



December 9, 2019

Refer To File: 1045-001

Planning & Infrastructure Services  
Town of Orangeville  
87 Broadway  
Orangeville, ON  
L9W 1K1

Attention: Brandon Ward, MCIP, RPP  
Manager, Planning & Infrastructure Services

**Re: RESUBMISSION: Proposed Residential Draft Plan of Subdivision  
Town Files: OPZ 5/10 and S 1/10  
Part of Lot 3, Concession 2, W.H.S.  
Town of Orangeville, County of Dufferin**

We are the planning consultants representing Brucedale Investments Inc. and Orangeville Highlands Limited, the owners of 17.95 ha (44.36 acres) of land located on the north side of Hansen Boulevard, just west of Highway 10 in the Town of Orangeville. The subject property is legally described as Part of Lot 3, Concession 2, WHS, Town of Orangeville. Applications for Official Plan Amendment, Zoning By-Law Amendment and Draft Plan of Subdivision were filed in 2010 and are referred to as Files OPZ 5/10 and S 1/10 at the Town of Orangeville.

Comments were received from the Town and circulated agencies on October 28, 2019 to the revised plan dated April 3, 2019, and related technical study updates. There have been several iterations of the Draft Plan over the years in response to circulated comments from the Town and agencies. For this resubmission, the Draft Plan of Subdivision dated December 6, 2019 has been updated to reflect the updated underlying base engineering information. However, the plan layout, blocks (sizes and shapes) and lotting has not changed since the April 3, 2019 Plan. Accordingly, there is no proposed change to the draft Implementing Zoning By-Law and it remains the same as the draft provided with the April resubmission.



The Draft Plan continues to propose a total of 541 units consisting of 93 conventional townhouse units, 26 back-to-back townhouse units, 88 stacked condominium townhouse units, and 334 apartment units divided amongst 5 apartment buildings at heights of 5 and 6 storeys. As well, the Plan of Subdivision proposes 6.24 ha (15.42 ac) of natural heritage system to be protected, and open space walkway, two park blocks consisting of 2.10 ha (5.19 ac) collectively (one park block is intended for a dog park), a stormwater management pond consisting of 1.24 ha (3.06 ac) and roads. The proposed Plan of Subdivision is to be serviced utilizing municipal services.

This resubmission relates to technical summary responses and updates to the last round of comments received, in effort to satisfy the Town and agencies and to advance to final approval of this Draft Plan of Subdivision. This comprehensive resubmission provides the following technical reports to provide a complete and comprehensive overview of the development proposal:

- 3 full size copies of Draft Plan of Subdivision prepared by Glen Schnarr & Associates Inc. (December 6, 2019);
- 3 full size copies of Draft Plan of Subdivision prepared by Glen Schnarr & Associates Inc. with Toe of Slope, Stable Slope and Erosion Access Allowance Overlaid (December 6, 2019);
- 3 copies of “Response to Comments” prepared by Water’s Edge Environmental Solutions Team (December 5, 2019);
- 3 copies of “Orangeville Highlands Phase 2: Response to Agency Hydrogeological Comments” prepared by Azimuth Environmental Consulting Inc. (November 28, 2019);
- 3 copies of “Response to Agency 3rd Submission Review Comments related to the Environmental Impact Study and Management Plan” prepared by Azimuth Environmental Consulting, Inc. (November 28, 2019);
- 3 copies of “3<sup>rd</sup> Engineering Submission (in support of Draft Plan Approval)” prepared by Urbantech (December 12, 2019)
- 3 copies of “Functional Servicing Report” prepared by Urbantech (November 2019);
- 3 copies of “3<sup>rd</sup> Engineering Submission” Response to CVC Comments prepared by Urbantech (December 4, 2019);
- 3 copies of “Orangeville Highlands Facility Fit Planning Justification” prepared by Alexander Budrevics & Associates Limited Landscape Architects (December 4, 2019);



- 3 copies of “Response to 3rd Submission Review Comments (Urban Design Brief)” prepared by John G. Williams Architects (December 4, 2019);
- 3 copies of “Shadow Study” prepared by John G. Williams Architect (December 4, 2019);
- 3 copies of “Active Transportation Plan” prepared by John G. Williams Architect (December 4, 2019); and
- A Drop Box Link (in place of a USB).

Below is a summary of where specific responses to each Town and agency comment can be found within this submission:

**Canada Post:**

Canada Post comments relate to Conditions of Draft Plan Approval. It is expected these will form Conditions to Draft Plan Approval.

**Upper Grand District School Board:**

Comments indicate that the School Board has accounted for this development in their projections and that overcrowding is not anticipated as a result of this development.

**Dufferin-Peel Catholic District School Board:**

No Further Comments have been received.

**Town of Mono:**

No Further Comments have been received.

**Ministry of Transportation:**

No Further Comments have been received.



**Town of Orangeville:**

**7.1 Triton Engineering Services Limited: Peer Review of Traffic Impact Study**

**Staff understand that payment for the previous peer review invoice remains outstanding.**

Invoice #010195 was paid with OH cheque # 853 dated July 8, 2019, and we have confirmed that the cheque has cleared the account

**7.2. Infrastructure Services, Public Works – Transportation & Development Division**

Detailed response to Tony Dulisse 's comments of July 16, 2019 is contained in Urbantech's 3rd Engineering Submission Response letter dated December 12, 2019.

**7.3. Community Services, Facilities and Parks**

**...The applicant was asked to prepare preliminary design concepts for a feasible trail crossing and connection. Staff have also asked the applicant to consider including a trail which extends south around the stormwater management facility and additional opportunity to include a trail loop within the park block 25...**

As noted in Urbantech's 3rd Engineering Submission Response letter dated December 12, 2019, the trail connection is proposed along the southern limit of the pond (adjacent to Hansen Boulevard), and then proceeds to provide access the mall to the east. It is noted that Urbantech examined different options for the trail and have confirmed that this routing is the most practical, feasible and safe option in light of the grading constraints, the slope anticipated for the side of the pond berm/slope, the unlit nature of the pond maintenance trail and general safety reasons.

As noted in the Budrevic's December 4, 2019 Facility Fit Plan and related written correspondence in support of the Plan, a trail system has been depicted around the perimeter of Park Block 25 and may be accommodated within Park Block 24 at detailed design.



#### **7.4. Planning Division**

##### **1. Official Plan**

**Staff note that the latest draft plan (dated April 3, 2019) shows a decrease in the total number of apartment units for Blocks 23 and 24, from 432 units to 334 units, and an increase in the proposed stacked townhouse units for Blocks 20 and 21, from 72 units to 88 units. The revised unit configurations for these dwelling types results in a reduced overall unit count, from 623 units (September 2018 submission) to 541 units (April 2019 submission), which is similar to the number of units proposed with the original subdivision application submission in June 2010 (545 units). ...As a result, Planning Division staff are of the opinion that previous concerns with respect to density calculations for both the specific dwelling types and the overall site as a whole, have been addressed by the revised draft plan submission. Therefore, the current Official Plan Amendment application (File OPZ 5/10) is not necessary to facilitate the proposed development.**

Noted.

##### **2. Urban Design Brief**

Detailed response to the Town's comments related to the Urban Design Brief are found in John. G. Williams Limited "Response to 3rd Submission Review Comments" dated December 4, 2019. This response is accompanied by a detailed shadow impact study which demonstrates that the proposed 5 to 6-storey apartment buildings in the southern portion of the site will be sited, massed and designed to fit harmoniously into the planned development and limit negative shadowing impacts on neighbouring streets, parks, open spaces and properties. This detail has been provided and accordingly, it is proposed that additional provisions for the Zoning By-Law (as suggested by the Town comments) are not necessary. Moreover, introducing additional detailed provisions into the Zoning By-Law for these lands would be generally inconsistent with the parent RM1-24 Zone which currently prescribes general provisions for (only) Lot Area, Lot Frontage, Yards, Height and Density. All of these provisions have been accounted for in the site specific zoning



being sought for this project. Accordingly the draft implementing Zoning By-Law remains the same and has not changed form the Draft provided in April 2019.

### **3. Facility Fit Concept Plan**

**A Facility Fit Concept Plan was submitted for Park Blocks 24 and 25. Community Services, Parks and Facilities Division staff have requested certain amenities to be included in the park block design, which will to be implemented as necessary at the detailed design stage.**

Budrevic’s December 4, 2019 Facility Fit Plan and related written correspondence in support of the Plan, illustrate and outline the park components that are proposed and may fit within each of the park blocks. There is rationale provided in the Budrevics submission which relates to the inclusions and exclusion of certain features.

**In addition, the “Addendum to Environmental Impact Study and Management Plan” (Azimuth Environmental Consulting Inc., April 15, 2019) states that the mitigation for the loss of woodland will occur through compensation planting in the Park Block 25, noting that the Town is amendable to this compensation occurring within the Park Block. It is unclear on the Facility Fit Plan as to where this compensation planting is to be situated.**

As noted on the Park Facility Fit Plan and explained in further detail in both the Budrevic submission (dated December 4, 2019) and also in the Azimuth “Response to Agency 3rd Submission Review Comments related to the Environmental Impact Study and Management Plan” dated November 28, 2019, the location of the proposed Compensation Planting Area is depicted on Figure 3 of the EIS (Azimuth) and on the Park Facility Fit Plan (Budrevics). Through correspondence with CVC, it has been confirmed that compensation for the woodland removed will be provided at a 1:1 ratio, therefore, the total area of proposed woodland Compensation Planting Area will be 0.11 ha or greater in size. The Facility Fit Plan has been updated to indicate where the Compensation Planting Area is proposed, along the western limit of Block 25.



#### **4. Development Concept Plan**

**Received. There are no comments regarding the development concept plan. However, the submission documentation (Planning Justification Report Addendum and Urban Design Brief) suggests that the proposed apartment buildings on Blocks 22 and 23 will contain one level of below-grade parking. Staff support the development of below-grade parking as part of any future site plan application for the development of these blocks as this would decrease the amount of surface parking area required for the apartment dwelling units.**

**Although the submission proposes below-grade parking, the supporting Hydrogeological Addendum report does not address the potential viability of accommodating below-grade parking in proximity to the seasonally-high groundwater table. It only addresses the depth of basement and retaining wall footings, as well as construction excavation above the groundwater table. Further confirmation should be provided on the viability of accommodating below-grade parking relative to groundwater table elevations for this portion of the site.**

Urbantech's "Hydrogeology: Response to Agency Comments" dated November 28, 2019 outlines that a review of the high water table elevations at Block 22 (422 - 423.25 masl) and Block 23 (~426 masl) would be approximately 2.3 m and 3.7 m below the proposed grade in those locations. The memo notes that underground parking depths are typically about 3 m for each level and accordingly, there may be encroachment with the high water table; however, this encroachment can be mitigated through revision of the base elevations during detailed design or through lining / waterproofing the foundation. Additional detail in this regard will be flushed out at detailed design.



## **5. Planning Justification Report**

**The April 2019 Planning Justification and Rationale Addendum Report has provided an analysis of the specific housing types and their corresponding appropriateness for the subject lands, compatibility with surrounding developments and conformity with Town Official Plan policies. This comment has been addressed.**

Noted.

## **6. Functional Servicing Report**

**This comment will be addressed once confirmation is received from the Town's Public Works Division that the methodology, conclusions and recommendations contained in this report are satisfactory and appropriate.**

As noted above, Urbantech's "3<sup>rd</sup> Engineering Submission" (December 12, 2019) provides a detailed response to T. Dulisse's comments from Public Works.

## **7. Traffic Impact Study**

**This comment will be addressed once confirmation is received from the Town's Public Works – Operations and Development Division, and the Town's peer review consultant (Triton Engineering Services) that the methodology, conclusions and recommendations contained in traffic impact evaluations are appropriate and acceptable.**

As noted above, Triton Engineering's only comment related to a request for payment of their Peer Review Fee. This is confirmed to have been paid.





## **8. Water Balance Assessment**

**This comment will be addressed once satisfactory comments are received from Credit Valley Conservation confirming that the Hydrogeology report and water balance calculations are appropriate. CVC comments contained herein indicate that the water balance, feature based water balance and hydrogeology report is satisfactory, however there are additional CVC comments related to LID features and infiltration comments that need to be addressed.**

Detailed responses to CVC comments related to engineering and hydrogeology are contained in Urbantech's "3<sup>rd</sup> Engineering Submission" Response to CVC comments dated December 4, 2019 and in Azimuth's "Response to Hydrogeological Comments" dated November 28, 2019.

## **9. Tree Inventory and Preservation Plan/Report**

**...With respect to the proposed removal of the existing trees (identified as No's. 957, 958, N1, 959 and 2) along the western edge of the proposed Street 'B' extension of Amelia Street, the report indicates that the removal of these trees is required to accommodate the development. Table 1 of the report indicates that the evaluated attributes of these trees are in good or fair health condition.**

**Public comments indicated an interest in maintaining existing trees in this location and were particularly concerned about the proposed development impacting, or requiring removal of trees on the abutting properties. Recognizing the intended road extension in this location, further consideration should be given to avoiding removal of these trees by re-evaluating the ability to construct the road infrastructure in this location while maintaining nearby tree vegetation...**

Urbantech's "3<sup>rd</sup> Engineering Submission" response to comments dated December 12, 2019 addresses this comment. Specifically, they note that there are significant grading constraints associated with the western edge of the site and these constraints include matching into the existing property line grades to the west, matching into the existing



Hansen Boulevard grades, providing programmable (i.e. “flat”) space throughout the park blocks and meeting the Town’s road design requirements for proposed Street B. It is noted that no trees are proposed to be removed on any of the adjacent private properties. The trees that are proposed to be removed along the western edge of the Street B extension are located on lands that were intentionally dedicated to the Town as part of the adjacent subdivision registration for the purpose of a constructing a public right-of-way; accordingly, there should not be a present concern with these trees now being removed for that purpose.

#### **10. Environmental Impact Study and Management Plan**

**...Confirmation that the Environmental Impact Study and Management Plan is satisfactory (i.e., has addressed the foregoing policies of the Town’s Official Plan), will be determined upon receipt of satisfactory comments from Credit Valley Conservation...**

Noted. It is anticipated the Azimuth’s latest submission will address all outstanding CVC comments.

#### **11. Trail System**

**Previous Planning Division comments regarding the accommodation of a multi-use trail system traversing the northern portion of the site are addressed by the Facilities and Parks Division comments discussed above.**

Noted. It is anticipated that Urbantech’s response in this regard will satisfy these comments. The full Active Transportation Plan is included as prepared by John G. Williams Architect (December 4, 2019).

#### **12. Public Comments**

**Comments received from the public through written submissions as well as at the public meeting held on September 10, 2018 were summarized in the November 29, 2018 comment letter and detailed responses to these comments are provided in the**



**Planning Justification Report Addendum (GSAI, April 2019). This comment has been addressed.**

Noted.

**Credit Valley Conservation:**

**Planning/General:**

Draft Plan has been updated to show the meander belt/calculated stable slope and 10m erosion allowance. It is important to note that the lines are not referred to as meander belt width lines because they are technically related to slope stability. So the lines that are shown are specifically Toe of slope, Calculated Stable Slope, and 10m Erosion Access Allowance.

As noted by Azimuth in their “3<sup>rd</sup> Engineering Submission Response to Agency Comments”, Block 28 (Natural Heritage System and related setbacks/buffers) has been placed in the “OS2” (Open Space Conservation) zone. It is anticipated that this block will be dedicated to the Town through this process.

**Ecology / Hydrogeology / Water Balance / Engineering:**

Detailed responses to ecology, hydrogeology, drainage features, wetland creation, engineering, and water balance have been addressed in the Azimuth, Water’s Edge and Urbantech individual responses to CVC comments.



Please accept these materials in connection with a full resubmission of this Application. We look forward to discussing this resubmission with you and responding to any additional comments you may have as we advance this proposal towards approval.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

Karen Bennett, MCIP, RPP  
Senior Associate

Cc: Carmen N. Jandu  
Roberta Harvey