

# DRAFT OFFICIAL PLAN AMENDMENT NO. 20

Agency Comments and Responses

City of Brockville, ON

May 2022





May 16, 2022

NPG Planning Solutions Inc. are the consultants to the City of Brockville for the Review of the City's Official Plan.

Together with Council, staff, the community, and agencies, we have prepared and released draft Official Plan Amendment No. 20 (released December 2021).

We thank all who have provided comments and feedback to the Official Plan Team. This document provides the feedback/comments received together with the response.

Comments have been reviewed and a response provided. Where revisions are identified, these will be made in the final version of OPA 20 presented to City Council for adoption.

**City of Brockville OPA 20:  
Comments and Responses – Agency Comments  
May 16, 2022**

#	Person or Organization	Description of Issue Raised	Response
1	Councillor Wales	<p>Housing Objectives:</p> <ol style="list-style-type: none"> <li>1) Increase housing availability at the right price point for residents of Brockville. We are seeing growth, some of which is through migration from urban centres. This is an encouraging trend, but it has come sooner than expected and may risk pricing some current residents out of the market. We need an official plan that will help us manage this growth, encourage this growth, and most importantly, ensure that residents of Brockville can continue to live here. New housing stock should reflect the financial realities of the people we are trying to serve by adding that housing stock.</li> <li>2) Secondary suites – the official plan should include concrete measures to encourage more of these dwellings.</li> </ol>	<p>The following has been added to the OP in the draft released for comment:</p> <ol style="list-style-type: none"> <li>1) Section 2.3 Strategic Objective 5: A Focus on Housing Supply and Choice</li> <li>2) Section 3.5.1 Housing addressing housing supply – increasing innovative forms of housing such as secondary suites, streamlined planning process to support housing, expedite affordable housing proposals, partnerships with different stakeholders to ensure affordable and diverse housing choices</li> <li>3) <ol style="list-style-type: none"> <li>i. The OP includes increased density, identified intensification sites, and policies that the identified intensification sites cannot be down designated (i.e. lower density) through a private application.</li> <li>ii. This language is to address compatibility of infill and intensification.</li> </ol> </li> </ol>

#	Person or Organization	Description of Issue Raised	Response
		<p>3) Intensification – higher density and mixed density are needed in several areas of Brockville not currently highlighted in the official plan.</p> <ul style="list-style-type: none"> <li>i. Current language in OP is focused on intensification of downtown and other specific areas.</li> <li>ii. Language in OP about maintaining the character of neighbourhood – I am unsure of the intent behind this language. For example, there are low rise apartment buildings on Windsor Drive, which mostly consists of single-family dwellings. Would a development like that be considered in-character with the neighbourhood?</li> </ul>	
2	Councillor Wales	<p>Transportation Questions:</p> <p>1) We have an active transportation plan, and the Brock Trail is a valued part of our active transportation network. How can</p>	<p>1) Policies have been added to integrate active transportation facilities in private development. Policies have also been added to ensure connection of private development AT facilities to the City’s AT facilities.</p> <p>2) General policies are in the OP related to accessibility; in some instances (e.g. parking) these become zoning</p>

#	Person or Organization	Description of Issue Raised	Response
		<p>we better integrate the active transportation network into our official plan, to ensure active transportation gaps are filled?</p> <p>2) How can we include accessibility as part of the official plan? The plan should work to ensure Brockville is an age-friendly community, with inclusive public spaces and public infrastructure.</p> <p>3) How can we build an efficient public transit system, and how can our land use planning support that goal?</p>	<p>issues. Design of public spaces through the City's infrastructure programs can include accessibility.</p> <p>3) Public transit needs increased density and walkable routes to transit. Both are included in the updated policies in the plan.</p>
3	Councillor Wales	<p>Policy Tools:</p> <p>How do we move from the Official Plan to achieving the desired outcomes in our community? Some of the items above are already in our official plan and have been for some time. What are the policy tools we can use to make the Official Plan a reality? Will suggested tools appear in the plan or in another form alongside the plan?</p>	<p>New policy tools such as the Community Planning Permit System will help with implementation. Additional policies have been added related to housing, density, intensification, active transportation and more.</p>
4A	Paula J Stewart, Leeds, Grenville & Lanark District Health Unit	<p>Suggestions to strengthen the health-promoting and protecting aspects of the Official Plan:</p>	<p>Policies have been added to the Official Plan that address increased tree canopy, species diversity, and use of native species.</p>

#	Person or Organization	Description of Issue Raised	Response
		<p><i>Section 2.3 The City's Planning Goals &amp; Objectives</i></p> <ul style="list-style-type: none"> <li>• A Sustainable, Healthy and Vital City <ul style="list-style-type: none"> <li>□ A: Conserved and Enhanced Natural Environment</li> </ul> </li> <li>• Consider adding the following objectives:</li> <li>• 11. Incorporate vegetation and tree-planting requirements in new, existing, and future developments to increase areas for shade and assist with dissipation of localized heat.</li> <li>• 12. Implement an accessible and convenient community-wide compost program to encourage residents to compost food waste, thereby reducing the City's greenhouse gas (GHG) emissions by reducing food decomposition in garbage dumps.</li> <li>• 13. Value natural infrastructure (e.g., wetlands, soils, trees, etc.) and the economic value they provide with respect to natural storm water collection, water quality, sequestering carbon emissions, improving air quality, reducing localized heat, and preventing flooding.</li> </ul>	<p>Additional policies are included regarding local food as well as community gardens. Community compost facilities are generally a service provided and not specifically a land use.</p> <p>Additional policies in Section 3.4.1.1 Sustainable Neighborhood Development Standards: limiting impermeable surfaces, ensuring trees and landscaping throughout asphalt parking areas, TDM strategies implemented, universal design, streets tree-lined and shaded, promoting energy-efficient development, urban agriculture and local food production have been included.</p> <p>The natural heritage policies have been updated.</p>

#	Person or Organization	Description of Issue Raised	Response
4B	Paula J Stewart, Leeds, Grenville & Lanark District Health Unit	<p>A Sustainable, Healthy and Vital City □ B: Healthy Community</p> <p>Consider adding the following as part of this goal:</p> <ul style="list-style-type: none"> <li>Promote population health through policies that encourage physical activity, decrease the City's impact on climate change, provide equitable access to spaces for recreation and leisure in built and natural environments, preserve and protect the local food system from production to waste management, protect the population from health hazards, and increase opportunities for people to gather and build on the City's sense of community.</li> </ul> <p>Consider editing or adding the following objectives:</p> <ul style="list-style-type: none"> <li>30. Support local food production in neighbouring rural municipalities by buying and consuming local produce <i>and other food products. Ensure equitable access to healthy food for all</i></li> </ul>	Active transportation policies and local food policies have been added throughout the Plan.

#	Person or Organization	Description of Issue Raised	Response
		<p><i>residents through: 1) Attraction of living wage employers; 2) Affordable, safe housing that results in a sufficient percentage of total income to purchase safe and healthy food; 3) Support for the local food system through: i. Protection of agricultural land; ii. Incentives for local food processors including subsidies for certified food handler training; iii. Space and subsidy support for farmers' markets where at least 85-100% of food sold is grown or produced within the local region; iv. Maintenance and use of inspected commercial community kitchens.</i></p> <ul style="list-style-type: none"> <li>• The Food Charter and Municipal Toolkit from the local foodcore LGL coalition provide policy suggestions for prioritizing access to healthy food for all.</li> <li>• 34. Provide, enhance and encourage active transportation options throughout the City. <i>Build a robust, safe active transportation (e.g., cycling, walking, public transit) network to decrease use of motorized</i></li> </ul>	

#	Person or Organization	Description of Issue Raised	Response
		<p><i>vehicles and provide options for healthier transportation.</i></p> <ul style="list-style-type: none"> <li>• 35. Ensure population health is prioritized through land use and other public policies in this Plan by including health considerations in all policies to improve the health of all communities and people at a systemic level.</li> </ul>	
4C	Paula J Stewart, Leeds, Grenville & Lanark District Health Unit	<p>An Economically Strong and Diverse City □ A: Flexible and Adaptable Economy</p> <p>Consider adding the following objectives:</p> <ul style="list-style-type: none"> <li>• 19. Build a robust, safe active transportation (e.g., cycling, walking, public transit) network to increase economic activity and provide more commuting options between key destinations.</li> <li>• Several case studies (e.g., Toronto, New York City, London, CBC News overview) have shown how increasing walking and cycling can increase spending at local businesses.</li> <li>• 20. Attract and retain Living Wage employers.</li> </ul>	<p>Active transportation policies have been included throughout the Plan.</p> <p>Living wage and income distribution are not Official Plan policy matters.</p>

#	Person or Organization	Description of Issue Raised	Response
		<ul style="list-style-type: none"> <li>Income/income distribution is a significant determinant of health.</li> </ul>	
4D	Paula J Stewart, Leeds, Grenville & Lanark District Health Unit	<p><i>Section 3.2.2.2 Transit-Oriented Development</i></p> <p>Consider adding the following as point #5:</p> <ul style="list-style-type: none"> <li>Where appropriate, all new roads are designed as Complete Streets (e.g., multi-use paths, bicycle lanes, safe intersections, traffic-calming measures, improved pedestrian infrastructure, etc.). Complete streets can promote safety for all road users and increase active transportation to allow pedestrians, cyclists, and motorists of all ages and physical abilities to interact and move safely along and across all roads.</li> <li>When road improvements and/or new developments are undertaken, and where appropriate, the City may consider conditions of approval including: <ul style="list-style-type: none"> <li>i. Traffic-calming infrastructure (e.g., speed bumps, curb extensions, street trees, etc.) at strategic</li> </ul> </li> </ul>	Active transportation policies, supporting transit, and integrating private development with active transportation has been incorporated throughout the plan.

#	Person or Organization	Description of Issue Raised	Response
		<p>locations to improve the safety of these roads for pedestrians, cyclists, and motorists.</p> <p>ii. Streetscaping features. Planting trees and installing other amenities (e.g., benches, planter boxes) to create an inviting streetscape to maximize youth-, family-, and age-friendliness of the area. Tree cover is critical for air quality, cooling, aesthetic, traffic-calming, and climate change mitigation purposes. Fruit-bearing trees and planter boxes with edible products (e.g., herbs, cherry tomatoes, etc.) can contribute to the local food system.</p> <p>Supportive infrastructure for active transportation such as bicycle-activated streetlights, pedestrian rest areas, bicycle parking, and bicycle repair stations.</p>	
4E	Paula J Stewart, Leeds, Grenville & Lanark District Health Unit	<p><i>Section 3.2.4.2 Neighbourhood Development Areas or Section 3.4.1 Urban Design</i></p> <p>Consider adding the following as a new point:</p>	<p>The public facilities identified are more typically found in public parks and recreation facilities so they are accessible to all.</p> <p>New community garden policies have been added to the Plan.</p>

#	Person or Organization	Description of Issue Raised	Response
		<ul style="list-style-type: none"> <li>• Conditions for approval of new developments may include the designated parkland including some or all of the following amenities:               <ul style="list-style-type: none"> <li>i. A community garden to encourage increased physical activity, healthy eating, knowledge of the food system, increased mental well-being, and social connections.</li> <li>ii. A splash pad or wading pool to provide a family-friendly recreation option and more equitable access for cooling down during days of extreme heat, especially for community members who may not have access to air conditioning or other cool-down methods.</li> <li>iii. Sufficient shade structures (e.g., trees, built structures) to help prevent heat-related illnesses.</li> <li>iv. A playground with barrier-free components and surfaces to allow for optimal accessibility and natural/adventure play components that encourage challenging play experiences, creativity, and age appropriate risk-taking behaviour.</li> </ul> </li> </ul>	<p>Active transportation policies and private development have been integrated in the updated policies.</p>

#	Person or Organization	Description of Issue Raised	Response
		<p>v. Design standards that support the creation of community hubs to provide opportunities for recreation, social interaction, and a sense of ownership over the space.</p> <p>Consider adding the following as a new point:</p> <ul style="list-style-type: none"> <li>• Conditions for approval of new developments may include the following: <ul style="list-style-type: none"> <li>i. All new roads shall be designed as Complete Streets (e.g., bicycle lanes, multi-use paths, safe intersections, traffic-calming measures, improved pedestrian infrastructure). Complete streets can promote safety for all road users and increase active transportation to allow pedestrians, cyclists, and motorists of all ages and physical abilities to interact and move safely along and across all roads.</li> <li>ii. The proposed development may include a network of continuous active transportation infrastructure</li> </ul> </li> </ul>	

#	Person or Organization	Description of Issue Raised	Response
		(e.g., sidewalks, bicycle paths/lanes) to ensure connectivity between the new development and existing infrastructure.	
4F	Paula J Stewart, Leeds, Grenville & Lanark District Health Unit	<p><i>Section 3.3.1 Locations of Economic Activity</i></p> <p>Consider adding the following, or similar wording, to address the potential for tobacco, alcohol, or cannabis production, processing or retail facilities, as point #6:</p> <ul style="list-style-type: none"> <li>Commercial or industrial facilities that produce, process, or sell tobacco, alcohol, cannabis, or other harmful substances shall be located an appropriate distance from sensitive land uses (e.g., residences or facilities where people sleep, schools, daycares, community centres, outdoor recreation amenities, etc.). A minimum 150 to 300 metre buffer area, or minimum separation distance, between any tobacco, alcohol, or cannabis-related facility or outdoor production area and other sensitive land uses (as defined by the Ontario Ministry of the Environment,</li> </ul>	This has not been added to the Official Plan. The City cannot limit the sale of tobacco, alcohol, or cannabis under the regulations of Ontario.

#	Person or Organization	Description of Issue Raised	Response
		Conservation and Parks) will be required.	
4G	Paula J Stewart, Leeds, Grenville & Lanark District Health Unit	<p><i>Section 3.5.3.1 Parks &amp; Open Space</i></p> <p>Consider adding the following as a new point:</p> <ul style="list-style-type: none"> <li>• When developing, maintaining and improving parks, trails and recreational facilities, consideration may be given to including amenities that improve the health promoting and health protecting features of the space. Considerations may include: <ul style="list-style-type: none"> <li>i. Create a community garden to encourage increased physical activity, healthy eating, knowledge of the food system, increased mental well-being, and social connections.</li> <li>ii. A splash pad or wading pool to provide a family-friendly recreation option and more equitable access for cooling down during days of extreme heat, especially for community members who may not have access to air conditioning or other cool-down methods.</li> </ul> </li> </ul>	Please see comments under 4E.

#	Person or Organization	Description of Issue Raised	Response
		<ul style="list-style-type: none"> <li>iii. Provision of sufficient shade structures (e.g., trees, built structures) to help prevent heat-related illnesses.</li> <li>iv. A playground with barrier-free components and surfaces to allow for optimal accessibility and natural/adventure play components that encourage challenging play experiences, creativity, and age appropriate risk-taking behaviour.</li> <li>v. Design standards that support the creation of community hubs to provide opportunities for recreation, social interaction, a sense of ownership over the space, and Crime Prevention through Environmental Design (CPTED).</li> </ul>	
4H	Paula J Stewart, Leeds, Grenville & Lanark District Health Unit	<p><i>Section 3.6 Minimizing Our Impact on the Environment</i></p> <p>Consider adding the following:</p> <ul style="list-style-type: none"> <li>• In partnership with the Federal and Provincial governments, and the Cataraqui Region Conservation Authority, the City strives to protect</li> </ul>	Updated natural heritage policies have been incorporated including stormwater management policies.

#	Person or Organization	Description of Issue Raised	Response
		<p>natural resources and Natural Heritage Features and functions. It is a priority of the City to ensure the sustainable use of resource assets, to protect and enhance significant natural features and functions, and to reduce the risk to public safety and property from hazards, such as flooding, unstable slopes and human-made hazards. <i>Natural storm water management infrastructure (e.g., wetlands) help build a municipality's resilience to extreme weather events such as flooding or heavy rainfall. While planning for the present and future of the City, the economic value and health benefits provided by the City's existing natural infrastructure will be considered and valued.</i></p>	
41	Paula J Stewart, Leeds, Grenville & Lanark District Health Unit	<p><i>Section 5.2.1 Road System</i></p> <p>Consider adding the following as a new point:</p> <ul style="list-style-type: none"> <li>• Where appropriate, all new roads are designed as Complete Streets (e.g., multi-use paths, bicycle lanes, safe intersections, traffic-calming measures, improved pedestrian</li> </ul>	Active transportation policies, supporting transit, and incorporating appropriate infrastructure design has been included in the Plan update. Enhanced streetscaping and tree canopy policies are also included in the Plan.

#	Person or Organization	Description of Issue Raised	Response
		<p>infrastructure, etc.). Complete streets can promote safety for all road users and increase active transportation to allow pedestrians, cyclists, and motorists of all ages and physical abilities to interact and move safely along and across all roads.</p> <ul style="list-style-type: none"> <li>• When road improvements and/or new developments are undertaken, and where appropriate, the City may consider conditions of approval including: <ul style="list-style-type: none"> <li>i. Traffic-calming infrastructure (e.g., speed bumps, curb extensions, street trees, etc.) at strategic locations to improve the safety of these roads for pedestrians, cyclists, and motorists.</li> <li>ii. Streetscaping features. Planting trees and installing other amenities (e.g., benches, planter boxes) to create an inviting streetscape to maximize youth-, family-, and age-friendliness of the area. Tree cover is critical for air quality, cooling, aesthetic, traffic-calming, and climate change mitigation purposes. Fruit-bearing trees and</li> </ul> </li> </ul>	

#	Person or Organization	Description of Issue Raised	Response
		<p>planter boxes with edible products (e.g., herbs, cherry tomatoes, etc.) can contribute to the local food system.</p> <p>iii. Supportive infrastructure for active transportation such as bicycle-activated street lights, pedestrian rest areas, bicycle parking, and bicycle repair stations.</p>	
4J	Paula J Stewart, Leeds, Grenville & Lanark District Health Unit	<p><i>Section 5.2.3 Parking</i></p> <ul style="list-style-type: none"> <li>• Throughout this section, consider adding bicycle parking requirements, in addition to motor vehicle parking requirements, where appropriate.</li> <li>• Cycling infrastructure, including bicycle racks, can help induce active transportation.</li> </ul>	This has been incorporated.
		<p><i>Section 5.2.4 Public Transit System</i></p> <p>Consider adding the following as point #6:</p> <ul style="list-style-type: none"> <li>• To encourage more active transportation trips, bicycle racks will be added to all City buses.</li> </ul>	The connections between active transportation and transit have been included.

#	Person or Organization	Description of Issue Raised	Response
5	UCDSB, Sarah Crawford	<p><b>School Boards are required to comply with O. Reg. 444/98 of the Education Act when disposing of surplus property.</b> Portions of sections 3.5.2 Community Facilities and 4.3.3 Land Use &amp; Built Form Policies of the City of Brockville’s draft OPA contravene O. Reg 444/98 of the Education Act. Specifically, the portion of the sections that are highlighted below.</p> <p><b>3.5.2 COMMUNITY FACILITIES</b></p> <p>The City shall endeavour to provide adequate community services and facilities to meet the needs of the City’s existing and future residents, businesses and visitors through the provision of adequate opportunities for education, care, parks, open space and recreation, libraries, places of worship, cultural and heritage facilities, health and safety.</p> <p>It shall be the policy of the City that:</p> <p>1. In consultation with the School Boards, the need for new schools shall be identified.</p> <p>Where closure and sale of a school is proposed, the open space component of the</p>	<p>The provisions that are highlighted are within the current Official Plan that was approved by the Minister of Municipal Affairs and Housing approximately ten years ago.</p> <p>The following sentence will be deleted from Policy 3.5.2.1:</p> <p><i>Where closure and sale of a school is proposed, the open space component of the school site may be retained or incorporated in a redevelopment proposal.</i></p>

#	Person or Organization	Description of Issue Raised	Response
		<p>school site may be retained or incorporated in a redevelopment proposal.</p> <p><b>4.3.3 LAND USE &amp; BUILT FORM POLICIES</b></p> <p>6. In addition to the foregoing policies on elementary schools, the following policies shall also apply for public and private elementary schools:</p> <ul style="list-style-type: none"> <li>i. where a vacant school site is not required by a Board of Education or by a private school, and the City has determined that the lands are not needed for recreational purposes, the lands may be developed in accordance with the underlying land use designation without an amendment to this Plan;</li> <li>ii. where an existing school is determined to be surplus to a Board of Education's or a private school's requirements, or is to be relocated, the lands may be developed in accordance with the permitted uses and the policies of this Plan without an amendment to this Plan, provided that the City has determined that the lands</li> </ul>	

#	Person or Organization	Description of Issue Raised	Response
		<p>are not needed for recreational purposes; and,</p> <p>iii. The City shall:</p> <ul style="list-style-type: none"> <li>» review all proposed, vacant and surplus school sites to determine if they are appropriate for recreational uses prior to considering any forms of development on surplus Board of Education lands; and,</li> <li>» require that provisions be included in all subdivision agreements that provide the City with the first right of refusal to purchase proposed school site lands from the proponent where it has been determined by the Board of Education that they are no longer required.</li> </ul> <p>As a result, School Boards would not be able to comply with the aforementioned sections as currently drafted.</p>	

#	Person or Organization	Description of Issue Raised	Response
		<p>If you require additional discussion about addressing this wording to acknowledge the requirement to follow <b>O. Reg. 444/98 of the Education Act when disposing of surplus property, please contact me.</b></p>	
6A	<p>Tamara Tannis, TransCanada Pipelines Ltd.</p>	<p>Proposed Amendments Regarding Utilities</p> <p>Section 5.5 of the proposed Official Plan Amendment contains policies that combine telecommunications land needs with pipeline land needs. The introductory text excludes mention of utilities and speaks only to telecommunications and we would recommend it be amended to include reference to Utilities. We also request that the policies for telecommunications and utilities be distinguished from each other through the creation of two subsections as follows:</p> <ol style="list-style-type: none"> <li>1) 5.5.1 Utilities; and</li> <li>2) 5.5.2 Telecommunications.</li> </ol> <p>This will assist in differentiating the regulatory requirements of the distinct land uses.</p>	<p>The approach in the Official Plan is to integrate telecommunications and utilities policies recognizing that in many instances, but not all instances, the road corridor is shared by both.</p>

#	Person or Organization	Description of Issue Raised	Response
6B	Tamara Tannis, TransCanada Pipelines Ltd.	<p>We request the following revisions under 5.5: (<del>Red</del> – new, <del>striketrough</del> – remove)</p> <p>5.5 Utilities &amp; Telecommunications</p> <p><del>Throughout the City, utilities provide the necessary infrastructure to serve local, regional and national needs. Corridors and rights-of-way for utilities that provide for the transmission of electricity, gas and oil pipeline services shall be protected for existing and projected needs.</del></p> <p>The continual advancement of telecommunications technology, coupled with the need for rapid information transfer, shall have a significant impact on the future development and economic vitality of the City.</p> <p><del>16. Any development proposed to occur over a utility pipeline right-of-way shall be reviewed and approved by the utility provider prior to approval.</del></p> <p><del>17. Permanent structures shall not be permitted on pipeline rights-of-way.</del></p>	<p>The proposed additional wording is not appropriate due to the use of the word “shall”. This could inadvertently place priority on these utilities over other matters such as transit and active transportation. Modified wording as follows will be added:</p> <p><del>Throughout the City, utilities provide the necessary infrastructure to serve local, regional and national needs. Corridors and rights-of-way for utilities that provide for the transmission of electricity, gas and oil pipeline services shall be protected for existing and projected needs.</del></p> <p>Throughout the City, utilities provide the necessary infrastructure to serve local, regional and national needs.</p> <p>Please see Response to Item 6C as well.</p>

#	Person or Organization	Description of Issue Raised	Response
		<p><del>18. The City recognizes that TransCanada Pipelines (TCPL) operates two high pressure natural gas pipelines that traverse the City within a right-of-way. The City and TCPL shall consult each other to determine if any proposed development may impact TCPL's existing or planned rights-of-way. The City shall require early consultation with TCPL or its designated representative for any proposals within 200 metres of its facility.</del></p>	
6C	Tamara Tannis, TransCanada Pipelines Ltd.	<p>TCPL recommends the following replacement and additional policies to be included in the Plan Amendment under the proposed new subsection</p> <p><b>5.5.1 Utilities:</b></p> <p>1. The City recognizes the importance of the high-pressure natural gas pipelines and hydro transmission lines identified on the Plan's Schedules. Any development located within 200 metres of a utility corridor may affect the safety and integrity of the line. The City will require early consultation with the respective Utility agency for any development proposed within 200 metres of a gas pipeline. A minimum setback of 7 metres shall be</p>	<p>Policy edits as follows will be included in the updated draft of the Official Plan:</p> <p><b>5.5.1 Utilities – Additional Policies:</b></p> <ol style="list-style-type: none"> <li>1. The City recognizes the importance of the high-pressure natural gas pipelines and hydro transmission lines identified on the Plan's Schedules. The City will require early consultation with the respective Utility agency for any development proposed within 200 metres of a gas pipeline.</li> <li>2. Activities located on or within 30 metres of a utility pipeline, such as excavations, blasting and any movement of heavy equipment shall <u>may</u> require the necessary approval from the authority having jurisdiction.</li> </ol>

#	Person or Organization	Description of Issue Raised	Response
		<p>maintained from the limits of the utility right-of-way for all permanent structures and excavations. Accessory structures shall have a minimum setback of at least 3 metres from the limit of the right-of-way.</p> <p>2. In addition to the requirements for the above setbacks, the following may need to be setback a minimum of 7 metres from the limit of the pipeline right-of-way:</p> <p>a) road rights-of-way (paralleling pipeline rights-of way), paved private driveways, parking spaces and parking areas; and,</p> <p>b) stormwater management facilities.</p> <p>3. Activities located on or within 30 metres of a utility pipeline, such as excavations, blasting and any movement of heavy equipment shall require the necessary approval from the authority having jurisdiction.</p> <p>4. Throughout any built up areas, the City will encourage the designation of a utility right-of-way for passive parkland or open space</p>	<p>3. Throughout any built-up areas, the City will encourage the designation of a utility right-of-way for passive parkland or open space subject to consultation with the respective utility agency and their <u>any</u> easement rights.</p> <p>Rationale:</p> <p>Some of the specific provisions related to 7 m and 3 m are better suited to a Zoning By-law.</p> <p>Regarding the revisions above in Policy 2, some lands that are south of Centennial Road have development approvals or are to be brought into the urban area. The 30 m provision would include lands on the south side of Centennial under the “shall” terminology. The use of “may” provides appropriate flexibility.</p>

#	Person or Organization	Description of Issue Raised	Response
		subject to consultation with the respective utility agency and their easement rights.	
6D	Tamara Tannis, TransCanada Pipelines Ltd.	<p>In addition to the above, we request that the following Official Plan Amendment Schedules show the TCPL utility corridor and facility lands:</p> <ol style="list-style-type: none"> <li>1. Schedule 1 (Dec 9 2021), “OPA 20 Proposed Changes to Schedule 1” (City Structure);</li> <li>2. Schedule 3 (Dec 9 2021), “Natural Heritage System, Open Space &amp; Constraints”;</li> <li>3. Schedule 4 (Dec 13 2021), “Street Network”; and</li> <li>4. Schedule 6 (Dec 8 2021), “Site Specific Policy Areas.”</li> </ol> <p>We would also recommend amending Schedule 5, Active Transportation Network (Approved by MMAH, Feb 9, 2012) to identify the utility corridor.</p> <p>We can provide a GIS shape file to the City to assist in the mapping of the utility corridor.</p>	The Schedules can be updated. However, we are unable to sign a confidentiality agreement as the information in the shape files would need to be added to the publicly available schedules.

#	Person or Organization	Description of Issue Raised	Response
		A confidentiality agreement will need to be entered into prior to releasing the files. Please let us know if you would be interested in this option.	
		Additional policies related to Open Space land use designations should include references to TCPL's pipeline rights-of-way and the restrictions of uses.	This is captured in the revisions to Policy 5.5.1
7A	Michael Dakin, CRCA	1. Section 1.5.1 Terms Used in Our Plan (pg. 1-29) – The use of the term “flood fringe” is not applicable in the City of Brockville. A single-zone approach to defining the flooding hazard is used in this part of the province (within the Cataraqui Region) rather than a two-zone approach where the flood fringe is applicable. This term could be deleted from the Plan.	1. Noted. The addition of the term “flood fringe” will be deleted from the proposed OPA.
		2. Section 1.5.1 (pg. 1-40) – The definition of the “regulatory floodplain” is not accurate for the waterbodies present in the City of Brockville. The definition should refer to the 1:100 year flood level plus additional factors, including wave uprush for the St. Lawrence River. We recommend the previous definition be kept as it is accurate.	2. Change to definition of “regulatory floodplain” will be deleted from the proposed OPA.

#	Person or Organization	Description of Issue Raised	Response
7B	Michael Dakin, CRCA	<p>3. Section 2.3 Theme 1C Sustained Action in Addressing Climate Change (pg. 2-12) – We recommend adding an objective to speak to the need to consider climate change impacts on natural hazards. We recommend the following as example text: “Ensure that, through the development review process, potential impacts of climate change that may increase the risk associated with development near natural hazards are considered.”</p> <p>4. Section 2.3 Theme 4A Responsive Planning Administration (pg. 2-22/23) – We recommend adding an objective to commit to formal pre-consultation review for development applications including applicable departments, agencies and stakeholders to help inform proponents of requirements and streamline the application submission and review process.</p>	<p>3. The following will be added to proposed OPA:  “Ensure the potential impacts of a changing climate on natural hazards are considered through the development review process.”</p> <p>4. No change recommended. See revised policies 6.4.13 and 6.5 in proposed OPA. The issue has been addressed adequately by proposed changes to these policies.</p>
7C	Michael Dakin, CRCA	5. Section 3.2.3(5)(f) The City’s Urban Area (pg. 3-9) – We recommend adding a reference to natural hazards analysis in subsection 3.2.3(5)(f) as a requirement for a Secondary Plan to expand the Urban Area. Subsection (f) could read: Analysis of natural	5. Change will be made as recommended.

#	Person or Organization	Description of Issue Raised	Response
		heritage features and systems and natural hazards identified in this Plan...	
		6. Section 3.4.1(23)(i) Urban Design (pg. 3-40) – We are supportive of the new policies intended to achieve high-quality landscape design, especially those that promote the incorporation of existing, native vegetation and use of green infrastructure / Low Impact Development approaches. For subsection 23(f), we recommend deletion of the word “significant” in front of vegetation and replacement with the word “native”. We also recommend adding “permeable surfaces” after “native vegetation”. These minor changes will help promote retention of native vegetation and ground cover that provide a multitude of functions including stormwater management and protection of biodiversity.	6. General Comment Noted. For 3.4.1(23)(i) “significant” will be removed and replaced as recommended, except “indigenous” will replace “native”. Permeable surface references will be added.
		7. Section 3.4.1.1(1 & 2) Sustainable Neighbourhood Development Standards (pg. 3-41/42) – We encourage the City and consultant to include a specific reference to Low Impact Development techniques. LID is encouraged for both new neighbourhood development and retrofits to existing neighbourhoods as a means to protect the	7. The first paragraph of Section 3.4.1.1 will be amended as follows:  After “water efficiency” in the first sentence insert “and quality”  After “principles of smart growth” in the second sentence insert “, low impact development techniques”

#	Person or Organization	Description of Issue Raised	Response
		natural hydrologic cycle and downstream water quality and ecological integrity. Staff are happy to assist with example LID text for this and other applicable sections of the Plan.	
		8. Section 3.5.3.1(44)(iii) Parks and Open Space (pg. 3-74) – In an effort to acquire and protect lands that may form part of or expand upon the natural heritage system, the City may wish to consider accepting parkland dedication for lands containing features such as significant woodlands, wetlands and other natural heritage features. There may be instances where passive recreation is appropriate in some of these areas whereas others should be restricted to conservation uses. They City might consider acquiring such lands at a different ratio than otherwise developable lands.	8. The <i>Planning Act</i> permits parkland dedication to a specified maximum rate and does not provide for an increased parkland dedication rate for non-developable lands. The City could establish policies for acquiring such lands in excess of required parkland dedications.
		9. Section 3.6 Minimizing Our Impact on the Environment (pg. 3-78) – We’re fully supportive of the four bullet points added as priorities to the introduction to section 3.6. However, we would suggest the fourth bullet point, relating to natural hazards, is likely a better fit under section 3.7 of the Plan.	9. The 4 <sup>th</sup> bullet will be moved to Section 3.7 as recommended.

#	Person or Organization	Description of Issue Raised	Response
		<p>10. Section 3.6.1 Water Resources – As discussed with the City’s planning consultant at the pre-consultation phase of the Official Plan update, we recommend the City consider adding a policy section within the broader Water Resources section for marine facilities and shoreline alteration on the City’s waterbodies, particularly the St. Lawrence River. Appropriately sized and designed marine facilities are important considerations for minimizing disturbance to the shoreline and riparian lands along waterbodies and for avoiding conflict between neighbouring properties. This is particularly relevant for the City of Brockville, given the historical legacy of shoreline development and site alteration along the riverfront as well experiences with landowner conflict. In particular, we recommend the City consider policies speaking to the general size and location of marine facilities in an effort to avoid these impacts and conflicts. Avoiding conflict between neighbours and marine facility users is particularly important due to the existing regulatory gap for these matters. For example, while CRCA may require permit approval for permanent marine facility structures, our regulation (nor MNRF’s,</p>	<p>10. The following policies on Marine Facilities will be added to Section 3.6.1:</p> <ul style="list-style-type: none"> <li>• The City recognizes that waterbodies, particularly the St. Lawrence River, provide important recreational opportunities for residents and visitors to the City. An appropriate amount of dockage and storage for vessels associated with the recreation and transportation-related functions for waterfront properties in the City is permitted provided such marine facilities are of a type and scale to minimize their environmental, navigational and visualize impacts, subject to other applicable policies of this Plan. The implementing Zoning By-law shall contain detailed provisions regulating the development of marine facilities and provide standards appropriate to different marine facility types including docks, boat ports and boathouses.</li> </ul>

#	Person or Organization	Description of Issue Raised	Response
		<p>DFO's or any other applicable agency) does not pertain to the location of these structures in relation to lot boundaries – which is a major source of conflict in our experience.</p> <p>One particularly positive example of marine facility policies is found in the nearby Township of Leeds and the Thousand Island's Official Plan (section 5.2.2 and 5.2.4). We recommend consideration of applicable policies for Brockville and would be happy to assist in developing these.</p>	
		<p>11. Section 3.6.1 Water Resources (pg. 3-78) – In the first sentence of this section, we recommend revising the wording to: “The City contains two main creeks...” as there are a number of other smaller creeks and watercourses in the municipality.</p>	<p>11. Change will be made.</p>
		<p>12. Section 3.6.1 Water Resources (pg. 3-78) – In the last sentence of the first paragraph of this section, we recommend deleting the word “lake” as there are no lakes in the municipality or downstream from the municipality.</p>	<p>12. Change will be made.</p>
		<p>13. Section 3.6.1(6) Water Resources (pg. 3-79/3-80) – We recommend a re-write of</p>	<p>13. Cross-reference to Section 5.3.5 will be added (see response to comment 31).</p>

#	Person or Organization	Description of Issue Raised	Response
		<p>policy 3.6.1(6) relating to stormwater management. As written, the policy speaks only to “end-of-pipe” stormwater management controls which are known to be problematic, and in some cases in the City, already at or over capacity. The last couple decades have seen a shift in stormwater management with the focus moving from end-of-pipe controls to “at-the-source” controls such as lot level, conveyance and alternative approaches. A greater focus on a green infrastructure / Low Impact Development approach is recommended for the City of Brockville given known issues with water quality and flood risk in the City’s two main creeks and other receiving waterbodies. The Province has prepared draft Low Impact Development guidelines that are expected to come into effect in the near future. It would be prudent for the City to introduce the concept of LID in the Plan and incorporate appropriate policy(ies) to encourage and require consideration of LID approaches for new construction projects and redevelopment of existing sites.</p> <p>Further, CRCA’s role in reviewing site-specific development applications is evolving</p>	<p>Section 5.3.5 of the Official Plan is dedicated to Stormwater Management.</p>

#	Person or Organization	Description of Issue Raised	Response
		<p>in response to resource limitations and refinement of our mandate. It is anticipated in the future that CRCA will focus on watershed-level stormwater management rather than site-specific review. While we will remain a key advisor and resource for the City, residents and the development community, it is important that the City strengthen its own policies to ensure that municipal expectations for appropriate stormwater management are clear.</p> <p>Moving forward, we encourage the City to consider a separate Stormwater Management policy subsection as part of section 3.6 of the Official Plan. This section could speak to the importance of adequate stormwater management given the vulnerability of the City and its surface water features. We recommend this section speak to a watershed-level approach and to the applicable policies in section 2.2.1 of the 2020 Provincial Policy Statement. In addition, as noted above. We strongly recommend specific mention of Low Impact Development, including addition of a definition in the document and discussion of the benefits of this approach. For the discussion regarding a</p>	

#	Person or Organization	Description of Issue Raised	Response
		<p>watershed-level approach, we provide the following example text that the City may consider.</p> <p><b><i>“The impacts from storm water runoff should be considered at the highest level possible. Therefore, the City encourages and supports the preparation of watershed plans and master drainage plans. A watershed plan provides overall management objectives and targets for a watershed, whereas a master drainage plan identifies the necessary storm water management approach to meet targets and specifies methods of stormwater control and outlines the general location and size of stormwater facilities at the sub-watershed level. In the absence of a watershed plan or master drainage plan, the City will consult with the Conservation Authority in response to the circulation of planning applications, as well as on relevant guidelines of the Ministry of the Environment, Conservation and Parks, in establishing and revising storm water design criteria and standards.”</i></b></p>	

#	Person or Organization	Description of Issue Raised	Response
		<p>Additional sources to help draft a stormwater management section include CRCA’s current Environmental Planning Policies (2021); the Province’s draft LID Stormwater Management Guidance Manual (2022), and Credit Valley Conservation’s Low Impact Development Stormwater Management Planning and Design Guide (2010). CRCA staff are happy to assist in the preparation of the recommended SWM policy section.</p>	
		<p>14. Section 3.6.3 Watercourses (pg. 3-82) – CRCA recommends the City strengthen the watercourse policy section, particularly subsection (4) by specifying a minimum development setback of 30 metres alongside the City’s creeks and watercourses in order to achieve appropriate riparian buffer protection. A 30 m setback is currently the “industry standard” and is widely accepted as the minimum effective setback by supporting ecological science. We recognize that there are situations where existing development within the 30 m buffer precludes the reasonable possibility of achieving the full 30 m setback. In these cases, CRCA looks to see that the setback is no further reduced, and where possible, enhancements to the</p>	<p>14. The 30 m riparian buffer is used in Ontario however there are circumstances where a lesser buffer is also used (for example, see policies in the Greenbelt Plan). The policy will be updated to acknowledge the preferred width of 30 m while providing some flexibility.</p>

#	Person or Organization	Description of Issue Raised	Response
		<p>buffer/setback are made to achieve net improvements. This approach is in accordance with section 2.2.1 of the 2020 PPS.</p> <p>We recommend the City consider other municipal policy approaches in the development of strong waterbody protection policies, such as riparian buffers and the “ribbon of life”. We refer the City to the examples provided by the City of Kingston’s ribbon of life policies in their Official Plan (Section 3.9.2) and, for a more local example, the adjacent Township of Elizabethtown-Kitley’s Official Plan (Section 2.23.1(2)(1)).</p>	
		<p>15. Section 3.6.5 Natural Heritage Features &amp; Functions (pg. 3-84) – We appreciate that the City is focusing on coastal wetlands with the specific reference to Coastal Wetlands in the section title. However, coastal wetlands are just one part of the natural heritage system so it is a bit odd and potentially confusing why the title would specifically reference this one feature. With the new text added to recognize coastal wetlands in this</p>	<p>15. “And Coastal Wetlands” will be removed from Section Title.</p>

#	Person or Organization	Description of Issue Raised	Response
		section, we feel the reference in the title can be removed.	
		16. Section 3.6.5 Natural Heritage Features & Functions (pg. 3-84) – In accordance with section 2.1.8 of the 2020 PPS, we recommend the following revision to the (new) second paragraph of section 3.6.5: “The Plan specifically addresses those Natural Heritage Features found or potentially found in the City which the Provincial Policy Statement either prohibits development or site alteration within and adjacent to or requires that no negative impact on the feature or its ecological function be demonstrated:”	16. This change will be made.
		17. Section 3.6.5 Natural Heritage Features & Functions (pg. 3-84) – There is a minor error in the list of natural heritage features. The second feature in item i) should read “Significant Coastal Wetlands”.	17. This change will be made.
		18. Section 3.6.5(10) Provincially Significant Wetlands (pg. 3-86) – We recommend that the third sentence in this policy be revised to reference section 3.6.7, as follows: “In accordance with section 3.6.7 of this Plan, an Environmental Impact Study shall be required	18. This change will be made to 3.6.5 (10), as well as 3.6.5 (26) and (31).

#	Person or Organization	Description of Issue Raised	Response
		<p>for all development proposals within 120 metres of a Provincially Significant Wetland.”</p> <p>This also applies to similar text in policies 3.6.5 (26) and (31). The intent is to direct readers to the more nuanced policies under section 3.6.7 that allow for appropriate scoping of an EIS depending on the nature and scale of the proposal.</p>	
		<p>19. Sections 3.6.5(12) to (23) Significant Habitat of Endangered Species &amp; Threatened Species and Fish Habitat (pg. 3-86 to 3-89) – The federal Department of Fisheries and Oceans (DFO) has produced a document titled “Recommended Guidance for Aquatic Species at Risk Protection” (2014) to help municipalities draft policies for aquatic SAR protection in their Official Plans. We recommend the City and consultant refer to this document (attached) for the update to sections 3.6.5(12) to 3.6.5(23).</p>	<p>19. Policies 3.6.5(12) to (23) will be updated based on materials provided by CRCA from DFO.</p> <p>Add the following policy under Significant Habitat of Endangered Species &amp; Threatened Species in Section 3.6.5:</p> <ul style="list-style-type: none"> <li>• The City recognizes natural heritage features and areas may include waters supporting aquatic species at risk listed in Schedule 1 under the federal <i>Species at Risk Act</i> (SARA), including their residences and critical habitats. In accordance with federal requirements, development and site alteration in locations of such species, waters and habitats identified on the DFO’s aquatic species at risk map shall demonstrate through an EIS the following:</li> </ul>

#	Person or Organization	Description of Issue Raised	Response
			<p>(a) all reasonable alternatives have been considered to reduce and minimize impacts to natural heritage features and ecological functions, and the best solution has been adopted;</p> <p>(b) the proposed development and site alteration activities will not jeopardize the survival, recovery and conservation of species at risk protected in Schedule 1 of the Species at Risk Act, including their residences and critical habitat.</p> <p>The requirement for an EIS also applies if there may be potential impacts that would contravene the federal SARA from activities occurring in areas adjacent to such waters, residences or critical habitats.</p> <p>The requirements for an EIS for such waters or habitats should be developed in consultation with Fisheries and Oceans Canada, and indicate how the project will be carried out to remain in compliance with the Species at Risk Act and other applicable legislation.</p>
		20. Section 3.6.5(26) Significant Woodlands (pg. 3-89) – Similar to comment 18, above,	20. This change will be made.

#	Person or Organization	Description of Issue Raised	Response
		we recommend the first sentence be revised as follows: “Development or site alteration proposed in a Significant Woodland feature illustrated on Schedule 3 shall be subject to the completion of an EIS in accordance with the policies of section 3.6.7 prior to development or site alteration.”	
		21. Section 3.6.5(31) Significant Valleylands (pg. 3-90) – As above, we recommend the first sentence be revised as follows: “Development or site alteration proposed in a Significant Valleyland shall be subject to the completion of an EIS in accordance with the policies of section 3.6.7 prior to development or site alteration.”	21. This change will be made.
		22. Section 3.6.5(34) to (42) Significant Wildlife Habitat and Coastal Wetlands (pg. 3-91/92) – We recommend that these policies be given the respective subheadings of Significant Wildlife Habitat and Coastal Wetlands similar to the rest of section 3.6.5.	22. This change will be made.
		23. Section 3.6.5 Natural Heritage Features and Functions (pg. 3-92) – The City contains a number of non-provincially significant, unevaluated wetlands that are either	23. Revised policies will be included with some caution noted as the provincial mapping is not current and, in some instances, incorrect.

#	Person or Organization	Description of Issue Raised	Response
		<p>identified by available provincial mapping or have been identified through site-specific development review. Since all wetlands provide ecological and hydrologic function, we recommend the City and consultant consider adding policies similar to other natural heritage features (e.g. Coastal Wetlands) to ensure proper assessment is completed prior to development near these features. A corresponding section could be added to 3.6.5 with the subheading Other Wetlands or Unevaluated Wetlands.</p>	
		<p>24. Section 3.6.7(7) Environmental Impact Study Policies (pg. 3-95) – We appreciate and support the City’s effort to allow for scoping of EISs and, as originally written, feel the Official Plan contains appropriate language to provide for this. However, the additional subsections iv) to ix) under 3.6.7(7) raise some concern that may create conflict with the intent of natural heritage protection policies and possible confusion. For example, the use of the term “small scale” is very subjective. Second, the reference to CRCA’s regulated area is not appropriate as a criterion. CRCA regulates development based on proximity to natural hazards</p>	<p>24. In our experience, the criteria included in this section provide clear direction to the municipality and applicants on what can and cannot be scoped regarding an EIS. The policies provided are to establish greater clarity.</p> <p>Small scale is a term used in other parts of the Plan for reference so there is a level of understanding of how that term is used.</p> <p>Identifying that scoping/waiving of an EIS cannot occur within the regulated area confirms the commitments to collaboration with the CRCA.</p> <p>The 15m setback criterion is based on similar policy approaches in Provincial Land Use Plans.</p>

#	Person or Organization	Description of Issue Raised	Response
		<p>features (our regulatory extent and the extent of natural heritage features is not coincident). Our regulation does not specifically pertain to natural heritage features. Lastly, a setback of 15 m or greater as a criterion (per subsection ix) is arbitrary. We recommend removal of the new subsections iv) to ix).</p>	
		<p>25. Section 3.7.1 Natural Hazards (pg. 3-104 to 108) – In accordance with the 2020 PPS, we encourage the City to include a policy in the natural hazards sections that speaks to the need to consider the impacts of climate change on the severity and extent of natural hazards. Recent research has shown the extreme weather conditions and greater water level fluctuations (including higher highs) are anticipated within the next several decades for waterbodies including the St. Lawrence River.</p> <p>In our recent review of other Official Plan updates for municipalities along the Lake Ontario – St. Lawrence River system, we have recommended the following general policy text be added to natural hazard sections: “The City, in consultation with the conservation authority, will consider the</p>	<p>25. No changes made.</p> <p>The PPS provides “<i>Mitigating potential risk to public health or safety or of property damage from natural hazards, including the risks that may be associated with the impacts of a changing climate, will require the Province, planning authorities, and conservation authorities to work together.</i>”</p> <p>The potential impacts of a changing climate that might increase the risk associated with natural hazards should be considered in general when implementing the various policies of this Plan.</p>

#	Person or Organization	Description of Issue Raised	Response
		<p>potential impacts of climate change that may increase the risk associated with natural hazards.”</p> <p>Given the particular vulnerability of sections of the City’s waterfront, we would encourage the City to consider adding additional language, particularly as it relates to the flooding and erosion hazards in the Plan. For example, the following text may be suitable: “The City, in consultation with the conservation authority, will consider the potential impacts of climate change that may increase the risk associated with natural hazards and will apply a precautionary and adaptive approach to natural hazards avoidance. This approach will allow for consideration of increased factors of safety as greater setbacks and standards where conditions warrant and based on the best information available.”</p>	
		<p>26. Section 3.7.1.1(3) Flood Hazards (pg. 3-104/105) - We recommend deletion of the term “minor addition” from the list of exceptions in subsection 3.7.1.1(3). This term is subjective and could conflict with CRCA’s regulatory restrictions under O. Reg. 148/06.</p>	<p>26. Inclusion of “minor addition” is consistent with policy 3.1.4 (b) in the PPS.</p>

#	Person or Organization	Description of Issue Raised	Response
		<p>27. Section 3.7.1.2 Other Hazards (Unstable Soils &amp; Steep Slopes) (pg. 3-106) – We recommend the language in the second sentence of this introductory section better reflect the intent of the PPS as it relates to natural hazards avoidance. For example, a new second sentence could be added and the second revised as follows: “Such areas are generally unsuitable for development. In some circumstances, where the risks are minor and the nature and scale of development is appropriate, development may be considered provided that the existing or potential hazards can be addressed in accordance with accepted engineering and resource management guidelines, practices and techniques, including setbacks from the stable top of bank.”</p>	<p>27. The following change will be made to the introductory section:</p> <p>After “Development of such areas” in the second sentence insert “is generally discouraged but”</p>
		<p>28. Section 3.7.1.2(6) &amp; (7) Other Hazards (Unstable Soils and Steep Slopes (3-107/108) – There are some minor typos and formatting errors in subsections (6), (8) and (9) that should be addressed.</p>	<p>28. Unclear what typos or formatting errors have been identified in 3.7.1.2(6).</p> <p>3.7.1.2(9) will be changed to 3.7.1.2(8)(ii.) and subsequent subsections renumbered.</p>

#	Person or Organization	Description of Issue Raised	Response
7D	Michael Dakin, CRCA	29. Section 4.2.3(10)(i) Land Use & Built Form Policies (pg. 4-6) – Since some of the lands included in the Downtown and Central Waterfront Area are adjacent to or within natural hazard-prone lands (such as the flooding hazard), we recommend that section 4.2.3(10)(i) also specify that development shall be consistent with the policies of section 3.7.1.	29. This change will be made.
		30. Section 4.2.4.1(3)(vi) SSPA - 6 Broad Street and 10 St. Andrew Street (pg. 4-13) – The first bullet under Waterfront Development should be revised to specifically reference development in accordance with section 3.6.1, 3.6.3 and 3.7.1 – all of which are applicable to this site-specific policy area.	30. This change will be made.
7E	Michael Dakin, CRCA	31. Section 5.3.5 Stormwater Management (pg. 5-25 to 28) – CRCA staff commend the City and consultant on the greatly improved	31. A cross-reference in 3.6.1 to this section will be added.

#	Person or Organization	Description of Issue Raised	Response
		<p>Stormwater Management section, particularly the emphasis on green infrastructure / LID. We recommend cross-references between sections 5.3.5 and 3.6.1 given the connection between these two topics. See also the discussion under comment 13, above.</p>	
7F	Michael Dakin, CRCA	<p>32. Section 6.4.1.3(1) Secondary Plan Supporting Requirements (pg. 6-9/10) – Further to comment 13, above, we recommend that a master drainage plan be added to the list of supporting studies under subsection 1. For example, subsection 1(iii) could read: “a master drainage plan and/or stormwater management study;”</p>	32. This change will be made.
		<p>33. Section 6.4.5 Land Division (pg. 6-15 to 6-20) – We recommend that policies be added to both the Draft Plan Approval and Consents sections that discourages or prohibits the fragmentation of natural heritage features and areas through land division and specifies that land division must be in accordance with the Natural Heritage section of the Plan. For example, we recommend the following policy:</p>	33. This change will be made.

#	Person or Organization	Description of Issue Raised	Response
		<p>“Land division through severance or plan of subdivision (or condominium) that has the effect of fragmenting lands within the natural heritage system should not be permitted. The policies of Section 3.6.5 of this Plan must also be addressed.”</p>	
		<p>34. Section 6.4.13(1) Pre-consultation and Supporting Studies, Information and Materials for Development Applications (pg. 6-30/31) – As noted in comment 4, above, we recommend that the City require formal pre-consultation for certain types of development applications, including all draft plans of subdivision as well as official plan and zoning by-law amendments and site plan control applications involving medium to large-scale development proposals.</p>	<p>34. The proposed changes to Section 6.4.13(1) require adequate pre-consultation with the City prior to submission of development applications.</p>
		<p>35. Section 6.4.13(3) Pre-consultation and Supporting Studies, Information and Materials for Development Applications (pg. 6-31) – We recommend adding the following studies to the list in support of the listed applications: Environmental Impact Study; Preliminary Stormwater Management Plan;</p>	<p>35. These will be added but are already covered by xii.</p>

#	Person or Organization	Description of Issue Raised	Response
		Preliminary Grading and Drainage Plan, Natural Hazards Analysis.	
		36. Section 6.4.13(4) Pre-consultation and Supporting Studies, Information and Materials for Development Applications (pg. 6-31) – As above, we recommend adding a Natural Hazards Analysis to the list of studies under subsection 6.4.13(4).	36. This will be added but is covered by xxii.
7G	Michael Dakin, CRCA	37. Schedule 3 Natural Heritage System, Open Space & Constraints – The City and consultant must ensure that the Flood Hazard mapping layer reflects the latest (June 2020) flood plain mapping for Buells and Butlers Creek. This flood plain mapping project was updated with the intent to inform the City’s Official Plan and Zoning By-law. The changes to the mapping layer are not substantial but represent the most current and accurate data and should be incorporated into the Schedule. The City and consultant should contact CRCA GIS staff to assist with this.	37. Noted. The City and Consultant will contact the CRCA GIS staff to assist in updating the Flood Hazard mapping layer.
		38. Schedule 3 Natural Heritage System, Open Space & Constraints – Schedule 3	38. This change will be made. City and/or Consultant will reach out to CRCA for available mapping.

#	Person or Organization	Description of Issue Raised	Response
		<p>does not show the flood hazard along the St. Lawrence River. As witnessed during the high water levels of 2017 and 2019, the St. Lawrence River flood risk is arguably greater than that of the Buells/Butlers system yet is not shown on any mapping. CRCA has available flood plain (1:100 year flood level plus wave uprush) mapping for the St. Lawrence River that we are happy to share. We strongly recommend inclusion of this mapping to accurately reflect flood risk along the City's riverfront.</p>	
		<p>39. Schedule 3 Natural Heritage System, Open Space &amp; Constraints – The extent of some natural heritage features, for example, Significant Woodlands, have been refined since the adoption of the Official Plan. The City may wish to consider some of the more major refinements and reflect these changes in an updated Schedule 3. For example, the extent of the Significant Woodland area north of Parkedale Avenue and west of Stewart Street was refined through the Employment Lands Secondary Plan process in 2016-2017. Review of the supporting studies (e.g. Environmental Impact Study) would illustrate the confirmed extent of this feature in this</p>	<p>39. Noted. Further consultation with CRCA staff will be sought to determine where further changes/refinements should be made to Schedule 3.</p>

#	Person or Organization	Description of Issue Raised	Response
		area. CRCA staff can identify other areas through further consultation where refinements have been made and could be reflected on the Schedule.	