

Glen Williams Estates Inc. (GWE)

GWCA Comments and GWE's Responses

Notes:

1. The GWCA changed to one page per Issue in order to fit comments.
2. Items highlighted in Yellow are comments/edits inserted by the GWCA.
3. Items in *Green/Italics* were added by GWCA in response to Nov 28, 2022 submission by GWE

Initial Response	GWCA	#1	Submission #2 Comments	Response by Developer (GWE)
<p>The GWCA recommends that the Town recognize that implementation of the Glen Williams Estate creates both an impetus and an opportunity to address a long-standing safety issue by:</p> <p>i) Implementing at least a formal path between Mountain Street and Wildwood Road– we prefer that a rural design, rather than an urban design, be used.</p> <p>ii) Installation of a Stop sign southbound on Confederation Street at Mountain Street; this will help to alleviate the risks created by the speeding and limited sight lines.</p>	<p>GWCA</p>	<p>#1</p>	<p>We have no objection to implementing a formal path between Mountain Street and Wildwood Road or installing a stop sign southbound on Confederation Street at Mountain Street. We are happy to work with the Town on these issues.</p> <p>From the figures in the Cut & Fill plans (i.e. Fig 3), it appears that there will be about 50,000 to 77,000 cubic meters of fill to be trucked out under the current plan. This is approx. equivalent to 5,000 to 7,000 truckloads out and then a return trip i.e. 10,000 to 14,000 truck trips.</p> <p>It would be dangerous and unconscionable for the Town to permit such additional traffic without at least first installing a formal path on Confederation.</p> <p>ACTIONS Needed by and with the Town:</p> <ul style="list-style-type: none"> • The GWCA requires a formal commitment to establish at least a “rural” style of path on the east side of Confederation from Mountain Street to Wildwood Road. This must be a pre-requisite to allowing trucking of fill and issuing of a ... occurred, there is a possibility that the Town would be found guilty of not just simple negligence but of gross negligence. • The GWCA has previously suggested the option of Stop sign on Confederation Street for the southbound traffic at the exit from Mountain St. It could help with slowing down traffic before the hill and to the entrance of the development. However, it has been pointed out by others that this could cause safety risks from traffic coming up Confederation from the south. We request input and suggestions from Town staff as to options for reducing the risk arising from traffic going southbound on Confederation Street for those cars emerging from Mountain St and from the GWE development. 	<p>The construction of sidewalks and the installation of stop signs that are located outside of the subdivision are a responsibility of the Town. GWE is supportive of any measures that will improve public safety however we are unable to implement these recommendations.</p> <p><i>GWE is correct; it is an issue for the Town to initiate action and make a commitment.</i></p> <p><i>At a meeting of GWCA with Town staff on May 25/22, GWCA were told,</i></p> <p>“...the Engineering department has a conceptual design study for Confederation Street planned for 2022 and one for Main Street.</p> <p>The study for Confederation will cover from Wildwood Road to Bishops Court. .</p> <p>Although not specifically stated in the meeting, it appears there are not yet any formal plans for the “path”.</p> <p>The tentative date for actual construction of Confederation is 2025.</p>

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<p>The GWCA asks for Council's support in:</p> <ul style="list-style-type: none"> Directing the Town Parks staff to create some trails and open spaces (using the low cost ideas proposed previously by GWCA). <p>Encouraging Town Parks staff to involve the GWCA in the discussions.</p> <p>ACTION: The GWCA needs to meet with the Parks staff prior to final decisions to:</p> <ul style="list-style-type: none"> Provide input to the planning. Gain an understanding of specific plans for trails. <p>NOTE: EIR report Section 7.3.3 provides data on required tree replacement: It shows a need to plant 1,018 trees to offset the impact of removing 80 trees varying in size from 5 cm to 70+ cm in Diameter at Breast Height (DBH).</p>	<p style="text-align: center;">GWCA #2</p> <ul style="list-style-type: none"> Town staff are involved in the discussions related to trails. Town, Region and CVC staff are to meet to resolve issues pertaining to trail location vs. natural heritage policies and advise the landowner how to proceed. [The ideas and decisions (particularly those of CVC) should be shared with GWCA before all are locked down. ACTION: Meet with Town Parks dept.] Glen Williams Estates is happy to work with Town staff on implementing trails and involving Town Parks staff. GWCA Comment: In order for GWCA want to have some input to decisions re locations of trails & allowing public access, we have to meet with Parks staff before all decisions are locked down by CVC. The EIR includes the option for just a loop trail, behind Lots 13-16, which would be outside of the valley and top of bank setback, as well as the option to formalize the existing informal trail within the valley and provide for a potential connection to the subdivision on the west side of the valley, should the agencies be agreeable to using this existing informal trail. <p>From Section 5.1.1.4 of EIR report: Trails within buffers are very limited throughout the plan. Two options have been provided for consideration: (1) utilize the existing informal trails; or (2) create a new looped trail behind Lots 13-16. The existing trails are well developed and transitioning them to formal trails would not require any widening or tree removal. However, the existing informal trails are within the 10m setback from top of bank as well as within the main valley/wetland. As a result of concerns raised by the agencies during the review of the 1st submission of the EIR, an alternative loop trail has been shown that provides for a new trail to be constructed behind Lots 13-16, outside of the 10m top of bank setback but within the 30m dripline setback. This option is proposed in an area of existing disturbance/historically altered topography so there are not anticipated negative impacts associated with Option 2. This option would result in the existing informal trails being restored and removed from active use.</p>	<p>Attached please find CVC's 2nd submission comments for your review.</p> <p>GWE is in full support of trails and allowing full public access to those lands being dedicated as part of the subdivision. While GWE has provided for trail opportunities/connections through the subdivision design, the location and access to trails rests with the Town. We fully expect that the Town will seek GWCA input in this regard.</p> <p>The noted 80 trees refers to existing healthy trees outside of the small woodlots which are compensated for on an individual basis. Trees within small woodlots are compensated for on an area basis through the CVC Ecosystem Offsetting Guidelines if approved through the planning processes. The restoration plan for the removal of small woodlots does not include the landscape trees which are placed within the community. The revised report has been updated to clarify this distinction which includes additional woodlot restoration at a ratio of 1:1.</p> <p>The CVC 2nd submission dated Oct 19, 2021 does not appear to state a tree restoration ratio of 1:1. PLEASE ADVISE IF THERE IS SOME OTHER REPORT WE ARE MISSING. <i>The CVC comments do not appear to specifically address the removal of the "80 trees".</i> <i>If we understand the above statement re "at a ratio of 1:1", then the proposal is to only replace each tree with one new one but with no commitment to use an equivalent size of diameter. We would note that replacing a 70+ cm diameter tree with one of say 10 cm diameter does not balance the ecological impact.</i></p>

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<p>The GWCA objects that the proposed 40% increase in density is overreaching and insensitive to the plans and desires of the community.</p> <p>At a Mar 31/21 meeting with Town staff and GWE staff, Jeff Markowiak indicated that ... "... the Town is still assessing whether an exception on density is OK and, if so, how much.</p>	GWCA	#3	<p>The proposed increased density of development was addressed in detail through the Planning Justification Report.</p> <p>The proposed number of lots (i.e. 34 lots) is less than what the GWSP anticipated for this property. The GWSP land use schedule identifies 8.12 hectares of land designated "Hamlet Residential" on the subject property, which would equate to approximately 41 lots based on a density of 5 units per net residential hectare. With the additional environmental buffers and protections provided which increases the amount of land being dedicated into public ownership, the amount of land designated as Hamlet Residential has been significantly reduced to approximately 4.9 hectares.</p> <p>Comment: The fact that 8.12 hectares was designated Hamlet Residential in the GWSP is irrelevant. The calculation of the allowable number of lots must not include land which must be excluded for environmental reasons.]</p> <p>It is our opinion that the density proposed is not "overreaching and insensitive" nor will it result in development that is incompatible with the community.</p> <p>Comment: The intent & opinion of the community should be the determinant. The intent of 5.0 units per hectare was re-affirmed in the updated GWSP. The proposed design will be incompatible with the rules of the Updated GWSP; these are specifically intended to maintain the nature and character of the Glen.</p> <p>Who determined only 4.9 hectares was available for development? As per a Dec 2, 2021 comment from G Macdonald (Town Planner), "It's more the applicant's own technical and environmental studies in determining the limits of features, buffers, hazards, etc. that resulted in essentially (only) 5 ha of land being 'suitable' for development (subject to ongoing review for hamlet buffers, design, etc.). Certainly CVC, the Region and the Town all have an interest in making sure the limits are set appropriately but it would have been the applicant's own studies that resulted in the 5 ha."</p>	<p>The determination that only 4.9 hectares are available for development was based on research by our team, and review by the Town, Region and CVC staff based on the area available and environmental constraints (dripline, woodlot, wetland etc.).</p> <p>Official Plans are not intended to be static documents. The Planning Act of Ontario provides for the opportunity to consider amendments to Official Plans and such amendments would be considered under Provincial, Regional and local plan policies. We don't share the view that the dedication of approximately 75% of the subdivision, some of which includes lands previously designated Hamlet Residential Area, is irrelevant. Further, we disagree that the density increase is "overreaching and insensitive" especially when the minimum lot size will be achieved without exception.</p> <p><i>The GWCA continues to disagree strongly with the proposed density of 6.9 homes per hectare. Not only does it violate the standard in the Updated GWSP, it also results in a design which is inconsistent with the size of properties located in areas immediately adjacent to the property e.g. Confederation Street, Mountain Street and Glen Crescent.</i></p>

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<p>Impact on private wells is always a point of concern for affected residents in The Glen.</p> <p><u>Recommended Action:</u> The GWCA recommends that the Town staff assess the extent of wells that should be tested and monitored and confirm GWE's formal plans.</p>	GWCA	#4	<p>DS completed a desktop review within 250m of the site and completed a door-to-door survey within 100m of the external sanitary line.</p> <p>Our dewatering calculations indicated that the zone of influence from any dewatering along the sanitary works would be approximately 38m. So far, our survey results show that residents within 100m of the external sanitary line are serviced with municipal water.</p> <p>Based on the information received from the survey, any existing water wells are not currently used as a domestic drinking water supply.</p> <p>Comment to Town and GWE: The GWCA feel that the well survey should be expanded.</p> <ul style="list-style-type: none"> • GWCA understands that at least two wells on Tweedle St are still used for drinking water. • Also the house owned by Dave Cox on Confederation St (98 Confederation Street) we believe is served by a well used for drinking water. <p>We were unaware of these facts at Mar 31/21 meeting with Town.</p>	<p>Please see the attached update well survey. Our Hydrogeologist went back and completed an additional door-to-door survey.</p> <p>The Region of Halton provided additional information on existing services within 500m of our subdivision. This was included in our Hydrogeological Investigation as part of our 3rd submission.</p> <p><i>The updated survey (see Figure 1 - Well Survey) shows no acknowledgment of the two wells we previously mentioned on Tweedle Street. We have since identified that there are three homes on Tweedle Street having private wells as there only source of water i.e.:</i> <i>5 Tweedle Street Mark Rowe</i> <i>7 Tweedle Street Joe Coutts</i> <i>9 Tweedle Street Gary Kirkpatrick</i></p> <p><i>There is also no mention of Dave Cox's well at 98 Confederation Street.</i></p> <p><i>From the heading on the Figure 1 – Well Survey, one cannot tell what was the date of the survey.</i></p>

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<p>Reference: Preliminary Hydrogeological Investigation-</p> <p>Section 4.1.1 Pre-development Sub catchments</p> <p>For Sub catchment areas B3 and C1 combined, this results in a net decrease in area of 7,282 m2.</p> <p>If our understanding is correct, then we have concerns for several homes located on Confederation St. just south of the development. In such case, we will want to know what measures will be taken to ensure this reduction in the amount of catchment does not cause water problems for those homes?</p> <p>Status: Concern resolved</p>	GWCA	#5	<ul style="list-style-type: none"> • The reduction in the drainage catchment area for these homes means there is less overland flow directed onto these properties. [I.e. a lesser amount of water will be flowing to the area of these homes.] The proposed stormwater management system will provide a benefit for these properties and reduce potential impacts from large storm events. [I.e. the SWM system (Note: Not a Pond) will capture and slow the flow near these homes.] • The Town, CVC, and MECP will not approve the development if increases in peak flows are proposed on adjacent properties – the Drainage Act prohibits increases in peak flows on downstream properties. 	Concerns previously addressed.

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<p>Reference: GWSP Section 3.8 (i.e. a buffer) GWCA <u>Comment and</u> <u>Question</u></p> <p>The plan does not appear to specifically provide for this buffer along the north property line of the development.</p> <ul style="list-style-type: none"> • What is the justification for the lack of a buffer as required by the GWSP? • If no buffer is incorporated into the plan, can the Town guarantee that the neighboring property will remain as NHS / PROTECTED COUNTRYSIDE AREA. 	GWCA	#6	<ul style="list-style-type: none"> • As discussed in the Planning Justification Report and noted above, the lands immediately north are within the Greenbelt Plan. The Greenbelt Plan was approved following the approval of the GWSP and contains policies that restrict development thus ensuring the long-term protection of the Protected Countryside/NHS. While a planting strip along the north property line is achievable and a reasonable approach, there is no planning rationale for the Hamlet Buffer. <p style="color: red; font-weight: bold;">[GWCA disagree with the preceding statement. The provision of a Hamlet Buffer was contained in the GWSP approved by the OMB and re-affirmed in the recent update of the GWSP. Is GWE suggesting that the OMB did not assess the rationale in approving provisions for a buffer?]</p> <ul style="list-style-type: none"> • The land use to the north is an agricultural field and the proposed residential use is not anticipated to have a negative impact on the use of those lands. The addition of a buffer would not result in any lesser impacts along the northern property line [GWCA Comment: A buffer could provide a space for intense planting. See CVC comment letter #2, item 8 re needing more density of plantings than proposed i.e., "However the planting densities for trees are proposed at 5 m centres, and that would cover "up to 60% of the area"; this density is much less than typical. Considering anticipated die-off of planted material, typical planting density is usually planned at 1200 trees/ha (i.e., 2-4 m on centre) to achieve a treed community"] 	<p>The other buffer noted in CVC comment Letter #2 is regarding the tree plantings to buffer the existing woodlots. Please see the updated EIR with planting densities for the buffer.</p> <p>GWE is not opposed to planting along the north property line. However, there is no planning rationale to support the need for a publicly dedicated Hamlet Buffer abutting the Greenbelt Plan.</p> <p style="color: green; font-weight: bold;"><i>GWE disagrees with the last sentence above. The planning rationale is the buffer requirement defined in the Updated GWSP approved by the Town and Region.</i></p>

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<p>Note: The CVC letter of Oct 19, 2021 notes under heading of Water Balance that:</p> <p>“ The water balance assessment and analyses completed for the subject site concludes that there will likely be a post-development drop in infiltration of approximately 39% across the site, when compared to the pre- development condition (which is to be mitigated for). “</p> <p>Question for GWE: In doing the water balance calculations, what allowance, if any, has been used for loss of land for infiltration due to installation of swimming pools?</p>	<p>GWCA</p>	<p>#7</p>	<p>Correct – the proposed hard surfaces (roofs, driveways, and roads) associated with the development will have less infiltration (absorption) and will generate more runoff.</p> <p>This change will be managed with the proposed stormwater management strategy, which relies heavily on the use of Low Impact Development (LID) infiltration measures along the internal road and prior to discharge to the wetland to the south. The proposed LID measures ensure the following general principles are addressed in accordance with the MECP (Ministry of the Environment, Conservation and Parks), Town of Halton Hills and Credit Valley Conservation requirements:</p> <ul style="list-style-type: none"> • The “site wide” water balance is maintained under post- development conditions (i.e. mimicking the existing infiltration volumes as close as possible) • The “feature-based” water balance is maintained under post-development conditions for the wetland to the south of the development to ensure it does not receive too much or too little runoff. • Erosion control to ensure that the more rapid and larger volume of runoff from hard surfaces does not impact natural features downstream of the site. • The post-development peak flows generated on the site do not exceed the existing flows. • Water quality treatment in accordance with the MECP Level 1 (80%) TSS removal target. <p>All of the above items have been demonstrated to be suitably addressed in the FSR through the use of LID measures on site.</p> <p>Note:- Section 10 of the EIR states in the Planning Act ... section of the table that “Hydrogeological investigations have been completed and no impacts to groundwater or surface water features are anticipated as a result of the proposed development. [The preceding conflicts with CVC comment shown in the left column re reduced infiltration.] Linkages among groundwater and surface water resources will be maintained and the amount of impervious surfaces has been minimized. LID measures, rather than an end-of-pipe stormwater pond, will be provided which will enhance groundwater infiltration and reduce thermal impacts.”</p>	<p>At the direction of the Town Engineering staff, an imperviousness of 50% has been applied to the lots to take into account the building coverage (roofs), driveways, sheds, pools, and other hard surface areas. Based on the size of the lots (~1,000 m² / 10,764 square feet), this implies that 500 m² (around 5,400 square feet) consists of hard surface. This is a conservative estimate, considering the roof area of the houses will likely be approximately 190m² (around 2,000 square feet). That provides an allowance of 310m² / 3,400 square feet of additional hard surfaces, including pools.</p>

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<p>If the Storm Drainage Block is retained at the proposed location, the developer must ensure that adequate swales are provided to ensure that excess water will not create flooding risks for homes located along Confederation Street.</p>	<p>GWCA</p>	<p>#8</p>	<p>As noted above, it is a requirement by multiple agencies that peak flows are managed on site to prevent impacts to downstream owners. The FSR Stormwater Management section demonstrates that post-development peak flows do not exceed the existing peak flows.</p> <p>Status: The GWCA has concerns re the ability of swales alone to control the water flows during storms. It is a recognized fact (e.g. the insurance industry) that climate change is increasing storm flows. During a sudden melt in Spring 2022, a local resident observed flooding just north of Preston's due to water draining from the swamp. Adding the increased drainage from the 12 – 15 Dorian property acres (due to adding hard surfaces) plus the water that flows into the bowl from the Archdekin property will make flooding at the bottom of the hill worse. Since Confederation already gets flooded now, the development will only add to the problem.</p> <p>Recommendations: The Town should consider hiring an engineer to do their own water balance assessment. Further consideration should be given to installation of a SWM Pond as on other developments. The Glen has experienced significant flooding issues on The Chase development even with a SWM Pond.</p>	<p>All local design standards and guidelines regarding the required quantity control and design storms have been followed. The analysis also considered “frozen conditions”, i.e., with no infiltration on the external property to ensure worse-case scenario flows were accounted for. Calculations are based on conservative infiltration rates of 25mm/hour to 37.5mm/hour, which are significantly less than the actual measured rates of 90mm/hour or higher. In other words, the site “works” to manage runoff even with a much lower infiltration rate based on a safety factor applied to the actual observed rates. There will be no increase in runoff to the wetland. Please note that the total drainage area to the wetland feature is approximately 222 ha. The subject lands represent approximately 7% of the entire area, so the proposed increase in imperviousness on these lands would not impact the overall runoff from the larger drainage area significantly.</p> <p>Flows from the site are generally proposed to drain to the wetlands to the south and are not directed to Confederation Road. Catch basins are proposed at the entrance to the site to pick up drainage from the entrance to the proposed development and direct them into the internal storm sewer network. Total drainage area to the south / wetland has not deviated significantly from existing conditions.</p> <p>The Town and CVC qualified engineers review and assess the models and calculations provided in the studies supporting the applications. According to the MECP (former MOE) stormwater management design guidelines, SWM ponds are not recommended for</p>

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				<p>development areas of this size. Furthermore, a SWM pond would not provide the infiltration volumes / recharge that the proposed SWM strategy achieves. While a SWM pond can control peak flows to existing targets, it would release more runoff volume into the downstream features, whereas the proposed bioretention / infiltration features on the subject lands actually reduce the peak flows AND the monthly runoff volumes slightly as demonstrated in the wetland water balance analysis.</p>

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<p><i>The following measures are proposed to manage stormwater and meet the criteria and objectives: The proposed drainage areas will be conveyed as follows:</i></p> <ul style="list-style-type: none"> • <i>External area (5.9 ha) – all flows up to and including the 100-year event to be captured in a 450 mm storm sewer within the 5 m easement between Lots 8 and 9, and conveyed through the site to the south storm outfall;</i> <p>Comment: The storm sewer and the associated 5 m easement do not appear to be marked on the current drawings.</p> <p><i>Resolved</i></p>	GWCA	#9	<p>The 5m easement is shown on both grading alternatives. Please refer to drawings 3A & 3B</p>	<p>Concern addressed.</p> <p><i>Resolved</i></p>

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<p>1 - Will the sewer pipe from the GWE development (i.e. 102 Confederation St.) to the Glen pumping station have to be pressurized in order to go under the river?</p> <p>2 – If Yes:</p> <ul style="list-style-type: none">• Where will the pump be installed?• What provisions will be installed in case of a power outage or a pump failure e.g. a large holding tank	GWCA	#10 <p>The proposed sanitary sewer servicing the subject lands along Confederation Street to the existing pump station will be a “gravity” sewer (no pumping required). The sewer will drain sewage from the subject lands under “free-flow” conditions and will not be pressurized at any location. Section 5.2 of the FSR describes the proposed sanitary outfall and Figure 8 illustrates the proposed alignment and profile of the sewer.</p> <p>Status: Uses a Gravity Flow design. No pump is needed. Concern resolved</p>	<p>Concern addressed.</p> <p><i>Resolved</i></p>

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<p>The planning documents do not easily provide a clear indication of the scope of the cut and fill operations required to accomplish the planned design. Hence the dramatic change to the topology and ecology is not readily evident.</p>	GWCA	#11	<p>Figure 3C has been prepared to illustrate the cut/fill areas and associated depths.</p> <p>Note - EIR Section 3.2.6.2 states that, “As noted above, a portion of the lands north of the Subject Lands are within the Natural Heritage System of the Greenbelt Plan ... Some grading on the lands to the north is proposed in order to assist with minimizing the use of retaining walls on the Subject Lands.</p> <p>As per the table on Figure 3C, there is 50,481 more cubic meters of soil that is “cut” than is filled. This is equivalent to about 5,000+ truckloads (50,000/10 i.e. 10 cu metres per truckload) to be put somewhere.</p> <p>In addition, if the Archdekin land to the north is not approved for dumping, approximately an added 27,000 cubic metres of fill will have to be trucked out from the site i.e. about an additional 2,600 truckloads.</p> <p>?? - What will be done with the excess soil:</p> <ul style="list-style-type: none"> - Will it require trucking from the site? - Will topsoil be re-installed 	<p>We understand that residents of the Glen would prefer minimal trucks exporting fill material from site.</p> <p>However, it is standard practice that developments that have excess material need to export off site or in some cases, fill will need to be imported into the site due to a deficit.</p> <p>As mentioned, we are trying to work with our neighbor, Jim Archdekin, to minimize the amount of exported fill being hauled long distances from our site.</p> <p>We are also actively investigating if any developments in the near vicinity require fill material so the trucks do not need to haul for long distances.</p> <p><i>The GWCA appreciates that GWE acknowledge the resident concern and are investigating options to resolve. However we would note that the required truck traffic will add to the pedestrian safety issues along the section of Confederation Street between Wildwood Road and Mountain Street.</i></p> <p><i>THE GWCA ENCOURAGES GWE AND THE TOWN TO ACTIVE;Y DISCUSS THE POSSIBILITY OF A CO-FUNDING ARRANGEMENT WHICH WOULD ENABLE THE TOWN TO ACCELERATE THE IMPLEMENTATION OF A RURAL TYPE OF PATH ON THE EAST SIDE OF THAT SECTION OF ROAD.</i></p>

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<p>Based on a walking tour of the property by members of the GWCA, the following is understood:</p> <p>The planned changes to the property will require: The removal of a significant hill about 6 metres high on the northern boundary of the property.</p> <p>As per lines on Figure 3C, the cuts will be as much as 9 meters.</p> <p>Possibly the filling of a valley located in the property to the north with resulting major changes in water flows on the two properties.</p>	GWCA	#12	<p>The proposed grading changes are required to provide a suitable road slope (i.e. to avoid excessively steep slopes within the subdivision) as well as to provide the minimum density of lots required for the zoning requirements.</p> <p>[The problem of suitable road slopes could be resolved by building less homes on the northern section of the property.</p> <p>The above statement regarding providing a “minimum density of lots” is very misleading.</p> <p>There is not a minimum density needed to meet zoning requirements.</p> <p>There is a maximum density prescribed by the GWSP (i.e. 5 units per hectare).</p> <p>The filling of low-lying areas within the lands to the north is currently being coordinated with that landowner. This strategy achieves the following objectives:</p> <ul style="list-style-type: none"> • Eliminates the need for retaining walls • Provides a flatter surface for agricultural use by the owner to the north as opposed to a deeper “bowl”. • The proposed grading changes on the property to the north do not impact peak flows downstream of the subject lands. 	<p>Comments noted. The construction of roads including their slopes will be in accordance with Town Engineering standards. The reduction of lots is not an option that GWE is considering.</p>

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<p>Is removal of the hill necessary?</p> <p>The plan assumes grading of the property to the north in order to merge with the level planned for location of the new homes.</p> <p>GWCA would note that the land to the north is designated NHS/Protected Countryside Area.</p> <p>- Who has authority to approve such activity and change to the farmland? - Is the Town in favor of such a change impacting on the environment?</p> <p>See section H4.3.13 of the GWSP,</p> <p>H4.3.13</p>	<p>GWCA</p> <p>#13</p>	<p>As noted in the preceding response, the proposed grading changes / cutting of the hill are required to provide a suitable road slope (i.e. to avoid excessively steep slopes within the subdivision) as well as to provide the minimum density of lots required for the zoning requirements.</p> <p>GWCA notes that:</p> <ul style="list-style-type: none"> • Even with the grading proposed, the plan exceeds the approved density level of 5 units per hectare by 40%. • The necessity of removing the hill could be avoided by deleting some of the planned properties e.g. <ul style="list-style-type: none"> o Those numbered as say #4 to #9 o This would also reduce the density to about 5.6 units. o It would also considerably reduce the impact on the environment. <p>The Grading Plan (Figure 3A) assumes grading of the property to the north. Figure 3B (Alternative Grading Plan) shows the proposed grading assuming no works are undertaken to the north. This requires the use of extensive retaining wall.</p> <p>If no dumping is permitted in the property to the north, it also means trucking of about 27,000 additional cubic metres off-site.</p> <p>And option 3B (Alternative Grading Plan) still involves removal of the ridge.</p> <p>The proposed grade changes would take place through the Town's Site Alteration Permit process with the Town being the approval authority.</p> <p>We defer to the Town to respond to the final question.</p> <p>Note the following from section H4.1 of the updated GWSP: H4.1 OVERALL GOAL OF THE SECONDARY PLAN The goal of the Glen Williams Secondary Plan is to protect and preserve the natural and cultural heritage features of the Hamlet and to guide change that maintains and enhances the unique character and natural environment of the Hamlet.</p>	<p>As previously noted, the construction of subdivision roads must meet Town Engineering standards. The project Consulting Engineer has confirmed that the removal of the hill is necessary to facilitate a safe and properly designed public road to meet Town standards. The removal of lots would not resolve this issue.</p> <p>The only requirement through our submission process was the Green Standards Development checklist. Branthaven is preparing this document and we will circulate to the GWCA once it has been finalized.</p> <p>See below for further responses.</p> <p>The subject property was studied in accordance with the Terms of Reference that were approved by the Region of Halton, Town of Halton Hills and Credit Valley Conservation. This included assessing the natural heritage features</p>

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<p>SUSTAINABILITY AND CLIMATE CHANGE See Page 29 of 106</p> <p>The Town of Halton Hills is committed to sustainable growth and development. The Town of Halton Hills sets a goal to be a Net Zero municipality by 2030.</p> <p>In accordance with Section C19 of the Town of Halton Hills Official Plan, to facilitate sustainable development practices, all development applications shall promote energy conservation, water conservation and quality, the natural environment, ...</p> <p>See section H3.8 of the GWSP,</p> <p>3.8 Design Review The Design Review process shall.... The Design Review process shall monitor the realization of the vision for Glen Williams including: • Preservation and promotion of the character of Glen William's built form; • Protection and enhancement of Glen William's open space network and natural environment</p>	<p>We would also point out the following statement from section H4.2 of the updated GWSP:</p> <p>a) ii) providing for limited new growth in designated and planned areas through development that is sensitive to the natural environment and topography of Glen Williams ... and</p> <p>c) To protect natural heritage by i) preserving , protecting and enhancing the Hamlet's natural heritage system,</p> <p>Note:</p> <p>The forested area on the 2nd hill contains 50 – 60 yr. old sugar maples with some well over 100 yrs. old. The Town has stated that it intends to become carbon neutral in a little over 7 ½ years. Such objective will certainly be set back by removing trees and soil.</p> <p>If the development is allowed to encroach on the natural heritage land, there would be in the range of 3,000 years of tree growth removed, just along the fence line! This does not count trees inside the property line.</p> <p>Climate change is real. The future of life on this planet depends on it being addressed. Governments need to do more than talk about it. Removing landforms and trees, not allowing natural drainage but instead draining water away from where it would naturally penetrate are huge factors in the fight against climate change.</p> <p>Removal of hills will add to wind damage. It will destroy micro- climates that some species of plants and insects need to survive. We can not continue to strip away topsoil that takes thousands of years to process and haul it away to bury somewhere.</p> <p>There is no attempt to even address any of these concerns.</p> <p>Note also the Town's stated commitment to the environment:</p> <p>In May 2019, Town Council declared a climate change emergency in Halton Hills. Through adoption of the declaration the Town is committed to taking concrete actions and achieve a net-zero target by 2030.</p> <p>The Town is focusing on corporate and community-wide actions to reduce or remove greenhouse gas (GHG) emissions Effective mitigation can reduce climate change impacts, therefore reducing the level of adaptation required by a community.</p> <p>Similarly, mitigation actions help us to adapt to climate change and to protect and preserve the Town's natural assets and ecosystem. To</p>	<p>on the property consistent with the requirements of the Provincial Policy Statement, Region of Halton and Town of Halton Hills Official Plans and CVC policies. The stand of trees that are referred to in this comment did not meet the Region's criteria for significant woodlands. As a result, there is no policy requirement to maintain these trees as part of the development approvals process. As such, the development is not proposed to encroach onto lands that are considered to be a part of the Region's Natural Heritage System and, in fact, the development has been designed to protect and conserve all Key Features within the Region's Natural Heritage System including woodlands, wetlands and valley lands. The Study Team does recognize however, that there are significant opportunities to plant trees within the newly created buffer areas on the Subject Property as part of the development application.</p> <p>Along with substantial shrub plantings within buffers to the top of bank, wetlands and woodlands on the property.</p> <p>The Study Team will be increasing the density plantings as per CVC's comment.</p> <p>The Study Team is in agreement with the GWCA, climate change is real. As noted above, the supporting studies concluded (and the review agencies agreed) that the treed area in the northwest portion of the site does not meet the Region's criteria for significant woodlands. As such, from a policy perspective, there is no requirement to maintain these trees as part of the development application. With respect to the drainage, in accordance with the approved Terms of Reference, the supporting studies</p>

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	<p>achieve measurable results, the Town has adapted a Low Carbon Resilience Framework.</p>	<p>have demonstrated that the site's water balance will be maintained and the water balance to the adjacent natural features will also be maintained. The agencies responsible for reviewing these studies, to ensure compliance with Provincial, Regional and local requirements, will ensure, through conditions of draft plan approval, that the commitments made within the supporting studies related to stormwater/drainage and natural heritage are implemented.</p>

Glen Williams Estates Inc. (GWE)

GWCA Comments and GWE's Responses

Initial Response			Submission #2 Comments	Response by Developer (GWE)
<p>Need for adequate and timely involvement of the CVCA</p> <p>Also, the CVCA should comment on the proposed grading of land classified as NHS / PROTECTED COUNTRYSIDE AREA. It is difficult to see how grading of prime agricultural land, with attendant destruction of precious topsoil, can conform to a "protected" designation.</p> <p>It is recommended that the Town staff discuss the scope of the planned changes with the CVCA in depth at an early stage in the review to avoid major issues in later stages of the review.</p> <p style="color: red;">At the Mar 31/21 meeting of GWCA with Town staff and GWE, Jeff Markowiak noted that the CVCA had since done a detailed review of the submitted plan and submitted questions.</p> <p style="color: red;">On Dec 9/21, G MacDonald provided copies of the CVCA questions & comments re Submission 1 & 2.</p>	GWCA	#14	<p>Grading would take place through a site alteration permit and would need to conform to the submission requirements of the site alteration by-law. If Greenbelt Plan policies are applicable, Policy 3.2.2 states the following: <i>For lands within the Natural Heritage System of the Protected Countryside, the following policies shall apply:</i></p> <p><i>The full range of existing and new agricultural, agriculture-related and on-farm diversified uses and normal farm practices are permitted subject to the policies of Section 3.2.2.2.</i></p> <p><i>New development or site alteration in the Natural Heritage System (as permitted by the policies of this Plan) shall demonstrate that:</i></p> <p><i>There will be no negative impacts on key natural heritage features or key hydrologic features or their functions; Connectivity along the system and between key natural heritage features and key hydrologic features located within 240 metres of each other will be maintained or, where possible, enhanced for the movement of native plants and animals across the landscape;</i></p> <p><i>The removal of other natural features not identified as key natural heritage features and key hydrologic features should be avoided. [NOTE: The plan to remove the hill at the north does not comply with this intent!] Such features should be incorporated into the planning and design of the proposed use wherever possible;</i></p> <p><i>Except for uses described in and governed by the policies of sections 4.1.2 and 4.3.2,</i></p> <p><i>The disturbed area, including any buildings or structures, of the total developable area will not exceed 25% (40% for golf courses); and</i></p> <p><i>The impervious surface of the total developable area will not exceed 10%; and,</i></p> <p><i>At least 30% of the total developable area will remain or be returned to natural self-sustaining vegetation, recognizing that section 4.3.2 establishes specific standards for the uses described there.</i></p>	<p>The removal of the hill cannot be avoided to accommodate our site grading and meet Town Engineering Standards.</p> <p style="color: green;"><i>The GWCA believes a considerable portion of the removal could be avoided by lowering the density to nearer 5 units per hectare. This could be accomplished by removing some of the homes planned on the north side and hence not having to run the road as much onto the hill area.</i></p>

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GWCA Comments and GWE's Responses

Initial Response			Submission #2 Comments	Response by Developer (GWE)
<p>The hill planned to be removed on the north side of the property contains significant mature trees. Their loss will have a significant environmental impact. Such a change is inconsistent with the Town's stated policy re protecting the environment.</p>	<p>GWCA</p>	<p>#15</p>	<p>This woodland was assessed to determine if it meets the Region's criteria to be considered a significant woodland. It does not meet the minimum size criteria to be considered a significant woodland. The Region has agreed with this analysis.</p> <p>GWCA would point out that:</p> <p>Note:</p> <ul style="list-style-type: none"> • The forested area on the 2nd hill contains 50 – 60 yr. old sugar maples with some well over 100 yrs. old. The Town has stated that it intends to become carbon neutral in a little over 7 ½ years. Such objective will certainly be set back by removing trees and soil. If the development is allowed to encroach on the natural heritage land, there would be in the range of 3,000 years of tree growth removed, just along the fence line! This does not count trees inside the property line. • No amount of tree planting will overcome the environmental impact of removing the ridge and removing the topsoil from the area. Such actions are directly in conflict with the Town's stated policies of addressing climate change. • The planned density of replacement plantings is not adequate as per CVC comment #8 in their Oct 19/21 letter. 	<p>See previous response to Comment #13</p>

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Initial Response		Submission #2 Comments		Response by GWE
The GWCA has significant		Additional Detail #1		Please see the attached memo issued by

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<p>concerns re the thoroughness and reliability of the results from the Traffic Impact Study (TIS) filed by Dorian.</p> <p>Specific GWCA concerns: The development and implementation of Bishop Court Phase 2 will cause additional traffic on Confederation Street similar to the scope for the GWE development. This is not taken into account. See Additional Detail #1 in column 4.</p> <p>A considerable number of citizens question the realism of the estimate of number of vehicles going in and out of the subdivision on a typical weekday e.g. Confederation can expect only 29 vehicles from 34 Homes during peak morning hours?. See Additional Detail #2 in column 4.</p> <p>A considerable number of citizens question the realism of the measure of vehicle speeds for traffic travelling on Confederation. The measures reported do not align with anecdotal evidence. The survey was conducted on only a single day. This is inadequate to get an accurate measure of traffic flows.</p> <p>No mention is made of the truck traffic that will exist during construction and the risks this will create – see notes in Issue #1.</p>	<p>GWCA</p>	<p>#16</p>	<ul style="list-style-type: none"> • As the consultant for both the Dorian development and the Bishop Court development, Glenn Wellings is well aware of the potential impact of Bishop Court development & implementation on the traffic for Confederation Street. HOWEVER, such impacts are not specifically factored into the analysis or conclusions. • See correspondence from: Sarah Ahmed [mailto:sahmed@ptsl.com] Sent: Tuesday, December 10, 2019 9:49 AM To: Pasquini, Alexandria of Town of Halton Hills re the ... Scope of Work <p>Task 2 states.</p> <p>“Task 2 – Traffic Forecasting and Analysis: We will prepare vehicle traffic forecasts for each planning horizon and analysis period. The components of the traffic forecasts will be as follows:</p> <ul style="list-style-type: none"> • Existing (Base Year) – 2020 volumes will be derived from the traffic counts collected in Task 1; • Future Background Volumes for the remaining horizon year of five from the date of the study will be estimated by applying a growth rate to the Existing volumes and adding anticipated trips from nearby approves and in-stream developments. Growth rates and developments to include in the background traffic forecasts will be confirmed with the Town and Region, as outlined in Task 1 “ • The 5 year horizon limit for planning is inadequate when it is known that Bishop’s Court is actively being planned and the site prepared. <p>Additional Detail #2</p> <ul style="list-style-type: none"> • Based on other expensive homes in the Glen, there will likely be a minimum of 2 cars per home and typically both homeowners working. It is more realistic to assume 1.5 cars leaving each home in the morning for a total of say 34 x 1.5 = 51, rather than the 29 assumed in the TIS report. • There will also be traffic for school buses to a number of schools – or additional private car trips. • There will also be delivery vehicles (e.g. couriers, appliance deliveries) on a daily basis. 	<p>our traffic consultant to address GWCA concerns.</p>
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