermain by-pass off the 250mm watermain within Waterdown Road.
17	Sec. 6.2.4, page 67. Halton uses chlorine and Hamilton uses chloramines (not the other way around). Please revise.
18	Secs. 6.2 and 6.3, pages 64 to 72. The report acknowledges that there are three options for the location of the proposed water reservoir. The final location of the reservoir will be established by a Class Environmental Assessment to be carried out by the Region. It should be further acknowledged that the timing of the reservoir is dependent on the completion of the Class EA.
19	Several dead-end watermains are proposed throughout the development area. Due to potential adverse water quality impacts associated with dead-end watermains, opportunities to reduce dead-end watermains through looping, will be reviewed at detail design.

20	Hard boundaries may be required between some water pressure zones instead of pressure reducing valves. This will be determined at the detailed design stage.
21	The proposed water distribution system shows an easement through 1350 Waterdown Road. The land owner of this property is separately pursuing a site plan application on their property. Confirmation that the easement can still be accommodated is required. Please demonstrate how Phase 1 south of Flatt Road will be serviced should there be no watermain connection to Craven Avenue and Nevarc Drive.
22	Sec. 1.1., pages 2 & 3, regarding the dialogue of the wastewater main (sanitary sewer) preferred alternative. The preferred alternative shows an easement through 1350 Waterdown Road. The land owner is separately pursuing a site plan application on their property. Confirmation that the easement can still be accommodated is required. If the easement cannot be accommodated then localized wastewater pumping stations may be required. The developer will have to investigate this and other alternatives further.
23	Sec. 2.2, page 12, states that the public roads internal to the 2018 plan are proposed to be constructed to rural standards with open ditch drainage. This results in deeper water and sanitary sewer infrastructure as per the Region's Linear Design Manual and should be reflected in the report and furthermore all relevant drawings should be revised to show this increased depth.
24	Figure 2-13. Deep sanitary sewer service lateral connections are problematic and are not supported by the Region's Standards. The FSR should investigate other alternatives, including but not limited to the installation of additional local sanitary sewer mains that will accept the individual service lateral connections, and are at a normal depth.
25	Figure 5-2. The Horning road sanitary sewer main must terminate at the north east limit of the development property, currently it does not extend to the limit of development.
26	Sec. 5.3, page 59. The report states that internal streets will generally be serviced with 200mm diameter sewers and 150mm sewers will be used on the first section of each separate sub-system to facilitate self-cleaning velocities. Please be advised that the Region's Linear Design Manual Sec. 3.3.2 states, for residential areas, the minimum pipe shall be 200mm diameter. This will be reviewed further at the detail engineering design stage.
27	Sec. 5.3, page 60, and Figure 5-2 (Wastewater Collection System). The Region's existing sanitary sewer currently terminates on Waterdown Road, just north of Craven Avenue. As previously noted, the preferred alternative shows an easement through 1350 Waterdown Road. The land owner is separately pursuing a site plan application on their property. Confirmation that the easement can still be accommodated is required.
28	There appear to be no figures (drawings) in the FSR that show Waterdown Road, and the servicing to the proposed single family residential units and the cluster housing that front onto Waterdown Road. It is not clear in the report how proposed lots fronting on Waterdown Road (north of Flatt Road) will be connected to sanitary sewers.
29	Include an Implementation Plan in the FSR for all water and wastewater component works internal and/or external to their subdivisions that are directly related to the Region's Master Plans projects including the Sustainable Halton Water & Wastewater Master Plan projects that the Region currently forecasts for design and construction in future years as per the Region's Capital Budget. Should the owner/developers require some works to be constructed ahead of the Region's timing then they will be responsible to front end finance the works until the Region has identified the works in a current year Capital Budget.

30	<p>The timing of development referenced in the FSR does not match the planned timing of Regional water and wastewater projects required for servicing, as outlined in the Region's Budget and Business Plan. For example, on pg. 65 of the FSR, it is indicated that Regional projects required to service the development are scheduled for completion in 2019; however, based on the latest Budget and Business Plan, these projects have forecasted construction start years ranging from 2025 to 2027.</p>
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