

**SoCtOWN OF HALTON HILLS**  
**Jessica Rahim, Senior Planner – Development Review**  
**RE: Deficiencies in Official Plan and Zoning By-law Amendment Applications – First Submission**  
**DATED: February 13, 2026**

#	Department	Assigned To	Comment	Response:
1	PLANNING	RICE GROUP	The Town has retained consultants to peer review the submitted Lands Need Assessment, Retail Market Study and Agricultural Impact Assessment as we do not have the expertise on staff to review these reports in the detail required for this application. The peer review fees for these studies will be covered by the application fees submitted.	Acknowledged. No Action Items Required.
2	PLANNING	PAUL BROWN & ASSOCIATES	The Town has placed an emphasis and focus on the Premier Gateway area for future employment development to 2051. The Mansewood Area along Regional Road 25 had not been a focus for the Town for future expansion. As such, no municipally initiated Secondary Plan to support the development of the area has been identified. Therefore, should the need for the lands to be included within the urban boundary be established, staff identified through the pre-consultation process that the applications need to consider how the proposed land use permissions and development plan would function comprehensively with surrounding parcels and the broader area. This would include how existing and proposed land uses would interact, studying the drainage catchment area wholistically, the existing road network and possible roadway improvements/expansions to support anticipated traffic impacts, and the broader natural heritage system implications.	Acknowledged. To be addressed in subsequent submissions per discussions with the Town.
3	PLANNING	PAUL BROWN & ASSOCIATES	To date many of the submitted studies have not sufficiently looked beyond the boundaries of the subject lands for staff to be able to properly understand how the redevelopment of this site could be integrated into the existing fabric without potentially impacting the proper planning of the broader area should similar proposals be advanced for abutting parcels.	Acknowledged. To be addressed in subsequent submissions per discussions with the Town.
4	PLANNING	PAUL BROWN & ASSOCIATES	As mentioned in the pre-consultation notes, there are a number of smaller rural residential parcels that immediately surround the site that require consideration as part of the application. Has the applicant evaluated whether these parcels could be included within the Urban Boundary Expansion application? And if they were evaluated, what was the rationale for excluding them?	Acknowledged. To be addressed in subsequent submissions per discussions with the Town.
5	PLANNING	PAUL BROWN & ASSOCIATES	Planning staff's preference is to have the proposed Employment Transition (ET) zone whether for Commercial or Industrial uses clearly defined before bringing a recommendation report to Council.	Acknowledged. Per discussions with the Town, amendments to the draft zoning by-law will be coordinated directly with staff under separate cover.
6	ACCESSIBILITY	RICE GROUP	No Comments or Concerns at this time.	Acknowledged. No Action Items Required.
7	BUILDING	RICE GROUP	Site Servicing is very preliminary at this stage. No comments or concerns at this time.	Acknowledged. No Action Items Required.
8	HALTON CATHOLIC DISTRICT SCHOOL BOARD	RICE GROUP	The Halton Catholic District School Board has no objections. It should be noted that Education Development Charges may apply in accordance with the applicable Education Development Charge By-law and required at the issuance of a building permit.	Acknowledged. No Action Items Required.
9	HALTON DISTRICT SCHOOL BOARD	RICE GROUP	The Board would like to note that Education Development Charges (EDC) may be applied. Below are EDC notes that the applicant should be aware of: <ul style="list-style-type: none"> <li>Education Development Charges (EDC) are payable in accordance with the applicable EDC By-law and are required at the issuance of a building permit. Any building permits that are additional to the maximum unit yield which is specified by the Subdivision Agreement are also subject to EDCs prior to the issuance of a building permit, at the rate in effect on the date of issuance.</li> <li>The Board's 2023 EDC by-law provides a limited number of statutory and non-statutory exemptions. School Boards may not exempt a development from the payment of EDCs unless such a development falls squarely within the terms of an exemption provided under an EDC by-law. To qualify for an exemption, an applicant must submit appropriate documentation confirming the intended purpose of the development. Approval of the exemption will</li> </ul>	Acknowledged. No Action Items Required.

			be subject to verification and compliance with all relevant legislative and regulatory requirements. For more information on EDCs, please reach out to the School Boards.	
10	HALTION REGIONAL POLICE SERVICE	RICE GROUP	No concerns with this proposal as it doesn't interfere with our line-of-sight radio system.	Acknowledged. No Action Items Required.
11	LEGAL	RICE GROUP	No comments at this stage of the application.	Acknowledged. No Action Items Required.
<b>CONSERVATION HALTON</b> <b>Ola Panczyk, Environmental Planner</b> <b>February 6, 2026</b>				
<b>Scoped Subwatershed Study (SSWS)</b>				
#	Topic/Section/Plan	Assigned To	Comment	Response:
1	General	CROZIER	<p>As per the draft Terms of Reference (ToR) and detailed comments below, the Scoped Subwatershed Study (SSWS) is required to characterize regulated watercourses, natural hazards, and wetlands, and provide comprehensive justification and analysis for any proposed management strategies (e.g. hazard and feature alterations) of those regulated features and areas. Any proposed alterations to regulated features and hazards must not result in increased regulatory limits or hazards on adjacent lands.</p> <p>Please note that the SSWS will need to be taken to CH's Board for endorsement to enable CH staff to issue permits for implementing the SSWS management strategies for CH regulated features and hazards.</p> <p>The outstanding information and analyses are required to confirm management strategies and limits of watercourses, hazards, and wetlands, which will inform the boundaries of the developable area on site, land use designations, and zones.</p>	Noted, per the meeting on March 24, the SSWS will be completed at a later stage in support of the west side (Phase 2) of the site.
2	General	CROZIER DILLON GEO MORPHIX	<p>a. The main text of the report should be updated to include all information necessary for the reader to generally understand the study's analysis, key findings, and recommendations without turning to the appendices. For example, adding a table to Section 6.4 that compares pre-development and post-development (with stormwater management 'SWM') flow rates at key nodes would demonstrate that the recommended SWM plan can meet the criteria/objectives identified in Section 6.1 of the report.</p> <p>b. Provide constraints figures for both existing and future conditions hazard limits (flood hazard, staked physical top of bank, stable top of bank, meander belt), 6 metre erosion access allowance, 15 metre regulatory allowance, wetland limits and associated 30 metre regulated area, with topographic information as a background.</p> <p>c. There are several outstanding analyses/details proposed to be provided in the next submission (e.g. future conditions hazard assessments, feature-based wetland water balance assessments, slope stability assessment, etc.). Additional comments will be provided once this information is submitted for review.</p>	<p>a. Please refer to the Hydrologic Modeling &amp; SWM Report for flow information.</p> <p>b. Completed.</p> <p>c. Noted, per the meeting on March 24, the SWS will be completed at a later stage in support of the west side (Phase 2) of the site.</p>
3	3.1.3.4 Wetlands	DILLON	Expand this section to include wetland type, water sources (surface and groundwater), hydroperiod, and sensitivity to hydrologic change. Wetland descriptions do not adequately describe wetland function or hydrologic dependency.	Completed.
4	3.1.2.6 2026 Field Program	DILLON	Incorporate appropriate instrumentation to support assessment of the hydrologic function of wetlands.	Completed.
5	3.1.3.6 Valleylands	DILLON	The physical top of bank on the west side of the creek was not staked during the September 2025 site visit. It was acknowledged by all parties on site that the western limits of the top of bank will need to be staked by CH staff in the future in support of any development proposals west of the creek. Update text and associated figures to reflect this approach.	Acknowledged. No Action Items Required.
6	3.2.2 Hydrologic Modeling Approach	CROZIER	Provide the models as part of the next submission for review. Additional comments may be provided once the models have been reviewed.	The hydrologic model has been provided with the resubmission materials. If not received, please contact Isabelle (iforsyth@cfcrozier.ca).

7	3.3.1 Hydraulic Modeling Approach	CROZIER	<p>a. Provide the models as part of the next submission for review. Additional comments may be provided once the models have been reviewed.</p> <p>b. The Manning's n within the provided model are CH's standard Manning's values and should not be changed without discussion with CH.</p> <p>c. It is understood that the study area will not be expanded to include lands to the west of the subject property. As such, the last bullet point (regarding spill analysis) should be removed.</p>	<p>a. The hydraulic model has been provided with the resubmission materials. If not received, please contact Isabelle (<a href="mailto:iforsyth@cfcrozier.ca">iforsyth@cfcrozier.ca</a>).</p> <p>b. Noted. The Manning's n values within the Site were updated for the cross-sections within the Site only to better represent observed conditions as the model received was indicated to be in draft. The Manning's n values were assigned using CH's standard values. No changes were made to the cross-sections outside the site area.</p> <p>c. Noted, no references made to spill analysis in the updated reports.</p>
8	3.3.2 Existing Conditions Floodplain	CROZIER	CH utilizes the One Zone Concept for floodplain management wherein the entire floodplain is considered the floodway. Remove reference to flood fringe.	Noted. No references are made to flood fringe in the provided Hydraulic Analysis Report.
9	3.3 Flood Hazard	CROZIER	It is understood that the applicant will not be undertaking a spill analysis as the study area is not being expanded to include lands to the west of the subject property. As such, remove all text about spill analysis.	Noted, no references are made to spill analysis in the provided reports.
10	3.5.5 Hydrologic Characterization of Existing Wetland Features	DILLON CROZIER	<p>a. Update this section to account for the wetlands that were identified and staked during the site visit with CH staff on September 19, 2025.</p> <p>b. Update this section once the wetland water balance assessment is completed. Also refer to Comment 10 from CH's letter dated November 24, 2025 on the ToR.</p>	A wetland water balance assessment will be provided when the SWS is resubmitted.
11	5.2 Ecological Function Analysis	DILLON	There is insufficient information to review the proposed alterations to regulated features and hazards. Refer to Comment 1 as well as comments throughout this letter as it relates to the information required for CH to review the proposed alterations to regulated features and hazards and update this section accordingly.	These comments have been addressed as part of the NHE, see the NHE comments for the responses.
12	5.3.1 Relocated Wetlands and 5.3.2 Realigned Wetlands	DILLON	<p>There is insufficient information to review the proposed wetland relocation and wetland realignment. At a minimum, in the next submission, the following information is required for CH to review the proposal:</p> <p>a. Provide justification for the proposed wetland management strategy including consideration for alternative approaches and locations for relocation and realignment of wetlands</p> <p>b. Demonstrate that the area for relocation/realignment is suitable to maintain the hydrologic function of relocated/realigned wetlands, including consideration for soil hydrology, surface and groundwater drainage, etc.</p> <p>c. Demonstrate the relocation/realignment is outside of the proposed flood plain alteration (e.g., is located outside of the proposed cut)</p> <p>d. Provide supporting figures that delineate the existing and proposed wetland limits, plus existing and proposed regulation limits</p> <p>Demonstrate the relocation/realignment will not result in increased regulatory limits on adjacent lands</p>	These comments have been addressed as part of the NHE, see the NHE comments for the responses.
13	5.5. Buffers and Setbacks	DILLON	<p>a. Update text to include floodplain and the associated 15 metre regulatory allowance.</p> <p>b. CH regulates 30 metres from the limit of wetlands. Based on CH policies:</p> <ul style="list-style-type: none"> <li>For wetlands less than 2 hectares in size, CH has policies that may allow for the proposed development activities within 15-30 metres of the wetlands, subject to a wetland water balance;</li> <li>For wetlands greater than 2 hectares in size, CH does not have policies that may allow for the proposed</li> </ul>	These comments have been addressed as part of the NHE, see the NHE comments for the responses.

			<p>development activities within 30 metres of the wetland.</p> <p>As the subject property includes and is adjacent to wetlands greater than 2 hectares in size, update this section and modify the concept plan accordingly. As CH staff can only issue permits that meet CH's Board-approved regulatory policies, any reduction in wetland development setbacks (e.g. the current proposed 15 metre setback from wetlands greater than 2 hectares) would require approval from CH's Board. A comprehensive wetland water balance assessment would be required to demonstrate that the wetland development setbacks proposed within the OPA and ZBA would not interfere with the wetlands or negatively impact the hydrologic functions of the wetlands. This analysis would be required for CH staff to review as part of the SSWS.</p> <p>c. While there is insufficient information to review the proposed alterations to regulated features and hazards, please be advised that, if alterations can ultimately be permitted, CH regulatory limits will apply from realigned and relocated features and hazards. Any alteration, relocation, or realignment must not result in an increase in regulatory limits or hazards on adjacent lands.</p>	
14	5.6.1 Preliminary Concepts and Bankfull Channel Dimensions for the Proposed Realignment of Reach N-2-Da	CROZIER SOIL ENG	<p>a. Comprehensive technical analysis is required in support of the proposed watercourse and flood plain alteration. Please also see Comment 21 for further details on the proposed flood plain alteration.</p> <p>b. Provide analysis for the proposed watercourse realignment, and demonstrate the following:</p> <ol style="list-style-type: none"> <li>i. Maintenance of flood conveyance (no increase in off-site flood elevations) and flood storage (storage-discharge relationships for a range of rainfall conditions).</li> <li>ii. No adverse impacts on fluvial processes (including the 1:100-year meander belt width).</li> <li>iii. Geotechnical issues are adequately addressed.</li> </ol> <p>The level of analysis completed should be sufficient to support the limits of the proposed designations and zones, as well as the developable area on site.</p> <p>c. Any watercourse alteration will be required to use natural design, to the maximum extent possible.</p> <p>d. Watercourse and hazard alterations cannot increase regulatory limits or hazards on adjacent lands. Provide existing and proposed hazard limits for confirmation. This also applies to the proposed wetland realignment associated with the proposed watercourse alteration.</p> <p>e. As part of the outstanding comprehensive justification and analysis, provide an assessment of alternatives to realigning Reach N-2-Da (e.g. remediation in-situ or do nothing, etc.).</p>	<p>a. Noted. (The watercourse realignment is not proposed as part of this submission.)</p> <p>b. Not applicable. (The watercourse realignment is not proposed as part of this submission.)</p> <p>c. Noted.</p> <p>d. Noted. Refer to the Hydraulic Analysis Report for the floodplain limits.</p> <p>e. Not applicable. (The watercourse realignment is not proposed as part of this submission.)</p>
15	5.6.3 Wetland Replication	DILLON	Refer to Comment 12.	These comments have been addressed as part of the NHE, see the NHE comments for the responses.
16	6.1 Stormwater Management Criteria – Water Balance	CROZIER	Update text within the 'Water Balance' section, as it currently states that a risk assessment will be completed to determine if a feature-based wetland water balance is required. Refer to CH's letter dated November 24, 2025 on the ToR for detail.	The SWM criteria has been updated accordingly in the Hydrologic Modeling & SWM Report.
17	6.1.1 Downstream Impact Assessment – Feature Specific Water Balance	CROZIER	Once the feature-based wetland water balance assessment is completed, update this section to identify and include discussion on impacts to wetland hydrologic function and hydroperiod.	A wetland water balance will be provided when the SSWS is resubmitted.
18	6.2 Stormwater Management Strategy And 6.4 Quantity Control	CROZIER	<p>a. Consider consolidating Section 6.4 into Section 6.2 as quantity control is part of the stormwater strategy. Alternatively, Sections 6.3 through 6.5 should be subsections of Section 6.2 (for example Section 6.2.1 and so on)</p> <p>b. Add the following tables and text from Hydrologic Modeling and Stormwater Management Report located in Appendix</p>	a. Not applicable at this time (not resubmitting the SSWS with this submission).

			<p>C:</p> <ul style="list-style-type: none"> <li>i. Table 3: Pre-Development and Post-Development Uncontrolled Flow Summary and associated discussion.</li> <li>ii. Table 4: Site Allowable Release Rates and Storage Requirements and associated discussion.</li> <li>iii. Table 5: Existing and proposed uncontrolled Regional Flow Comparison and associated discussion.</li> </ul> <p>c. Based on Table 5 in Appendix C, the percent increase in the Regional Storm flows are very small (0.01% to 1.2%). Regional Storm controls may not be required if there are no downstream impacts. CH suggests that the study should:</p> <ul style="list-style-type: none"> <li>i. Assess if the increases seen in the regulatory storm flow rates pose a risk to human health, safety and property;</li> <li>ii. Assess a full range of options to mitigate any risks; and</li> <li>iii. Use the proposed regulatory storm quantity control criteria only if it is determined that regulatory storm controls are the most appropriate means to mitigate the risks.</li> </ul> <p>d. If regulatory storm control ponds or tanks are required to mitigate impacts to downstream flood flows used in land use planning and regulatory flood hazard mapping, CH recommends either public ownership of the facility or demonstration by the municipality that sufficient mechanisms are in place to ensure the proper operation and maintenance of a privately-owned facility. Provide details on the proposed ownership and/or process agreed to with the Town of Halton Hills.</p> <p>e. Surface storage (i.e., rooftop/parking lot storage) for the regulatory storm event will not be reflected in future regulatory storm flood hazard mapping until such time that the use of these types of controls for extreme storm events is supported through clear Provincial direction and/or a comprehensive watershed approach is established between CH and its watershed municipalities.</p>	<ul style="list-style-type: none"> <li>b. Not applicable at this time (not resubmitting the SSWS with this submission).</li> <li>c. Noted. No regional controls are deemed required with the updated analysis. Refer to the Hydrologic Modeling &amp; SWM Report for more details.</li> <li>d. Not applicable (no regional controls are deemed required).</li> <li>e. Not applicable (no regional controls are deemed required).</li> </ul>
19	6.3 External Flow Conveyance	CROZIER	<ul style="list-style-type: none"> <li>a. CH recommends that the external flows be conveyed in a swale and outlet as close as possible to the location of the existing HDF outlet into the valley to avoid an additional outlet and increased erosion within the valley system.</li> <li>b. A permit from CH will be required for the proposed outlet and will be reviewed under CH policy. Comments on the proposed outlet will be provided once details are submitted. As the outlet is proposed within the regulated area adjacent to a wetland, it will need to be demonstrated through the feature-based wetland water balance assessment that there will be no negative impact to wetland form and function. Update text to reflect this.</li> </ul>	<ul style="list-style-type: none"> <li>a. This will be addressed at the time of the SSWS resubmission for the full buildout of the property.</li> <li>b. Noted. A wetland water balance will be provided when the SSWS is resubmitted.</li> </ul>
20	6.6 Low Impact Development Opportunities	CROZIER	Once the wetland water balance assessment is completed, identify and include discussion of mitigation measures that explicitly address wetland hydrologic function and hydroperiod.	Noted. This will be provided when the SSWS is resubmitted.
21	Hydraulic Assessment, Future Conditions Floodplain and Downstream Capacity Analysis	CROZIER	<ul style="list-style-type: none"> <li>a. Provide analysis for the proposed floodplain alteration, demonstrating: <ul style="list-style-type: none"> <li>i. Maintenance of flood conveyance (no increase in off-site flood elevations) and flood storage (storage-discharge relationships for a range of rainfall conditions).</li> <li>ii. No adverse impacts on fluvial processes (including the 1:100-year meander belt width).</li> <li>iii. Geotechnical issues are adequately addressed.</li> </ul> <p>The level of analysis completed should be sufficient to support the proposed limits of the designations and zones, as well as the developable area on site.</p> </li> <li>b. Flood plain alterations cannot result in increased regulatory limits or hazards on adjacent lands. Provide existing and proposed hazard limits for confirmation.</li> <li>c. Show the areas where the proposed cut and fill will take place on a figure, including volumes of the cut and fill.</li> </ul>	<ul style="list-style-type: none"> <li>a. The floodplain alterations are limited to support the development of Phase 1 only at this time. Cut/fill within the floodplain remain outside the meander belt and stable top of slope. Refer to the Hydraulic Analysis Report for more details.</li> <li>b. Noted. Refer to the floodplain figures for existing conditions and Phase 1 included in the Hydraulic Analysis Report.</li> <li>c. The requested figure is included in the Hydraulic Analysis Report.</li> <li>d. Noted.</li> </ul>

			d. Section 8.0 indicates that the compensating cut associated with the proposed floodplain alteration will be provided on the opposite side of the tributary, which is also the same area where wetland relocation is proposed. Notwithstanding the issues associated with the area proposed for wetland relocation, please be advised that the proposed cut cannot overlap with the proposed wetland relocation/replication area as the wetland is presumed to be full in the regulatory flood mapping Regional Storm event based on antecedent conditions and rainfall. Modify plans accordingly.	
22	9.2 Slope Stability Assessment	SOIL ENG	A slope stability assessment was not provided in this submission. Ensure that the slope stability assessment refers to Conservation Halton Guidelines for Slope Stability Assessments for Valleys.	A slope stability assessment in accordance to Conservation Halton policies is presented as part of the submission; however, the submission does not include the future Employment Land where the slope stability assessment is required.
23	11 – Monitoring and Adaptive Management Program	DILLON	Refer to Comment 15 from CH’s letter dated November 24, 2025 on the ToR.	These comments have been addressed as part of the NHE, see the NHE comments for the responses.
<b>Appendix C – Hydrologic Modeling and Stormwater Management Report</b>				
<b>#</b>	<b>Topic/Section/Plan</b>	<b>Assigned To</b>	<b>Comment</b>	<b>Response:</b>
24	2.2 Proposed Drainage Condition	CROZIER	The report does not include the proposed realignment of Reach N-2-Da. Additional comments may be provided once the proposed realignment is included in the next submission.	Noted.
25	3.1 Existing Condition Modeling and 3.2 Proposed Condition Modeling	CROZIER	The proposed model updates and methodology discussed in the report appear acceptable. However, as the models were not provided in this submission, CH may have additional comments once the models are reviewed as part of a subsequent submission.	Noted. The models have been provided with the resubmission materials. If not received, please contact Isabelle (iforsyth@cfcrozier.ca).
26	4.2 Stormwater Strategy	CROZIER	CH notes that surface storage (i.e., rooftop/parking lot storage) for the regulatory storm event will not be reflected in future regulatory storm flood hazard mapping. See comment 18.d for a more detailed discussion.	Noted.
27	4.3.1 Regional Storm Analysis	CROZIER	Based on Table 5, the percent increase in the Regional Storm flows are very small (0.01% to 1.2%). Regional Storm controls may not be required if there are no downstream impacts. See Comment 18.c above for more detailed discussion.	Downstream impacts have been reviewed and it was determined that no Regional controls are required. Refer to the Hydrologic modeling & SWM Report and the Hydraulic Analysis Report for more details.
28	5.1 Site Water Balance and Wetland Feature-Base Water Balance	CROZIER	Refer to Comment 11 from CH’s letter dated November 24, 2025 on the ToR.	Noted.
<b>Appendix G – Fluvial Geomorphology Assessment and Critical Redside Dace Habitat Delineation</b>				
<b>#</b>	<b>Topic/Section/Plan</b>	<b>Assigned To</b>	<b>Comment</b>	<b>Response:</b>
29	7 Preliminary Requirements for Realigned Reach N-2-Da	GEO MORPHIX	As part of the outstanding comprehensive justification and analysis, provide an assessment of alternatives to realigning Reach N-2-Da (e.g. remediation in-situ or do nothing, etc.).	Justification and analysis for the potential realignment will be provided as part of the SSWS resubmission at a later date, as appropriate.
<b>Servicing and Stormwater Management Report</b>				
<b>#</b>	<b>Topic/Section/Plan</b>	<b>Assigned To</b>	<b>Comment</b>	<b>Response:</b>
30	General	CROZIER	Refer to comments on the SSWS and update report accordingly.	Noted.

31	General	CROZIER	Provide the models as part of the next submission. Additional comments may be provided once the models have been reviewed.	Noted, the model is provided with this submission. If not received, please contact Isabelle (iforsyth@cfcrozier.ca)
32	4.0 Stormwater Management	CROZIER	Regional Storm control may not be required for this site (see Comment 18.c above). Confirm criteria in the Scoped SWS and update text as needed.	Downstream impacts have been reviewed and it was determined that no Regional controls are required. Refer to the Hydrologic modeling & SWM Report and the Hydraulic Analysis Report for more details.
33	5.0 Erosion and Sediment Control	CROZIER	The proposed erosion and sediment control methodology discussed in the report is generally acceptable. CH will provide more fulsome review and comments for works within our regulated area once detailed erosion and sediment control plans are submitted at the detailed design / engineering stage.	Noted.
<b>Preliminary Natural Heritage Evaluation</b>				
#	Topic/Section/Plan	Assigned To	Comment	Response:
34	5.5.2 Wetlands	DILLON	Refer to Comment 3.	Section 5.5.2 has been updated to include a summary table (Table 8) of wetland features within the Subject Property.  More detailed information has been provided in the Wetland Study Memo (Appendix E).
35	5.5.4 Valleylands	DILLON	Refer to Comment 5.	Section 5.5.4 was updated to note the following:  During the site visit, agency and Dillon staff reviewed the top of bank along the western side of the watercourse. It was agreed at the time that the top elevation line associated with the physical top of bank would be representative as the top of bank in the constraint mapping. A tie-in point was staked and used as a reference to estimate the top of bank based on the top elevation line. Upstream of the tie-in point, it was agreed that the watercourse transitioned to an unconfined feature (i.e. Reach N-2-Da).  The OLS drawing and associated CAD has been included as part of this submission package
36	7.0 Proposed Works	DILLON	There is insufficient information to review the proposed alterations to regulated features and hazards. Please refer to comments on the SSWS and update accordingly.	A Wetland Study Memo has been provided in Appendix E based on the guidelines provided by CH to address this comment. This section has been updated to reference the Wetland Study Memo.

37	8.0 Impact Assessment (8.0 - 8.2.)	DILLON	Update the impact assessment to reflect the results of the feature-based wetland water once it has been completed.	The feature-based water balance will be provided as part of future studies for the Phase 2 development such as a Scope Subwatershed Study and/or a Secondary Plan.
38	8.1.1 Diversion of Aquatic Contributing Habitat	DILLON	Refer to Comment 14 e.	This section has been removed.
39	9.0 Mitigation and Opportunities for Enhancement and 9.1 Restoration Plan	DILLON	There is insufficient information to review the proposed alterations to regulated features and hazards. Please refer to comments on the SSWS and update accordingly.	This section has been updated to reflect only Phase 1 of Subject Property. The Wetland Study ( <b>Appendix E</b> ) discusses the proposed wetland removals in detail.
40	9.2 Natural Heritage Buffers	DILLON	<ul style="list-style-type: none"> <li>a. Refer to Comment 13.</li> <li>b. Update text to include meander belt and the associated 15 metre regulatory allowance.</li> </ul>	<p>This section has been updated to provide a summary table of the preliminary buffers for Phase 2. These buffers will be refined and confirmed as part future studies for the Phase 2 development such as a Scope Subwatershed Study and/or a Secondary Plan.</p> <p>The Wetland Study (<b>Appendix E</b>) discusses the proposed wetland removals and compensation in detail.</p>
41	10 Summary	DILLON	Once the outstanding information and technical analyses are provided and updated to address CH comments, update this section.	Section 10 of the NHE has been updated.
42	Figure 3 and 4	DILLON	A portion of the wetland between N-2-Da and N-2-D is shown as “wetland identified through ELC”. Update linework and text accordingly as this portion of the wetland was staked during the September 2025 site visit.	<p>Staked wetland limits have been shown on these figures. The interior wetland was not staked as it was discussed on site that they can be represented by the ELC limits since they were interior to the floodplain and/or dripline limits.</p> <p>The OLS drawing and associated CAD has been included as part of this submission package.</p>
43	Figure 5	DILLON	<ul style="list-style-type: none"> <li>c. Include the stable top of bank and associated 15 metre regulatory allowance.</li> <li>d. Refer to Comment 42.</li> <li>e. Include the wetland from the adjacent property (as shown in Figures 2 and 3) and associated 30 metre regulated area.</li> <li>f. Update text in legend to read “Proposed Wetland Removal”.</li> </ul>	This figure (updated to Figure 6) has been updated to include the requested information.
44	Figure 6	DILLON	<ul style="list-style-type: none"> <li>g. This figure illustrates the proposed alterations to regulated features and hazards. While there is insufficient information to review the proposed alterations to regulated features and hazards, staff note the following: <ul style="list-style-type: none"> <li>i. Any relocation and realignment must not result in an increase in regulatory limits on adjacent lands. The area currently identified for the proposed wetland restoration would not be supported as it increases regulatory limits on adjacent lands.</li> <li>ii. The wetland restoration area cannot be located within the proposed cut (see Comment 21.d).</li> <li>iii. All proposed hazard limits must be shown (e.g. proposed meander belt regulatory allowance on the south side</li> </ul> </li> </ul>	This figure (updated to Figure 7) has been updated. The proposed compensation options are conceptual and will be confirmed through future studies for the Phase 2 development such as a Scope Subwatershed Study and/or a Secondary Plan. The compensation requirements are discussed in the Wetland Study ( <b>Appendix E</b> ).

			<p>of the creek is missing).</p> <p>iv. The location of the proposed cut must be shown.</p> <p>v. The proposed flood hazard limits must be supported by associated modelling.</p> <p>h. Other comments:</p> <p>i. See Comment 42 and 43.</p> <p>ii. Provide an updated drawing with greater legibility for review.</p>	
45	Other	DILLON	i. Provide digital shapefiles for the wetland staking completed in September 2025.	The OLS drawing and associated CAD has been included as part of this submission package
<b>Conceptual Site Plan</b>				
<b>#</b>	<b>Topic/Section/Plan</b>	<b>Assigned To</b>	<b>Comment</b>	<b>Response:</b>
46	General	TURNER FLEISCHER	Please update this drawing once analysis and delineation of CH's regulated area is updated based on the comments within this letter.	Updated site plan is included with the resubmission.
<b>Planning Justification Report</b>				
<b>#</b>	<b>Topic/Section/Plan</b>	<b>Assigned To</b>	<b>Comment</b>	<b>Response:</b>
47	General	PAUL BROWN	<p>a. As noted throughout this letter, CH has outstanding comments regarding natural hazards, wetlands, and stormwater management. Once the technical studies have been updated to address CH comments, the planning justification report should be updated to reflect the results of those studies (e.g. Section 5.2, etc.). The report should include a section on the Conservation Authorities Act and Ontario Regulation 41/24, and assess how the proposal meets CH policies.</p>	Noted.
48	Policy Analysis	PAUL BROWN	b. Discuss the application's consistency with the Natural Hazards section of the PPS.	Noted.
<b>Schedules</b>				
<b>#</b>	<b>Topic/Section/Plan</b>	<b>Assigned To</b>	<b>Comment</b>	<b>Response:</b>
49	General	PAUL BROWN	CH generally recommends that CH-regulated lands be zoned accordingly and placed into public ownership where appropriate. As such, we recommend that the regulated areas, as confirmed through the requested updates, be incorporated into the applicable OP designations (e.g. NHS, key features, etc.) and zones (e.g. EP1).	Noted.
<b>Preliminary Landscape Plans</b>				
<b>#</b>	<b>Topic/Section/Plan</b>	<b>Assigned To</b>	<b>Comment</b>	<b>Response:</b>
50	General		CH will review and comment on the landscape plans once the SSWS has addressed the above noted comments.	Noted.
<b>TOWN OF HALTON HILLS – DEV ENG</b>				
<b>Reece D'Souza – Supervisor of Development Engineering</b>				
<b>February 10, 2026</b>				
<b>#</b>	<b>Category</b>	<b>Assigned To</b>	<b>Comment</b>	<b>Response:</b>
1	SSWS & Stormwater Management Comments	CROZIER	A peer review of the SSWS was not completed as part of the first submission review and will be required as part of the second submission. The peer review was deferred because the submitted study is missing key information that is acknowledged in the report as being provided in the second submission. The SSWS peer review requirements, including scope, administration, and the funding approach, will be confirmed through further discussions between the applicant and Town staff in advance of and/or following receipt of the second submission.	Noted, per the meeting on March 24, the SSWS will be completed at a later stage in support of the west side (Phase 2) of the site.
2	SSWS & Stormwater Management Comments	CROZIER	As part of the peer review identified in comment 1, stream classification, hydrogeological, and fluvial geomorphology components, including reach removals or realignments such as N-2-D2 and N-2-Da, have not been assessed by Engineering staff as these matters fall outside of our technical expertise. These items will require review by a qualified professional peer reviewer on behalf of the Town.	Noted.

3	SSWS & Stormwater Management Comments	CROZIER	A typical SSWS functions as an overarching technical study that establishes the stormwater management approach and evaluates feasible options rather than advancing refined site-specific design. We recognize that this process is unique, and that this SSWS is intended to be more comprehensive than a typical SSWS by also incorporating elements that would normally be addressed through a Subwatershed Impact Study (SIS), including refinement of catchments and site-specific considerations. The next submission must clearly identify and discuss the required types of controls, outline approximate storage needs, describe public and private infrastructure concepts, and provide a clear options analysis with supporting technical justification. Further refinement of the preferred direction may be discussed within this comprehensive study. Detailed design proposals, final sizing, and detailed calculations are to be provided in the future Stormwater Management Implementation Report once the SSWS approach is confirmed and approved. The Terms of Reference for the study have not yet been approved. Based on the intended scope described above, the Terms of Reference must be updated and expanded as necessary to reflect these requirements. The revised Terms of Reference are to be provided to the Town in advance of the next submission for review and approval.	Note, the SSWS is not being resubmitted at this time, and therefore a ToR is not required. The Hydrologic Modeling & SWM Report provides a high-level description of the proposed SWM system including the proposed controls and storage needs. Further details will be provided at the Site Plan Application stage.
4	SSWS & Stormwater Management Comments	CROZIER	The Area Transportation Plan (ATP) has not been provided, and the current submission does not evaluate its implications for stormwater management or public infrastructure. The SSWS must maintain existing drainage patterns from adjacent lands, ensure that runoff from lands under separate ownership is conveyed through municipal infrastructure, and reflect any future road or corridor improvements identified through the ATP once it becomes available. Any stormwater infrastructure modifications that may trigger CLI ECA requirements must be identified, with confirmation of how these will be addressed (i.e. Ponds, MTDs, Third pipes, LIDS, Flood conveyance channels, Pipes, Outlets etc.) in future submissions. Staff note that 5 Sideroad is under joint jurisdiction between the Town of Halton Hills and the Town of Milton, and Milton will be circulated for comments on any impacts to this roadway.	Not applicable at this time. This will be addressed when resubmitting the SSWS.
5	SSWS & Stormwater Management Comments	CROZIER	External drainage must be conveyed through infrastructure that is accessible and in municipal ownership to ensure long term functionality. The current design proposes buried pipe systems for portions of the northern external drainage. While piping may be appropriate for minor system flows, the Town requires that the major system be conveyed overland, typically through a drainage channel or similar surface route. This requirement applies to all external drainage (i.e. EXT1, EXT2, EXT3, and EXT4). The required ATP has not been provided, and the SSWS must reflect and confirm how external drainage will be accommodated once the ATP is available. The next submission must identify the major system routing for both on site and external catchments and demonstrate how the flows reach a safe and sufficient outlet with these considerations in mind. Refined system design and final sizing can be addressed in the future Servicing and Stormwater Management Report once the SSWS approach is confirmed.	The resubmission focuses on the development of Phase 1 only. A swale is proposed along the north property line to convey minor external drainage towards the undeveloped Phase 2 lands. Further discussion related to the management of external drainage when considering the full buildout of the property will be included when resubmitting the SSWS.
6	SSWS & Stormwater Management Comments	CROZIER	The main body of the SSWS would benefit from clearer summary information to support review of the overall stormwater management approach. Key technical details are currently contained in appendix materials provided as separate supporting reports. The next submission should summarize key information, including but not limited to the required controls, preliminary storage needs, outlet considerations, and quantity, quality, and erosion requirements, within the SSWS report body, with direct references to the relevant appendix reports, sections, tables, and figures.	Not applicable (SSWS not being resubmitted at this time).
7	SSWS & Stormwater Management Comments	CROZIER	Although a response was provided in a ToR response matrix, add a section in the SSWS that outlines the rationale for not including the tributary west of the site in the analysis. Documenting the assumptions and confirming that the tributary does not affect site hydrology or downstream conditions will help ensure the study area and decisions are clearly understood.	The requested information will be included in the SSWS at the time of resubmission.
8	SSWS & Stormwater Management Comments	CROZIER	Provide the complete VO6 modelling package including but not limited to inputs, outputs, schematics, hyetographs, hydrographs, and full pre and post development model files. The hydrologic modelling and associated reporting must be updated to reflect the Town's IDF criteria when determining on site flood control storage requirements.	The hydrologic model has been provided with the resubmission materials. If not received, please contact Isabelle ( <a href="mailto:iforsyth@cfcrozier.ca">iforsyth@cfcrozier.ca</a> ). Modeling was completed using the storm events included in the model (24 hour 10 minute Chicago storm distribution generated using Milton's IDF parameters) since the

				stormwater management controls are determined based on downstream impacts, which are within the Town of Milton. At the time of detailed design, Crozier will coordinate with the Town to determine the IDF parameters that should be used to size the SWM facilities.
9	SSWS & Stormwater Management Comments	CROZIER	The next submission must include full water balance information as part of the Scoped Subwatershed Study, with clear targets, assumptions, methodology, and supporting calculations. This will be the first opportunity for Town staff to complete a full technical review of water balance matters. The Servicing and Stormwater Management Report also proposes to meet the water balance target through infiltration of clean rooftop runoff using infiltration galleries or open bottom storage systems; however the conceptual plan identifies only one such facility. For the Zoning by-law Amendment application, identify conceptual locations for all proposed infiltration measures, demonstrate how they are distributed across the site, and confirm that the proposed approach is feasible considering the site grading, utilities, constraints, and phasing. The SSWS and the SWM Report must present a consistent water balance strategy. Further refinement can take place during the subsequent development applications.	Refer to the Hydrologic Modeling & SWM Report for the water balance assessment.
10	SSWS & Stormwater Management Comments	CROZIER	Further clarification and discussion are required regarding the heritage building known as Chisolm Home. Ownership of this property must be clearly documented and considered when evaluating drainage conveyance to a suitable outlet. If ownership changes, the lands will be treated as an external drainage area and must be appropriately accounted for in the study to ensure drainage reaches a sufficient and safe outlet.	The existing heritage home is proposed to be relocated within the Phase 2 lands. This is indicated in Section 1.3 of the Hydrologic Modeling & SWM Report. For more details on the heritage building, refer to the Heritage Impact Assessment by GBCA.
11	Area Servicing Plan	CROZIER	Section 1.1 – Site Background Study of the Area Site Servicing Plan identifies 3 one-storey industrial buildings and 7 commercial buildings. However, the submitted Conceptual Site Plan indicates a total of 11 buildings, consisting of 3 one-storey industrial warehouses and 8 retail buildings. Please ensure that all drawings and proposed reports are fully coordinated to reflect these details consistently.	ASP has been updated accordingly.
12	Area Servicing Plan	CROZIER	The Area Servicing Plan shown in Figures 2 and 3 outlines the ultimate sanitary and potable water servicing requirements for the area. The report notes that all sizing is preliminary and will be confirmed at the detailed design stage. However, Table 1 (Estimated Sanitary Demand), Table 2 (Estimated Domestic Demand), and the associated figures exclude Residential Area 4 from the calculations. Excluding these lands may affect the accuracy of future servicing capacity planning should a connection be required. The Area Servicing Plan is to account for these lands to ensure comprehensive long-term servicing planning.	Residential Area 4 has been included in the analysis in the ASP.
13	Transportation Impact Study	CROZIER (MIKE)	The ATP was not provided as part of this first submission; the ATP will have impacts to the review of the TIS through this application process. The Town's Transportation Team has further detailed comments, the comments in this section are written from a Development Engineering perspective.	TO DISCUSS FURTHER
14	Transportation Impact Study	CROZIER (MIKE)	The Traffic Impact Study (TIS) does not assess required road improvements for 5 Side Road beyond the recommended auxiliary turning lanes at the proposed full-movement access. Although the TIS acknowledges future transit considerations for Halton Hills and Milton, it does not identify any potential improvements needed on 5 Side Road to support these opportunities. This will be further reviewed in coordination with the forthcoming ATP.	TO DISCUSS FURTHER
15	Transportation Impact Study	CROZIER (MIKE)	Please confirm whether the reference to "Proposed Residential Development" in the Summary on Page vii of the TIS is a typographical error.	TO DISCUSS FURTHER
16	Transportation Impact Study	CROZIER (MIKE)	The TIS does not include a queueing analysis for the proposed gas bar west of Retail Building A. This comment is preliminary and may be updated following review of the forthcoming ATP.	TO DISCUSS FURTHER
17	Transportation Impact Study	CROZIER (MIKE)	Please note that Halton Region has an active project for Regional Road 25 (Steeles Avenue East to 5 Side Road), with design currently at approximately 90% completion.	TO DISCUSS FURTHER

18	Noise Impact Report	JADE ACOUSTICS	The submitted Noise Impact Study prepared by Jade Acoustics, dated November 12, 2025, is considered preliminary and will be subject to revision based on the final Site Plan design. Development Engineering staff note that a more detailed review will be undertaken at the Site Plan stage to assess potential impacts of the development on surrounding properties. One key concern in the preliminary report is the absence of proposed mitigation measures in the area adjacent to the trailer and truck parking at Building D and the nearby residential properties. Given the proximity of these homes, it is unclear why truck idling was not anticipated or evaluated for this location. Development Engineering staff expect that this matter will be examined in greater detail at the Site Plan stage once the development layout is further refined, and that appropriate mitigation measures will be implemented as part of the Development.	Acknowledged. A Detailed Environmental Noise Report will be prepared during the site Plan stage once the final grading plan, architectural plans and site plan become available. Appropriate mitigation measures (if required) to address the potential noise impacts of the employment use will be determined once the development layout of the employment area is available.
t19	Noise Impact Report	JADE ACOUSTICS	Section 2.0 Noise Sources of the Noise Study noted that Retail Block A is assumed to be a food store with vehicle repair operations. However, the submitted concept plan did not note down any repair operation/station for Retail Block A. All proposals and reports should be coordinated accordingly.	Retail Block A is assumed to be a food/grocery store only and has been updated in the forthcoming Updated Preliminary Environmental Noise Report. Please see the referenced report for details.
20	Noise Impact Report	JADE ACOUSTICS	The MECP guideline NPC-300 permits higher maximum sound levels for stationary sources compared to Table 3 of the Town's Noise By-law 2010-0030. The evaluation should apply the Town's lower Class 2 rural limits to ensure a more conservative assessment. In addition, because the future tenants and operating characteristics of the warehouse and commercial buildings are not yet confirmed, hours of operation remain uncertain. To maintain a conservative approach, noise should be evaluated across all time-of-day periods: 07:00–19:00, 19:00–23:00, and 23:00–07:00.	Please see updated Preliminary environmental noise report for details regarding the sound level limits. Warehouses within the employment area will be assessed in the Detailed Environmental Noise Report once the development layout of the employment area becomes available. Where nighttime operations associated with a specific building have not been assessed, such operations will not be permitted. See further details and clarifications regarding permitted hours of operation for the commercial buildings are provided in the updated Environmental Noise Report.
21	Phase One ESA	SOIL ENG	Provide a letter of reliance for the Town of Halton Hills and the Regional Municipality of Halton for the Phase One ESA prepared by Soil Engineers Ltd, dated November 7, 2025, Reference Number 2507-E174 and any future ESA supporting documentation and reports. A draft letter of reliance template is included with this comments package.	Noted.
22	Phase Two ESA	SOIL ENG	Provide a copy of the Phase Two ESA Report and include the same letter of reliance requirement for this document as noted for the Phase One ESA Report.	Noted.
23	RICE GROUP	EASEMENTS	An existing dwelling at 9092 Regional Road 25 currently shares a driveway with the subject site. Based on Document 19, Parts 1 of Plan 20R-8671 and Plan 20R-8812 are subject to Easement Instrument No. 703525, and the driveway serving 9092 Regional Road 25 appears to fall within these parts. Please demonstrate to the Town, through appropriate documentation, how these easements are being accounted for as part of this application and update the proposal accordingly.	Noted.
24	CONCEPT SITE PLAN	TFAI	Several of the proposed retail buildings exceed 300 square meters in gross floor area but do not show the required loading spaces, as required by the Town's Zoning By-law.	Noted.
25	CONCEPT SITE PLAN	TFAI	The daylight triangle associated with the northerly entrance onto Regional Road 25 must be realigned so that it is fully contained within the subject property and does not encroach onto adjacent lands. All daylight triangles must remain free and clear of obstructions, and tree plantings will not be supported within these areas.	Noted.
<b>TOWN OF HALTON HILLS – TRANSPORTATION</b>				

**Morteza Khashaypoor - Transportation Planning Technologist**  
**February 10, 2026**

**PART A: OPA & ZBA Application Comments**

#	Category	Assigned To	Comment	Response:
1	TIS	CROZIER (MIKE)	Per the Town's Transportation Impact Study (TIS) Guidelines, applicants are strongly encouraged to consult with Town staff prior to initiating any TIS-related work to ensure that the study scope and underlying assumptions are clearly established. The statement on Page 5 of the TIS report does not accurately reflect the process that occurred. Records show that the initial TIS Terms of Reference (ToR) were circulated to the Town on September 17, while TIS data collection had already been completed on September 9, which was before the study area and study intersections were confirmed. Because of this, the submitted TIS was prepared without an agreed-upon and approved ToR. This resulted in an insufficient study scope and incomplete supporting data. To ensure the study is properly structured, technically defensible, and aligned with Town expectations, the consultant must finalize the TIS Terms of Reference, including all study assumptions, and obtain Town approval before undertaking or continuing with any further analysis.	Noted. Town's TOR response was not circulated prior to first submission.
2	TIS	CROZIER (MIKE)	The proposed study intersections do not sufficiently capture the broader area-wide impacts of the development on the surrounding transportation network. Key intersections that are expected to be influenced by site-generated traffic have not been included. In particular, the intersection of 10 Side Road and Regional Road 25 serves as a primary route for Georgetown, Acton, and Town of Erin residents accessing the site and is anticipated to experience increased constraints as a result of the development. The exclusion of this and other critical intersections limits the ability to understand future network implications at this stage. Additional intersections, as noted below, should be included to support a more complete evaluation of transportation impacts: a. Regional Road 25/10 Side Road b. Regional Road 25/Peddie Road/Escarpment Way c. 5 Side Road/Boston Church Road/3rd Line d. 5 Side Road/Peddie Road/Mansewood Ct	TO DISCUSS FURTHER
3	TIS	CROZIER (MIKE)	The analysis horizon for a development of this scale and area of influence shall be established at 5 and 10 years beyond the build-out year. The 10-year horizon is required to ensure a comprehensive assessment of the long-term transportation impacts and is consistent with the Town's Guidelines for the Preparation of Transportation Impact Studies and Parking Justification Studies for Development Applications as well as the Halton Region TIS Guidelines.	TO DISCUSS FURTHER
4	TIS	CROZIER (MIKE)	All proposed road improvements, widenings, and associated assumptions, including the conceptual dimensions applied in the analysis for the existing and future roundabouts at Regional Road 25/5 Side Road and Regional Road 4/Campbellville Road & Regional Road 22, shall be confirmed by Halton Region prior to any updated to the report.	Beyond Town jurisdiction.
5	TIS	CROZIER (MIKE)	The Town has concerns regarding the site trip generation, trip distribution and assignment, and the assumptions and procedures applied to the future road network. These elements directly affect the assessment of the site's traffic impacts and overall site functionality from a transportation perspective. Detailed comments are provided in Part B.	TO DISCUSS FURTHER
6	TIS	CROZIER (MIKE)	The Town has concerns regarding the proposed parking provision for the Discount Warehouse Club. A site-specific parking requirement shall be established based on comparable Discount Warehouse Club developments with similar characteristics. The selection of comparable sites and the scope of the case study shall be circulated to and confirmed by the Town prior to commencing the parking review.	TO DISCUSS FURTHER
7	TIS	CROZIER (MIKE)	The parking concept for Block 2 proposes a shared parking design concept between the Discount Warehouse Club and Retail Units J and K. Given the typically high and competitive parking demand associated with Discount Warehouse Club uses, there is concern that the shared parking supply may not adequately support all uses over time. Further discussion and refinement of the parking strategy are required at this stage to ensure the proposed parking framework is appropriate and functional for the intended mix of uses.	TO DISCUSS FURTHER

8	TIS	CROZIER (MIKE)	The bicycle parking requirement in the conceptual site plan must be aligned with Table 57 of the TIS report. Bicycle parking spaces shall be clearly delineated on the site plan and distributed across each block according to the land use-specific bicycle parking requirements.	Noted.
9	TIS	CROZIER (MIKE)	Please revise Table 58 to reflect the minimum loading space requirements for Block 2 as per the Town Zoning By-law.	Noted.
10	Concept Site Plan/TIS	TFAI/CROZIER (MIKE)	The proposed regular parking spaces for the Discount Warehouse Club shall have dimensions that comply with the Town's Zoning By-law 2010-0050.	Noted.
11	TIS	CROZIER (MIKE)	The proposed development shall be transit-supportive and future-ready for transit service extension, particularly following build out of the Subject Site and the 401 Business Park area. To align with the Town of Halton Hills Official Plan, the development concept must clearly illustrate integration of transit-related facilities. This includes identifying preliminary bus service route extensions, designated locations for proposed bus stops, and dedicated walkways connecting these facilities to the internal pedestrian network.	TO DISCUSS FURTHER
12	TIS	CROZIER (MIKE)	The future roadway connection opportunities diagram does not adequately identify or illustrate potential future road connections required to support coordinated development, infrastructure planning, and network connectivity within the area.	TO DISCUSS FURTHER
13	TIS	CROZIER (MIKE)	The addition of a through lane on James Snow Parkway in the 2035 horizon, along with future queuing conditions at the Regional intersections such as intersection of Regional Road 25 and James Snow Parkway, remain a concern and shall be confirmed with Halton Region.	Beyond Town jurisdiction.
14	TIS	CROZIER (MIKE)	The Town has identified concerns regarding the performance and operational capacity of the future roundabout at Regional Road 25 and 5 Side Road under future total conditions. Detailed comments are provided in Section B. These concerns shall be discussed and confirmed by Halton Region.	Beyond Town jurisdiction.

**TOWN OF HALTON HILLS – ZONING**  
**Amanda Dickie, Zoning Officer**  
**February 04, 2026**

**General Comments**

#	Category	Assigned To	Comment	Response:
1	Draft Zoning By-law	PAUL BROWN	After discussions with Town Staff, it was recommended that the 401 Corridor Prestige Industrial M7-XX zone (with exceptions) shall be used as a replacement for the proposed EMP1 zone, and instead of introducing the new GC zone category, the 401 Corridor Gateway G-XX zone (with exceptions) shall be used.	Acknowledged. Per discussions with the Town, amendments to the draft zoning by-law will be coordinated directly with staff under separate cover.
2	Draft Zoning By-law	PAUL BROWN	The ET "Employment Transition" zone being proposed in the centre of the property is a newly established zone. Its purpose is to provide flexibility when designing the site for either Industrial or Commercial Purposes. A full review and analysis will be required once a proposal has been finalized and a zone has been determined. The proposal must comply with the requirements and restrictions of the zone chosen for the appropriate use (either the M7-XX zone or the G-XX zone) as well as all general provisions of the Zoning By-law, i.e. parking, loading, etc.	Acknowledged. No Action Items Required.

**Site A**

#	Category	Assigned To	Comment	Response:
1	Draft Zoning By-law Site-Specific Exception	PAUL BROWN RICE GROUP	Please review the permitted uses listed in Section 8.4.3.1 of the Zoning By-law. These uses will be permitted on the part of the property zoned G-XX. A " <b>Large Retail Warehouse</b> " is not listed as a permitted use. We recommend adding this use to accommodate the proposal and include a definition as well as a proposed parking requirement.  Please advise of any other permitted uses to include in the Draft By-law.	Acknowledged. Per discussions with the Town, amendments to the draft zoning by-law will be coordinated directly with staff under separate cover.
2	Draft Zoning By-law	PAUL BROWN	As per the Draft By-law submitted, Regional Road 25 shall be deemed the front lot line.	Acknowledged. No Action Items Required.

3	Draft Zoning By-law	PAUL BROWN	Section 8.4.4.8 indicates a minimum lot coverage requirement of 25% of the lot area. If the proposal cannot comply with this requirement, please consider adding a site-specific exception.	Acknowledged. Per discussions with the Town, amendments to the draft zoning by-law will be coordinated directly with staff under separate cover.
4	Draft Zoning By-law Site-Specific Exception	PAUL BROWN RICE GROUP	As per the Draft By-law submitted, the maximum building height proposed is 15 metres. Section 8.4.4.9 ii) indicates: "A stair tower, elevator shaft, water tank, silo, mechanical penthouse or other heating, cooling or ventilating equipment may exceed the maximum building height by a maximum of 5 metres, provided that the aggregate horizontal area of such elements (including the fence or other enclosure) does not exceed 30% of the roof area, and the width of such elements (including the fence or other enclosure) does not exceed 30% of the width of the wall facing a street." If the proposal cannot comply with this requirement, please consider adding a site-specific exception.	Acknowledged. Per discussions with the Town, amendments to the draft zoning by-law will be coordinated directly with staff under separate cover.
5	Draft Zoning By-law	PAUL BROWN	Section 8.4.4.10 states a Maximum Floor Space for a Retail Store is 2750 square metres. The large retail warehouse proposed would exceed the maximum permitted floor space. Please consider adding a site-specific exception.	Acknowledged. Per discussions with the Town, amendments to the draft zoning by-law will be coordinated directly with staff under separate cover.
6	Draft Zoning By-law	PAUL BROWN	Section 8.4.4.11 indicates a minimum landscaped open space requirement of 10% of the lot area. If the proposal cannot comply with this requirement, please consider adding a site-specific exception.	Acknowledged. Per discussions with the Town, amendments to the draft zoning by-law will be coordinated directly with staff under separate cover.
7	Draft Zoning By-law	PAUL BROWN	Section 8.4.4.12 indicates a minimum planting strip width requirement of 3.0 metres abutting any other street (that is not abutting Steeles Avenue or Highway 401 or 407). If the proposal cannot comply with this requirement, please consider adding a site-specific exception.	Acknowledged. Per discussions with the Town, amendments to the draft zoning by-law will be coordinated directly with staff under separate cover.
8	Draft Zoning By-law	PAUL BROWN	<p>Section 8.4.4.14 indicates the minimum size of a loading space shall be 3.5m x 12m with a 4.2m unobstructed height. The Minimum Loading Space requirements shall be calculated as per Section 8.4.12/Table B below. All 3 buildings appear to comply with the minimum requirements except for "Retail A". This building will require 5 loading spaces.</p> <p>All required loading spaces must be <b>within 15 metres of the building they are required for</b>. If the proposal cannot comply with this requirement, please consider adding a site-specific exception.</p> <ul style="list-style-type: none"> <li>Section 8.4.4.14 iii) indicates: <b>Loading spaces must be located adjacent to loading bays. Additional on-site designed commercial vehicle waiting space may be provided to the greater of two loading bays or 20% of the provided designated loading spaces for buildings with a gross floor area of less than 9,290 square metres. Buildings with a gross floor area of 9,290 square metres or greater are permitted additional on-site designed commercial vehicle waiting space to the greater of two loading bays or 100% of the provided designated loading spaces. All other commercial vehicle parking is not permitted as it would be considered as outdoor storage.</b></li> </ul> <p>If the proposal cannot comply with these requirements, please consider adding site-specific exceptions.</p>	Acknowledged. Per discussions with the Town, amendments to the draft zoning by-law will be coordinated directly with staff under separate cover.
9	CONCEPTUAL SITE PLAN	TFAI	The use for " <b>Retail I</b> " needs to be confirmed. It is indicated as retail but is showing a drive-through. <b>Please confirm all uses on the property so an accurate parking requirement can be determined.</b>	

			<ul style="list-style-type: none"> <li>If this building is intended to be a restaurant with a drive-through, it will be subject to Section 8.4.4.17 and the Queuing Requirements in Sections 8.4.18—8.4.26.</li> </ul>	Retail I has been renamed in the current site plan. Retail G and H are proposed as drive-through restaurants, and the queuing requirements have been met, as demonstrated in the current site plan.
10	CONCEPTUAL SITE PLAN	TFAI	Bicycle Parking Spaces are required as per Section 8.4.27/Table E below. Bicycle parking spaces are not shown on the proposed site plan. If the proposal cannot comply with this requirement, please consider adding a site-specific exception.	Bicycle Parking Spaces have been added to the current Site Plan.
<b>Site B</b>				
#	Category	Assigned To	Comment	Response:
1	Draft Zoning By-law	PAUL BROWN	Please review the permitted uses listed in Section 8.4.1.1 of the Zoning By-law. These uses will be permitted on the part of the property zoned M7-XX.	Acknowledged. No Action Items Required.
2	Draft Zoning By-law	PAUL BROWN	As per the Draft By-law submitted, Regional Road 25 shall be deemed the front lot line.	Acknowledged. No Action Items Required.
3	Draft Zoning By-law Site-Specific Exception	PAUL BROWN RICE GROUP	As per the Draft By-law submitted, the maximum building height proposed is <b>15 metres</b> . Section 8.4.2.8 ii) indicates:  <b><i>“A stair tower, elevator shaft, water tank, silo, mechanical penthouse or other heating, cooling or ventilating equipment may exceed the maximum building height by a maximum of 5 metres, provided that the aggregate horizontal area of such elements (including the fence or other enclosure) does not exceed 30% of the roof area, and the width of such elements (including the fence or other enclosure) does not exceed 30% of the width of the wall facing a street”</i></b>  If the proposal cannot comply with this requirement, please consider adding a site-specific exception	Acknowledged. Per discussions with the Town, amendments to the draft zoning by-law will be coordinated directly with staff under separate cover.
4	CONCEPTUAL SITE PLAN	TFAI	Section 8.4.2.9 indicates a minimum landscaped open space requirement of 20% of the lot area. If the proposal cannot comply with this requirement, please consider adding a site-specific exception.	Acknowledged. Per discussions with the Town, amendments to the draft zoning by-law will be coordinated directly with staff under separate cover.
5	CONCEPTUAL SITE PLAN	TFAI	Section 8.4.2.10 indicates a minimum planting strip width requirement of 3.0 metres abutting any other street (that is not abutting Steeles Avenue, Fifth Line, or Highway 401 or 407). If the proposal cannot comply with this requirement, please consider adding a site-specific exception.	Acknowledged. A minimum planting strip of 3.0 metres has been achieved across all sites.
6	Draft Zoning By-law	PAUL BROWN	Section 8.4.2.11 prohibits outdoor storage. Please confirm the purpose of the 20 trailer parking spaces. If these spaces are intended to be “commercial vehicle waiting spaces” as per Section 8.4.2.12 iii) below, please indicate that on the drawing. If they are used for storage of trailers, this is not permitted.  <b><i>“Loading spaces must be located adjacent to loading bays. Additional on-site designed commercial vehicle waiting space may be provided to the greater of two loading bays or 20% of the provided designated loading spaces for buildings with a gross floor area of less than 9,290 square metres. Buildings with a gross floor area of 9,290 square metres or greater are permitted additional on-site designed commercial vehicle waiting space to the greater of two loading bays or 100% of the provided designated loading spaces. All other commercial vehicle parking is not permitted as it would be considered as outdoor storage.”</i></b>	Acknowledged. Per discussions with the Town, amendments to the draft zoning by-law will be coordinated directly with staff under separate cover.
7	Draft Zoning By-law	PAUL BROWN	Please note: if any of the Industrial Units have accessory retail uses Section 8.4.2.14 shall apply:	Acknowledged. No Action Items Required.

	Site-Specific Exception	RICE GROUP	<ul style="list-style-type: none"> <li>• <b>A maximum of 10% of the gross floor area of the building devoted to the permitted manufacturing, warehousing or wholesaling use can be used for an accessory retail store.</b></li> <li>• <b>A maximum of 25% of the gross floor area of the building devoted to the permitted manufacturing, warehousing or wholesaling use, where the total floor area of the building is less than 1,000 square metres, can be used for an accessory retail store.</b></li> </ul>	
If the proposal cannot comply with this requirement, please consider adding a site-specific exception.				

**PARKING REQUIREMENTS**

#	Category	Assigned To	Comment	Response:
8	CONCEPTUAL SITE PLAN	TFAI	Please confirm all uses on <b>Site A</b> so minimum parking requirements can be determined. It appears <b>Site A</b> is entirely Retail Uses. Section 8.4.13/Table C indicates the minimum parking requirements for retail use is <b>1 parking space per 20 square metres of net floor area</b> . For Site A this would require <b>1018 parking spaces</b> .	Acknowledged. All uses in Site A are proposed to be retail uses, however specific uses (per building) are to be confirmed. A total of 1,083 parking spaces has been provided in the updated site plan.
9	CONCEPTUAL SITE PLAN	TFAI	It appears <b>"Retail I"</b> may be a restaurant. Please indicate the type of restaurant and see below for the required parking for restaurant uses:	Retail I has been renamed in the current site plan. Retail G and H are proposed as drive-through restaurants. Site B exceeds the minimum parking requirements.
10	CONCEPTUAL SITE PLAN	TFAI	<b>Site B</b> is an Industrial Mall as per the definition of the By-law (see below). The parking rate for an industrial mall is <b>1 parking space per 40 square metres of net floor area</b> . For Site B this would require <b>1320 parking spaces</b> . <ul style="list-style-type: none"> <li>• <b>"Industrial mall" means a building, or group of buildings, developed and managed as a unit in which each building contains two or more units or spaces for separate industrial use occupancy for which common parking and loading spaces and other common services are provided.</b></li> <li>• Please note: if any of the Industrial Units have accessory retail or office uses a minimum parking requirement of 1 parking space per 30 square metres of net floor area is required.</li> </ul>	Acknowledged. No Action Items Required.
11	CONCEPTUAL SITE PLAN	TFAI	Parking shall not be located in <b>any required yard abutting a residential</b> or institutional lot.	Acknowledged and addressed in the current site plan.
12	CONCEPTUAL SITE PLAN Draft Zoning By-law Site-Specific Exception	TFAI PAUL BROWN RICE GROUP	The minimum required parking spaces for this proposal would be <b>2338 parking spaces</b> (***)This was calculated using Industrial Mall and Retail parking rates only) <ul style="list-style-type: none"> <li>• The proposal does not comply with the minimum parking requirements of the Zoning By-law. A site-specific exception would be required.</li> </ul>	The site plan has been updated, and the calculations are demonstrated in the zoning chart, confirming compliance with the current scenario.

**TOWN OF HALTON HILLS – NATURAL HERITAGE**  
Sarah Labrie, Senior Environmental Planner  
January 21, 2026

**General Comments**

#	Category	Assigned To	Comment	Response:
1	GENERAL	RICE GROUP DILLON	Please include a comment response matrix and a track changes version of any reports that are updated.	Noted
2	GENERAL	RICE GROUP DILLON	The submission is considered incomplete from a technical perspective since there are sections and/or reports missing that are needed to conduct a complete review. The scoped SWS report defers several items to the next submission. These will be	The NHE has been updated to support Phase 1 of the proposed development. Future studies

			required to properly assess the overall environmental impacts of the proposal. Please see the following preliminary comments, which are subject to additional commentary upon submission of completed reports and plans.	(i.e., SSWS and/or Secondary Plan) will be completed for Phase 2 of the development.
<b>Natural Heritage System (NHS) Characterization and Delineation</b>				
#	Category	Assigned To	Comment	Response:
1	Significant Valleyland and Watercourses	DILLON	a. A watercourse sensitivity analysis is required that classifies the watercourses in the study area according to ecological and physical characteristics.	This will be completed as part of future studies for Phase 2 (i.e., SSWS and/or Secondary Plan).
		DILLON	b. All surface water features will be assessed to determine their status as headwater drainage features, watercourses, seeps and/or springs, and vernal pools.	Surface water features have been identified within the Study Area ( <b>Figure 3</b> ) and discussed in the NHE to the extent possible based on the work completed thus far. Features within Phase 2 will be discussed in future studies (i.e., SSWS and/or Secondary Plan).
		DILLON	c. All surface water features will be assessed to determine the most appropriate management strategy based on the integration of ecology, hydrology, and natural hazard information.	Surface water features have been identified within the Study Area ( <b>Figure 3</b> ) and discussed in the NHE to the extent possible based on the work completed thus far. Features within Phase 2 will be discussed in future studies (i.e., SSWS and/or Secondary Plan).  A Wetland Study memo ( <b>Appendix E</b> ) has been prepared to support the proposed wetland removals.
2	Significant Wildlife Habitat	DILLON	a. SWH field assessments should be stationed at all areas providing suitable habitat. Given the presence of suitable wetland breeding habitat characteristics and observations of adult anurans during the appropriate breeding window, the feature should not be overlooked as suitable breeding or overwintering habitat. The feature should be included in the site characterization scope of work and its function as shallow marsh habitat should be replicated on site as a component of any wetland offsetting plans. <ul style="list-style-type: none"> <li>It is not the intention of Town staff to apply restrictions over this feature but rather to ensure that any habitat functions are appropriately documented and replicated, and that any salvage mitigation for the decommission is conducted.</li> </ul>	Proposed amphibian breeding and breeding bird survey points have been shown on <b>Figure 3</b> and will capture the man-made pond.
		DILLON	b. The confirmed presence of a Significant Wildlife Habitat type should be reflected in the discussions related to the riparian wetlands and watercourse, which is being referenced as degraded. The report must provide an appropriate terrestrial context for the overall quality of the watercourse reach and the habitat function it provides.	Features within Phase 2 will be discussed in future studies (i.e., SSWS and/or Secondary Plan).
3	Wetlands	DILLON	c. Clarify what manual or policy documents were used to determine wetland presence and status in the study area. Given the planning context driving the ecological work, confirm that the Official Plan and PPS have been reviewed for the definition of 'wetland' and 'significant' that are to be used when identifying municipal NHS.	Section 5.5.2 of the NHE has been updated. Features within Phase 2 will be further discussed in future studies (i.e., SSWS and/or Secondary Plan).
		DILLON	d. The wetland evaluation file should be submitted for wetland assessments targeting the determination of provincial significance status (i.e., OWES).	Section 5.5.2 of the NHE has been updated. Features within Phase 2 will be further discussed in future studies (i.e., SSWS and/or Secondary Plan).
		DILLON	e. Note that the Official Plan includes both PSW and 'other' wetlands as components of the NHS.	Section 5.5.2 of the NHE has been updated. Features within Phase 2 will be further

				discussed in future studies (i.e., SSWS and/or Secondary Plan).
		DILLON	f. To ensure that Official Plan policy goals and objectives are achieved, please include Town environmental planning staff along with Conservation Halton in wetland discussions, regardless of their provincial significance.	Acknowledged.
4	Fish Habitat and Species at Risk Habitat	DILLON	a. To ensure provincial planning policy related to development and site alteration within or adjacent to Fish Habitat and Habitat for Endangered and Threatened species is met, please provide the Town with documentation from the consultations between the applicant and Federal and/or Provincial agencies. To facilitate a timely review, the Town's environmental planning staff should be included in discussions that may influence or impact on the contiguous NHS (e.g. channel realignment, buffers).	Consultation with DFO will be provided as part of Phase 2.
5	Buffers	DILLON	a. As indicated through comments on the Terms of Reference (ToR), a buffer refinement analysis is required to demonstrate that the proposed reductions from 30m will not result in a negative impact on the ecological or hydrologic function of the NHS. Technical justification and a satisfactory rationale supporting the reduction in width are required, including demonstrating how reductions in width are planned to be offset through techniques such as enhancement plantings and buffer averaging. The buffer areas should be enhanced through mitigation techniques as necessary to ensure they are high-functioning. Sufficient information is not included in the submission and the buffer recommendations are considered premature at this stage.	Section 9.2 of the NHE has been updated to provide a summary table with preliminary buffers and setbacks. They will be refined and/or confirmed through future studies (i.e., SSWS and/or Secondary Plan) for Phase 2.
		DILLON	b. All buffer areas will be placed into restrictive environmental protection zoning (EP1) and will not be available to accommodate the ultimate site plan, grading (temporary or final), or infrastructure that is not essential. Where infrastructure is proposed within the buffer, the buffer will be widened to accommodate the use.	This will be discussed through future studies (i.e., SSWS and/or Secondary Plan) for Phase 2.
		DILLON	c. Feature-specific notes: i. Significant Woodlands - Revise the comment suggesting there is provincial direction by way of the Natural Heritage Reference Manual for a 10m buffer to significant woodlands. There does not appear to be any such quantification offered in section c.1.2. In Town staff professional experience, a 10m setback to a treed dripline is necessary to account for hazard tree fall and ensure access is available to public safety concerns. Industry standards do not necessarily represent best practices for greenfield development. Ecological buffers will need to account for mitigating ecological impacts associated with land use intensification. ii. Significant Valleylands – The presence of a significant woodland associated with the valley indicates that natural heritage should be factored into buffer determination for this feature. As directed in the NHRM, hazard setbacks are considered the minimum when no other NHS components are identified within the valleyland. The scoped SWS must ensure that buffer recommendations for this feature have adequately addressed ecological and natural hazard functions.	Section 9.2 of the NHE has been updated to provide a summary table with preliminary buffers and setbacks. They will be refined and/or confirmed through future studies (i.e., SSWS and/or Secondary Plan) for Phase 2.  Note the valleyland setbacks conformed with the Town's OP Policy C4.3.
1	Impact Assessment	DILLON	The impact assessment must demonstrate that the proposal will not have a negative impact on the ecological function of NHS or any components thereof. This will involve a fulsome characterization of the ecology and hydrology of the features to inform sensitivity and significance analysis.	A Wetland Study memo ( <b>Appendix E</b> ) has been prepared to support the proposed wetland removals in Phase 1.  Impacts to features within Phase 2 will be discussed through future studies (i.e., SSWS and/or Secondary Plan).
2		DILLON	There does not appear to be a need or supportive rationale for a channel realignment to accompany the proposed floodplain modifications (cut/fill). This reach contains three separate natural heritage system components, including Key Feature (significant wildlife habitat and fish habitat), a wetland, and a watercourse. The applicable policy goals support management recommendations for protection and enhancement. If floodplain modifications are permitted, the works must demonstrate the use of avoidance first principles for the protection and enhancement of the NHS. Floodplain modification works should not result in a negative impact to form or function of the NHS. The feasibility and merits of natural channel design and wetland	Channel re-alignment is not proposed as part of Phase 1.

			<p>replication will not be reviewed in isolation from policy goals for the protection of Key Features, which include the application of a buffer.</p> <ul style="list-style-type: none"> <li>Provincial mitigation support for terrestrial crayfish habitat indicates that grading and filling will destroy the habitat, indicating that the realignment would result in a negative impact.</li> </ul>	
3		DILLON	<p>The information available uses isolation as a key metric when recommending NHS modification through relocation (i.e., on-site offsetting). This qualifier does not apply to riparian wetlands or significant wildlife habitat associated with the watercourse, as they are all inherently part of the system under existing conditions. The information and management recommendations in the scoped SWS should support compatible land uses and future development scenarios that appropriately address site context and account for existing environmental conditions and ecological constraints.</p>	<p>Channel re-alignment is not proposed as part of Phase 1.</p>
4		DILLON	<p>The proposal to offset certain natural heritage features (i.e., isolated, non-significant) must be accompanied by technical work (characterization and replication feasibility analysis). It is expected that the applicant, the Town, and Conservation Halton will work closely to ensure that the preferred solutions are supportable before issuing conditions of approval.</p>	<p>A Wetland Study memo (<b>Appendix E</b>) has been prepared to support the proposed wetland removals in Phase 1.</p> <p>The final offsetting location will be confirmed through future studies (i.e., SSWS and/or Secondary Plan) for Phase 2.</p>
5		DILLON	<p>Modification of the NHS through relocation of the isolated wetland features may be considered pending an evaluation of existing sensitivity and significance, analysis of impacts, and an assessment of replication feasibility. Species dispersal probability and lag time to a free-to-grow state should be considered when assessing feature offsetting as a management recommendation.</p> <ul style="list-style-type: none"> <li>Proposals for wetland offsetting will need to be discussed with Conservation Halton and Town staff. The Town does not have an explicit policy framework or technical guidelines for natural heritage offsetting. The use of the CVC Ecosystem Offsetting Guideline ratios and principles has been required in the past when wetland offsetting has been contemplated. The project consultant will ensure that recommendations for offsetting as a management strategy are consistent with these guidelines. Please see additional comments below.</li> </ul>	<p>A Wetland Study memo (<b>Appendix E</b>) has been prepared to support the proposed wetland removals in Phase 1.</p> <p>The final offsetting location and compensation plan will be confirmed and provided through future studies (i.e., SSWS and/or Secondary Plan) for Phase 2.</p>
6		DILLON	<p>It must be demonstrated with a reasonable degree of certainty that a given feature can be relocated on site while meeting the applicable policy goals and regulatory requirements. The features deemed appropriate and suitable for replication will not be those considered significant or where data gaps exist. The proposed offset location must be demonstrated as hydrologically and ecologically suitable and accessible without causing additional impacts.</p>	<p>A Wetland Study memo (<b>Appendix E</b>) has been prepared to support the proposed wetland removals in Phase 1.</p> <p>The final offsetting location and compensation plan will be confirmed and provided through future studies (i.e., SSWS and/or Secondary Plan) for Phase 2.</p>
7		DILLON	<p>Replicated features are not to be designed as infrastructure or as direct recreational areas.</p>	<p>Noted.</p>
1	Offsetting Areas	DILLON	<p>The guiding offsetting principle of land-based conservation is supported by Town staff, meaning the area removed is added back to the system. The scoped SWS will need to demonstrate a 1:1 land-based offset (please see the CVC guideline for vegetation offset ratios) that adds area to the existing limits of the NHS (i.e., not internal to the system).</p>	<p>A Wetland Study memo (<b>Appendix E</b>) has been prepared to support the proposed wetland removals in Phase 1.</p> <p>The final offsetting location and compensation plan will be confirmed and provided through future studies (i.e., SSWS and/or Secondary Plan) for Phase 2.</p>

2		DILLON	Demonstrate that proposed offsetting areas are in addition to areas identified as components of the overall NHS (i.e., in addition to buffers, linkages, and enhancement areas).	<p>A Wetland Study memo (<b>Appendix E</b>) has been prepared to support the proposed wetland removals in Phase 1.</p> <p>The final offsetting location and compensation plan will be confirmed and provided through future studies (i.e., SSWS and/or Secondary Plan) for Phase 2.</p>
3		DILLON	The offsetting area shown on Figure 6 of the scoped SWS appears to be spatially constrained by the application of buffers to the existing NHS and requires crossing of the system to permit construction, monitoring, and ultimate management of the area. Given the spatial and access constraints, the proposed location does not appear suitable for active wetland construction and restoration. The scoped SWS will need to investigate alternative offsetting areas if offsetting is permitted.	<p>A Wetland Study memo (<b>Appendix E</b>) has been prepared to support the proposed wetland removals in Phase 1.</p> <p>The final offsetting location and compensation plan will be confirmed and provided through future studies (i.e., SSWS and/or Secondary Plan) for Phase 2.</p>

**TOWN OF MILTON**  
**Christian Lupis, MCIP, RPP Director, Development Review**  
**February 19, 2026**

**Town Planning**

#	Category	Assigned To	Comment	Response:
1	GENERAL	PAUL BROWN	The proposed development at No. 5 Side Road and Regional Road 25 are near the Town's 401 Industrial/Business Park Secondary Plan Area and several residential properties located on the south side of No. 5 Side Road.	Acknowledged. No Action Items Required.
2	GENERAL	PAUL BROWN	Planning staff note that Section 3.5 of the PPS provides policy direction to ensure that land use compatibility is dealt with during planning processes and that every effort will be made to minimize and mitigate adverse effects.	Acknowledged. No Action Items Required.
3	GENERAL	PAUL BROWN	Planning staff note that the residential properties near the proposed development should be consulted as part of an open and transparent planning approvals process.	Acknowledged. No Action Items Required.
4	GENERAL	PAUL BROWN	Section 2.6.3.5 of the Town of Milton's Official Plan states that the Town will work co-operatively with the Province and the Region of Halton and adjacent municipalities to integrate the planning of the municipal road network with the roads under the provincial and Regional jurisdiction and in the planning of roads which cross municipal boundaries.	Acknowledged. No Action Items Required.
5	GENERAL	PAUL BROWN	The subject property is adjacent to the Town of Milton's 401 Industrial Business Park and the Town of Milton's Official Plan (February 2026 consolidation) identifies the 401 Industrial Business Park Area as being an 'Employment Area'. Policy direction provided in the Town of Milton's Official Plan focuses on allowing employment uses such as various scales of manufacturing, warehouse activities and industrial uses, including ancillary retail and office uses directly related to the industrial facilities.	Acknowledged. No Action Items Required.
6	ROAD R.O.W.S	PAUL BROWN CROZIER (MIKE)	Section C.2.2.2.1e) iii) and Section C.2.2.2.1 h) of the Town of Milton's Official Plan provides policy direction on roads and intersections that have a significant role in the community, and No. 5 Side Road and Regional Road 25 is considered a gateway into the 401 Business Park Area. The Town requires special design treatment of the road right-of-way and any development adjacent to the right-of-way.	Acknowledged. To be considered at a subsequent design stage.
7	GENERAL	DILLON	The Town's 401 Industrial Business Park Secondary Plan does indicate that the Town intends to create a linked open space system connected with other areas of the Town which protects for key existing natural features. These natural features and areas extend beyond the Milton boundary into Halton Hills on the subject property and Staff requests that these features and areas are protected.	Acknowledged. No Action Items Required.

8	GENERAL	URBANMETRICS	At this time, Town of Milton staff have confirmed that the Retail Market Impact Analysis prepared by Urban Metrics and dated December 8, 2025, will be peer reviewed as part of the Town of Halton Hills review process. Town of Milton staff have requested a copy of these peer review comments as part of our review and response.	Acknowledged. No Action Items Required.
<b>Development Engineering</b>				
#	Category	Assigned To	Comment	Response:
1	GENERAL/HOUSEKEEPING	CROZIER	The following housekeeping items are applicable to each of the reports and/or studies: a. There are inconsistencies noted between each of the reports and/or studies. Please review the reports and/or studies and revise them, if necessary, to ensure consistency across each of the reports and/or studies. b. The section of the West Tributary of Sixteen Mile Creek on the south side of No. 5 Side Road is named Reach N-2-B in previous reports and/or studies whereas in the Scoped Subwatershed Study (Scoped SWS) has named this section of the West Tributary of Sixteen Mile Creek as Reach N-2-C. Please revise the reports and/or studies accordingly. c. There are two reports with similar names, 'Servicing & Stormwater Management Report' prepared by CFCA dated October 31st, 2025, and 'Hydrologic Modeling & Stormwater Management Report' prepared by CFCA dated October 31st, 2025, in Appendix C of the Scoped SWS. Please consider renaming one or both reports to help alleviate confusion when referring to the reports.	a. Noted. b. The reach breaks and identifiers were refined from previous studies based on site-specific field work completed. c. The Servicing & Stormwater Management Report is now just a Servicing Report. All stormwater management is presented in the Hydrologic Modeling & Stormwater Management Report.
2	Scoped SWS ToR	CROZIER	Please confirm if another submission of the Scoped Subwatershed Study Terms of Reference (Scoped SWS ToR) is expected. The Scoped SWS ToR Comment Response Matrix prepared by C.F. Crozier & Associates Inc. (CFCA) dated December 8th, 2025, adequately addresses the Town of Milton's comments regarding the Scoped SWS ToR prepared by CFCA dated September 23, 2025, however it is unclear if another submission of the Scoped SWS ToR which incorporates the changes identified in the response matrix.	Per the meeting on March 24 with CH and the Town of Halton Hills, an SSWS is not required at this time, therefore an updated version of the Scoped SWS ToR will not be provided.
Scoped Subwatershed Study (Scoped SWS) prepared by C.F. Crozier & Associates Inc. (CFCA) dated October 31, 2025.				
3	Section 1.4 Study Objectives (Page 4)	CROZIER	a. Section 1.4 Study Objectives (Page 4) Please include the following objectives in this section. i. Demonstrate there are no adverse effects to the Town of Milton's Natural Heritage and Stormwater Management Infrastructure, including but not limited to, the watercourse (N-2-B), culverts and the Highpoint Stormwater Management facility and associated stormwater infrastructure. ii. Demonstrate there are no adverse effects on flooding of downstream properties.	Not applicable (the SSWS is not being resubmitted at this time).
	Section 1.5 Terms of Reference (Page 4)	CROZIER	b. Section 1.5 Terms of Reference (Page 4) i. CFCA is to confirm that the Terms of Reference provided in Appendix A are approved. The submission of the Scoped SWS ToR Comment Response Matrix prepared by CFCA is dated December 8, 2025, suggests that another submission of the Scoped SWS ToR is anticipated. ii. Upon approval of the Scoped SWS ToR (if the Scoped SWS ToR dated September 23, 2025, is not approved), the body of the Study and Appendix will need to be updated.	The Terms of Reference have not been approved, and is no longer required.
	Section 3.0 Existing Conditions (Page 7)	CROZIER	c. Section 3.0 Existing Conditions (Page 7) i. The Study Area is to be expanded to include 120 metres of land external to the Subject Development as shown in Figure 1.	Not applicable (the SSWS is not being resubmitted at this time).
	Section 3.3 Flood Hazard (Page 22)	CROZIER	d. Section 3.3 Flood Hazard (Page 22) i. Please circulate the updated modelling and flood lines to the Town of Milton in the next submission.	The updated modeling and flood lines have been included with the submission of the Hydraulic Analysis Report. If the modeling is not received, please contact Isabelle ( <a href="mailto:iforsyth@cfcrozier.ca">iforsyth@cfcrozier.ca</a> ).

	Section 3.3.4 5 Side Road Culvert Assessment (Page 22)	CROZIER	e. Section 3.3.4 5 Side Road Culvert Assessment (Page 22) i. As noted, the Hydraulic Assessment (updated) will include an assessment of the culvert crossing No. 5 Side Road, please ensure that the Town of Milton is circulated the updated Hydraulic Assessment. ii. There is an updated version of the MTO Highway Drainage Design Standards dated November 2023. Please update the reference.	i. Refer to the provided Hydraulic Analysis Report. ii. The reference has been updated in the Hydraulic Analysis Report.
	Section 3.4 Fluvial Geomorphology (Page 25)	CROZIER GEO MORPHIX	f. Section 3.4 Fluvial Geomorphology (Page 25) i. The 'Reach N-2-C' is to be revised to 'N-2-B' to ensure consistency with previous studies. ii. Please confirm that the reach name, N-2-C, in Table 7 (Page 26) is appropriate as previous studies indicate a reach name of 'N-2-B.'	i. Reach breaks and identifiers were refined from previous studies based on tributary confluences, changes in land use/cover, and channel characteristics observed during site specific field work. This text has been added to Section 3.1 of the Fluvial Geomorphology Report (GEO Morphix Ltd, 2026). ii. Reach N-2-C was delineated south of 5 Side Road by GEO Morphix. See response to above comment.
Servicing & Stormwater Management Report prepared by CFCA dated October 31, 2025.				
4	Section 1.1 Site Description (Page 1)	CROZIER	a. Section 1.1 Site Description (Page 1) i. The existing use of the Subject Property is not consistent with Section 1.2 Study Area (Page 1) of the Scoped SWS.	Noted. The existing use in the FSR has been updated to match the SWM Report.
	Section 1.3 Reference Documents (Page 1)	CROZIER	b. Section 1.3 Reference Documents (Page 1) i. There are references that will require updating.	Noted.
	Section 4.4 Stormwater Quality Control (Page 6)	CROZIER	c. Section 4.4 Stormwater Quality Control (Page 6) i. Per the red-lined report, to ensure clarity, this section requires re-organization.	Noted. Stormwater Management has been removed and the report only refers to servicing now.
	Section 5.2 Sediment Control Measures (Page 7)	CROZIER	d. Section 5.2 Sediment Control Measures (Page 7) i. The location of the construction access is preferred to be on Regional Road 25 as No. 5 Side Road is not a truck route. ii. Where will the temporary sediment basin outlet go to? If the outlet is proposed to outlet to Sixteen Mile Creek, will it have any impact downstream?	Noted. The temporary sediment basin will be detailed at SPA.
Preliminary Environmental Noise Report prepared by Jade Acoustics Inc. dated November 12, 2025.				
5	Noise Report	JADE ACOUSTICS	a. Please confirm that the sound levels due to increased traffic on No. 5 Side Road to/from Subject Development were considered to determine the appropriate noise mitigation measures so as not to cause adverse noise impacts to those Residents on No. 5 Side Road.	Please see Updated Preliminary Environmental Noise Report for details.
	Noise Report	JADE ACOUSTICS	b. The Appendix should include the traffic data for No. 5 Side Road.	See Above.
	SCOPE OF WORK INCLUSION	CROZIER DILLON	Please be advised that the Town of Milton will require a copy of the next submission of the detailed reports and/or studies, and drawings for review to ensure there are no adverse effects to the Town of Milton's natural heritage and stormwater infrastructure, including by not limited to, watercourse N-2-B, culverts, and Highpoint stormwater management facility and associated infrastructure.	Noted.
<b>Transportation</b>				
<b>#</b>	<b>Category</b>	<b>Assigned To</b>	<b>Comment</b>	<b>Response:</b>

1	TIS	CROZIER (MIKE)	Based upon the technical review of the application submission, Transportation Planning have reviewed the Traffic Impact Study as prepared by C.F. Crozier & Associates Inc. and dated November 14, 2025, and offer the following comments: <ul style="list-style-type: none"> <li>Please ensure that the intersection of 5 Side Road @ 5 Side Road is captured as part of the analysis; and</li> <li>Town staff may have additional comments as part of the second submission.</li> </ul>	
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Fire				
#	Category	Assigned To	Comment	Response:
1	GENERAL	RICE GROUP	Town of Milton and Halton Hills currently have an Automatic Aid Agreement to respond to this address. Under this agreement, the Town of Milton is responsible for the first hour of operations and then the call would be transferred to Halton Hills Fire.	Noted.
2	GENERAL	RICE GROUP	Halton Hills Fire Prevention is responsible for plan approvals or fire inspections regarding buildings within Halton Hills.	Noted.

**HALTON REGION**  
**Adam Huycke, MCIP, RPP**  
**February 10, 2026**

**Area Servicing Plan TOR Comments**

#	Category	Assigned To	Comment	Response:
	ASP TOR Comments	CROZIER	<p><b>Overarching Comments</b></p> <ul style="list-style-type: none"> <li>Bases upon the overall intent and purpose of the servicing assessment, it is recommend that the report be renamed from "Area Servicing Plan" to "Comprehensive Servicing Study".</li> <li>TofR should identify and highlight all relevant documents, data sources and information to be used as part of the report.</li> <li>The TofR should highlight the phasing of assessment (incremental approach to analysing servicing)</li> <li>The report should in a Timing and Phasing section to highlight planning horizon for the proposed development.</li> <li>TofR should provide discussion on DC infrastructure that may be required to support the proposed use. This may be dovetailed with the financial analysis piece.</li> <li>TofR should highlight and discuss extent of downstream analysis required to evaluate the proposal which may include capacity analysis to the plant(s). NOTE: additional details in this regard provided below.</li> <li>TofR should provide for how the report will be organized.</li> </ul>	<p>This was not discussed on the call we had on March 6, report title remains as Area Servicing Plan, which encompasses the intent of the report.</p> <p>This information will be presented in detail in the ASP.</p> <p>There are two phases presented in the ASP. Phase 1 = only Rice's land. Phase 2 = the entire Study Area. Additional phasing or timing discussion is not feasible at this time as information from the other developer's is not available.</p> <p>The ASP includes discussion on DC infrastructure as listed in the IMP.</p> <p>This has been added to the TOR.</p> <p>A table of contents has been included in the TOR.</p>

**Commented [JS1]:** Year of Rice Group? State we are unsure about timing of other areas. Perhaps Rice talks to other landowners? Include scenario with only Rice, then rest of study area lands

Likely interested developers will be in the next 10 years - Rice in the next year ish

		<ul style="list-style-type: none"> <li>The language of the ToFR does not accurately represent the intent of the study. For instance, under Section 1.2: Study Area Definition, “the Study area will be the focus of the ASP, which represents the site and the surrounding areas which could connect to municipal water and wastewater infrastructure”. This statement suggests that the area is to be serviced verses a study that is completed and informed by a lands needs assessment.</li> <li>Figure 1 of the ToFR builds on the direction of Section 1.2 and only shows the additional lands to be serviced. When reviewed against the content of this ToFR, this misleads the scope and intent of the analysis to only focus on how these lands can be serviced, and what improvements may be required to service these lands. It is recommended that the scope of study identify the subject lands (including the adjacent lands subject to a separate pre-con). Further, and assuming that the lands needs assessment supports additional employment lands, the scope of work should evaluate servicing the subject the subject lands verses servicing other areas within the Town of Halton Hills and Town of Milton (due to the proximity of these lands to the Town of Milton). Note: coordination with the Town of Milton is recommended.</li> <li>Section 1.3: The study purpose should clearly identify that the evaluation of capacity will within both the water and wastewater system will look need to consider vacant and/or under-utilized lands from a capacity perspective (i.e. existing urban vacant or under-utilized lands within the downstream system should have capacity protected to accommodate development proposals).</li> <li>Section 1.3 should also clearly identify that any recommendations for servicing improvements needs to be evaluated against servicing or upgrades to other potential growth areas and/or new urban lands. This section as currently worded only implies that the evaluation of upgrades for these lands will be undertaken. Further, it is recommended that a holistic evaluation to servicing the entire area NW of Regional Road 25 and No. 5 Side Road should be undertaken.</li> <li>Section 1.4 – Report Contents: The language of this section implies that the servicing and capacity analysis (including and improvements) is to occur solely based upon the development requirements for the subject lands. This section needs to indicate that a fulsome analysis of capacity for existing planned urban uses needs to occur (should there be capacity), acknowledging those existing urban uses have priority (albeit regional servicing is on a first come first serve basis). The study should acknowledge existing planned urban uses have priority over capacity then new urban areas do. Additionally, the analysis should include detailed discussion over servicing these lands verses servicing other areas.</li> </ul>	<p>Per the meeting on March 6 with the Region and Town, we are not required to consider a lands needs assessment.</p> <p>Per the meeting on March 6 with the Region and Town, we are not required to consider a lands needs assessment.</p> <p>Per the meeting on March 6, 2026 with the Region and Town, Crozier is not required to considering vacant / under-utilized lands in the CSS. The Region confirmed they will complete this modeling inhouse.</p> <p>Per the meeting on March 6, 2026 with the Region and Town, Crozier is not required to consider potential growth areas / new urban lands in the ASP. The Region confirmed they will complete this modeling inhouse. The Study Area limit has been increased, see Figure 1 in the TOR.</p> <p>Per the meeting on March 6, 2026 with the Region and Town, it was acknowledged the Region will handle this inhouse as Crozier is not privy to this information.</p> <p>Discussion on the IMP is included in the ASP.</p>
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**Commented [JS2]:** Downstream capacity analysis to wastewater treatment plant (midhalton).

**Commented [JS3]:** Region will take back for modeling

**Commented [JS4]:** Region will take back for modeling

		<ul style="list-style-type: none"> <li>Section 1.4: This section should clearly indicate how servicing analysis, including modeling, is to be provided. This analysis needs to include a detailed review of the Region’s master plan and impacts of the proposal on delivering the master plan also needs to occur.</li> <li>The ToFR suggests that as part of the submission technical studies are to be provided (See Section 2.0). I think it would be more appropriate to phase the submission and have the comprehensive portion of the development completed before technical studies are completed. This would mean an incremental approach to evaluating the servicing component of this development driven OPA.</li> <li>Section 4.0: This section should be updated to clearly indicate a comprehensive servicing analysis, and the incremental approach to servicing analysis as suggested above.</li> </ul> <p><b>Comprehensive Servicing Report Comments:</b> The report must present and should include:</p> <ul style="list-style-type: none"> <li>Population, water consumption and wastewater generation for the proposed development</li> <li>Updated water and wastewater hydraulic models to reflect the proposed population and infrastructure requirements. The updated models shall utilize InfoWorks ICM for wastewater analysis and InfoWater Pro for water analysis.</li> <li>The preferred water and wastewater servicing strategy, based on updated hydraulic models and incorporating the proposed population.</li> <li>A clear and detailed roadmap for required infrastructure and any necessary upgrades to support the proposed development.</li> <li>The modeling shall ensure that the as-of-right wastewater capacity of existing or for proposed properties within the existing urban boundary shall not be impacted by this urban boundary expansion. In this regard and as discussed herein, the downstream capacity of all sewers, <b>pumping stations, and treatment facilities</b> will be considered in the modeling.</li> <li>Gravity drainage will be considered to ensure that flows are being directed to the existing pumping stations or the treatment facility via a gravity sewer.</li> </ul>	<p>Per discussion in the meeting on March 6, 2026 with the Region and Town, this approach does not align with the developer’s timeline.</p> <p>See responses above.</p> <p>This information is in the ASP.</p> <p>The ASP utilizes the latest models received from the Region.</p> <p>The ASP does not analyze multiple strategies, one solution for water and one solution for sanitary are presented in the report.</p> <p>This information is provided in the ASP at a functional level.</p> <p>The modeling confirms existing properties are not impacted but does not consider proposed properties. Which aligns with the discussion in the meeting on March 6, 2026 with the Region and Town.</p> <p>Confirmed.</p> <p>This information is in the ASP.</p>
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**Commented [JS5]:** Capacity of pumps to be checked under wet weather

		<ul style="list-style-type: none"> <li>• High level grading and sewer obverts shall be considered to ensure that adequate depth of bury of the sewers can be achieved.</li> <li>• A high-level comment within the Comprehensive Servicing Study should state that all drainage from the subject property will be drained away from the Regional Road 25 ROW.</li> </ul> <p>In providing the above, the following technical comments and information is provided to assist the proponent in updating the TofR and scope of study/analysis required as part of this report:</p> <p>Population (Residential and Non-Residential) Population for the study area is to be derived from either of the following sources, based on the most accurate and appropriate information available:</p> <ol style="list-style-type: none"> <li>1. Unit count and housing type for residential*</li> </ol> <p>Building floor area for non-residential* *Persons per Unit or m<sup>2</sup> per Employee are as per the latest published <a href="#">Halton Region Development Charges Background Study</a>.</p> <ol style="list-style-type: none"> <li>2. Equivalent Population Density Table 2-1 in <a href="#">Halton Region's Water Wastewater Linear Design Manual (Version 6)</a>.</li> </ol> <p>Water Consumption and Wastewater Generation</p> <ul style="list-style-type: none"> <li>• Peaking factors for maximum day and peak hour water consumption need to be calculated and applied. These factors will be incorporated into the water distribution system hydraulic model.</li> <li>• Peaking factors for peak dry weather wastewater generation need to be calculated, and infiltration and inflow catchment parameters will need to be determined for wet weather flows. These will be incorporated into the wastewater collection system hydraulic model.</li> <li>• Water and wastewater design criteria to be utilized are outlined below.</li> </ul> <p><b>Water</b></p>	<p>This comment is related to stormwater and will be included in the SWM report, not the ASP.</p> <p>Noted. Refer to ASP.</p> <p>Noted. Refer to APS. Demand calculations have been updated per comments received.</p>
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Average Day Water Design Criteria		
Parameter	Current – 2022 DC Background Study	Proposed Design Criteria
Residential	265 L/capita/day	230 L/capita/day
Blended ICI	225 L/emp/d	
Industrial	295 L/emp/d	
Commercial	175 L/emp/d	
Institutional	220 L/emp/d	
Peaking Factors		
Parameter	Current – 2022 DC Background Study	Proposed Design Criteria
Max Day Lake-based	1.9	1.9
Max Day Groundwater Based	1.6	1.6
Peak Hour Lake-based	3	3
Peak Hour Groundwater Based	3	3

**Wastewater**

Treatment Design Criteria		
Average Day Flow Parameter	Current – 2022 DC Background Study	Proposed Design Criteria
Residential	360 L/capita/day	320 L/capita/day
Blended ICI	310 L/emp/d	
Industrial	405 L/emp/d	
Commercial	245 L/emp/d	
Institutional	305 L/emp/d	
Pumping Station and Mains Design Criteria		
Dry Weather Flow Parameter	Current – 2022 DC Background Study	Proposed Design Criteria
Residential	215 L/capita/day	185 L/emp/d
Blended ICI	185 L/emp/day	
Industrial	240 L/emp/day	
Commercial	145 L/emp/day	
Institutional	180 L/emp/day	
Inflow & Infiltration Allowance	0.286 L/s/ha	0.28 L/s/ha
Peaking Factor	Harmon Formula	Harmon Formula

**Water Servicing Analysis**

Per meeting with the Town and Region on March 6, 2026. It was acknowledged that this existing baseline information is provided in the Region's IMP and therefore does not need to be presented by Crozier.

		<p>An in-depth analysis of the existing baseline capacities within the water distribution network is required to be conducted and included in a report, including a review of:</p> <ul style="list-style-type: none"> <li>• Watermains</li> <li>• Booster pumping stations</li> <li>• Storage facilities</li> <li>• Pressure zones</li> </ul> <p>Regional staff require the analysis to be performed using the Region’s most recent water hydraulic model and include scenarios that reflect development phasing. This will identify any existing limitations in the system, such as:</p> <ul style="list-style-type: none"> <li>• Storage capacity</li> <li>• Supply availability</li> <li>• Pressure levels</li> <li>• Fire flow capacity</li> </ul> <p>The results will identify areas that may require upgrades to accommodate the development. The updated water consumption forecasts are required to be integrated into the water distribution system hydraulic model and water demand scenarios are required to be simulated to reflect development phasing.</p> <p>With the updated hydraulic model, a comprehensive water servicing strategy can be developed. This must include both local and Regional Development Charge infrastructure within the study area and beyond, extending into the larger pressure zone and broader water distribution system. Linear infrastructure must follow road alignments (where feasible) to allow for construction within municipal right-of-ways and the preferred public realm and mobility network must be considered.</p> <p>A working copy of Halton Region’s most recent water hydraulic model can be acquired through <a href="mailto:harequests@halton.ca">harequests@halton.ca</a>. Water hydraulic modeling conditions to be modelled and discussed in a report include:</p> <ul style="list-style-type: none"> <li>• Average Day Demand</li> <li>• Maximum Day Demand</li> <li>• Peak Hour Demand</li> <li>• Maximum Day Demand plus Fire Flow</li> </ul> <p><b>Wastewater Servicing Analysis</b></p> <p>An analysis of the existing baseline capacities within the wastewater collection system is required to be undertaken in a report, including the following:</p> <ul style="list-style-type: none"> <li>▪ Sewers</li> <li>▪ Wastewater pumping stations</li> <li>▪ Forcemains</li> <li>▪ Maintenance Holes/Chambers</li> </ul>	<p>Per meeting with the Town and Region on March 6, 2026. It was acknowledged that this existing baseline information is provided in the Region’s IMP and therefore does not need to be presented by Crozier.</p>
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			<p>Regional staff require the analysis to be performed using the Region’s most recent wastewater hydraulic model and is to be simulated to reflect development phasing. The analysis must evaluate system limitations in terms of:</p> <ul style="list-style-type: none"> <li>• Capacity utilization (sewers, and wastewater pumping stations)</li> <li>• Surcharging</li> <li>• Self Cleansing Velocity</li> <li>• Basement Flooding Risk</li> </ul> <p>The results will identify areas that may require upgrades to accommodate the development. The updated wastewater generation must be integrated into the wastewater collection system hydraulic model and wastewater generation scenarios must be simulated to reflect development phasing.</p> <p>With the wastewater collection system hydraulic model updated, the wastewater servicing strategy can be developed. The strategy must outline necessary local and Regional Development Charge infrastructure both within the study area and beyond, extending into the larger catchment area and broader wastewater collection system. Linear infrastructure must follow road alignments (where feasible) to allow for construction within municipal right-of-ways and the preferred public realm and mobility network must be considered.</p> <p>A working copy of Halton Region’s most recent wastewater hydraulic model can be acquired through <a href="mailto:harequests@halton.ca">harequests@halton.ca</a>. Wastewater hydraulic modeling conditions to be modelled and discussed in a report include:</p> <ul style="list-style-type: none"> <li>• Dry Weather Flow</li> <li>• Wet Weather Flow</li> </ul>	
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**Area Servicing Plan Comments**

#	Category	Assigned To	Comment	Response:
	Area Servicing Plan Comments	CROZIER	As noted above, the Region provided detailed TOR comments through the pre-submission process to inform any technical study and to ensure that the information provided through any study/report meets regional requirements and standards. In considering the submitted servicing studies Staff note that detailed technical TOR comments have not been addressed and/or incorporated into the report provided. Given this, Staff are unable to provide detailed comments and/or a recommendation on the conclusions of the Area Servicing Plan (ASP) from a servicing and capacity perspective. We therefore recommend that the ASP be updated to address our TOR comments.	Comments on the ASP TOR have been considered as part of this submission. Please refer the comment responses above.
1	Water and Wastewater Design Criteria	CROZIER	The water and wastewater analyses in the ASP rely on outdated design criteria. All ASPs and related studies must apply the most recent Regional criteria developed through the Integrated Master Plan. Using the latest criteria ensures servicing strategies and infrastructure sizing are consistent with the Region’s long-range planning assumptions and methodologies. Outdated criteria introduce misalignment with Regional servicing strategies and increase the risk of undersized or oversized infrastructure.	The criteria in this submission has been updated to match the criteria listed in the TOR comments.

2	Population and Employment Projections	CROZIER	<p>Population and employment projections must be based on the most accurate information available. The ASP currently applies generic density assumptions even though more precise development information is available for certain portions of the Study Area. Using densities instead of known development inputs can overestimate water demands and wastewater flows, which directly affects the validity of hydraulic modelling and resulting infrastructure sizing.</p> <p>Although the Study Area is outside the current Urban Area, it would still be beneficial for the ASP to reference the Joint Best Planning Estimates at key planning horizons. Including this information will support integration of future growth assumptions into Integrated Master Plan hydraulic modelling.</p>	<p>Per the meeting with the Town and Region on March 6, it was agreed that the density within Rice's site will be accurate based on their development, however the remainder of the Study Area will have a generic assumption applied.</p> <p>Per the meeting on March 6, the Town and Region were to discuss the Joint Best Planning Estimates. It was confirmed there is no action for Crozier on this item.</p>
3	Water and Wastewater Hydraulic Modelling	CROZIER	<p>Updated models must accompany the next ASP submission for Regional review and validation. The hydraulic models will need to be updated and rerun using the latest Integrated Master Plan design criteria, given that the current analyses were based on outdated assumptions. Additional modelling scenarios are required as well (2031, 2041 and 2051 or be aligned with the anticipated development phasing for the Study Area), including 5-year and 10-year wet weather events, updated proposed flows and demands, and FUS fire flow checks. These updates are essential to ensure that model outputs align with the Region's current hydraulic modelling and to accurately assess impacts on existing and planned infrastructure.</p> <p>All updated water and wastewater models that were amended to carry out the analysis for the ASP and S&amp;SWMR shall be provided to the Region.</p>	<p>The updated ASP utilizes the latest models from the Region.</p> <p>Updated models have been included as part of the submission.</p>
4	Existing Water and Wastewater Infrastructure	CROZIER	<p>The ASP should also describe key system components that are required to service the Study Area from a water and wastewater perspective, which would include the Mid-Halton Wastewater Treatment Plant, the servicing water pressure zone, associated supply and storage facilities, and any planned upgrades identified through the Integrated Master Plan. Providing this context is necessary to understand system impacts and ensure the proposed servicing strategy aligns with broader Regional infrastructure planning.</p>	<p>Where the information is available, system components have been described in further detail.</p>
5	Servicing Extensions	CROZIER	<p>The ASP should include detailed analysis of all proposed servicing extensions indicating that these extensions will occur to the limits of each parcel subject to the development considerations.</p>	<p>Servicing proposed is shown to extend to the limit of all parcels within the Study Area.</p>
Additional Comments		CROZIER	<p>In addition to the above, in Appendix 'A' to this letter we have provided additional comments that should be reviewed and considered as part of the update to the servicing studies.</p>	<p>Please see comment responses provided directly in the excel comment table provided by the Region.</p>

**Commented [JS6]:** Can the Region please share this?

**Commented [JS7R6]:** Rice to be accurate based on proposed development & generic for the remainder is fine

**Commented [JS8]:** Can the Joint Best Planning Estimates be provided?

**Commented [JS9R8]:** Town & Region to discuss - no action at this time

**Commented [JS10]:** Email from Mickey Liu

**Commented [JS11R10]:** Region to confirm what model to use

**Commented [JS12]:** Can you please send the Integrated Master Plan?

**Commented [JS13R12]:** Expected end of March

**Commented [JS14]:** Please clarify what is required beyond what was provided in the ASP

**Commented [JS15R14]:** Extend to limit of all parcels

Servicing Study & Scoped Subwatershed Study (SWS) Comments				
#	Category	Assigned To	Comment	Response:
1	GENERAL	CROZIER	Staff have reviewed and considered the Servicing and Stormwater Management Report (FSR) based upon regional requirements and standards. Acknowledging that updates to this report may be required once the ASP has been finalized and approved by the Region we offer the following comments.	Noted.
2	GENERAL	CROZIER	The report refers to how the owner's Professional Engineer foresees how the proposed development and buildings are to be serviced. Currently the FSR cannot be accepted; the applicant will be required to submit an updated FSR to address the following prior to Regional approval. In updating the FSR the Consulting Engineer should reference the Regional Municipality of Halton Water and Wastewater Linear Design Manual Version 7, dated December 2025.	Noted. The FSR has been updated to reference the Water and Wastewater Linear Design Manual Version 7.

3	Watermain Analysis	CROZIER	<p>Watermain analysis: To confirm the existing watermain system can accommodate the proposed development; hydrant flow testing will be required prior to approval of the FSR submission. The applicant is required to provide the following:</p> <ol style="list-style-type: none"> <li>Expected static pressures.</li> <li>Required fire flows.</li> <li>Expected fire flows.</li> <li>Fire Flow Certification Letter that is signed and stamped by a professional engineer that states the theoretical flow rate at a pressure of 20 psi.</li> </ol> <p>Ideally these would be obtained through a more current hydrant flow test of the in the vicinity of the development with the results obtained submitted as part of the FSR supporting documentation.</p>	The existing watermain system has been assessed using the latest InfoWater model received from the Region – refer to the ASP.
4	Wastewater Analysis	CROZIER	<ol style="list-style-type: none"> <li>Outline of existing sanitary sewer system with any downstream constraints. Provide Sanitary sewer design sheets as part of this analysis.</li> <li>Please use an Inflow/Infiltration Allowance rate of 0.28 x 10<sup>-3</sup> m<sup>3</sup>/ha/s</li> <li>Isolated Sanitary Area Drainage Plan.</li> </ol>	This information is provided within the Area Servicing Plan, which is provided under a separate cover, and referenced in the FSR.
5	Water Allocation	CROZIER	Please note that while a Water Usage and Sanitary Discharge Report for the Development site was not provided at this stage, water allocation from the Town of Halton Hills is not required as the site is situated within the Lake-based system and ICI developments are currently not subject to a Regional Allocation program within that system. Staff recommends that a Water Usage and Sanitary Discharge Report accompany the ASP and FSS as part of a resubmission.	Noted. A Water Usage and Sanitary Discharge Report has been completed for the Site and appended to the FSR.
6	Stormwater Management	CROZIER	Staff have reviewed the FSR as it relates to regional standards and requirements. While the current design has addressed the region's standards and requirements as it relates to impacts on Regional Road 25, we will continue to review submission to ensure that these standards are maintained should the development plans change.	Noted.
7	Well Monitoring & Interruption	CROZIER	In considering the submitted Scoped Subwatershed Study, Staff note that specific reference to, and implementation of Appendix 'A' to the Region's Urban Services Guidelines should be addressed as part of any update to this study.	SSWS is not submitted as part of this submission.
8	Closing Remarks (Municipal Services)	CROZIER	Given the above, Staff note that updates to the ASP and FSR are required in order to provide sufficient information for the Region to undertake a fulsome analysis and to allow the Region to provide sufficient direction to the Town on these planning matters.	Noted.
<b>Regional Transportation</b>				
#	Category	Assigned To	Comment	Response:
1	GENERAL	CROZIER (MIKE)	<p>In accordance with the MOU and to support an effective Regional transportation network, Halton Region provides the following comments from a transportation perspective.</p> <p>As part of the 1st submission for this OPA and ZBA the Region has received and reviewed the following traffic study: Transportation Impact Study, C.F. Croziers &amp; Associates Inc., November 2025. This report has been considered from a Regional Road network perspective and based upon our Terms of Reference comments provided to the Town in October 2025. The following comments are provided, as additional information is required for the Region to understand what impact the proposed new urban area may have upon the surrounding regional road network. We offer the following for the Town's consideration:</p>	Noted. Region TOR response was provided after first submission.
2	Urban Area Expansion Comments	CROZIER (MIKE)	In review of the submitted TIS, Staff note that the detailed technical comments and information provided as part of the Terms of Reference Review process have not been addressed. Therefore, Staff are not able to provide a fulsome assessment of this study. We offer the following high-level comments at this time:	
		CROZIER (MIKE)	<ul style="list-style-type: none"> <li>Study Area: Does not meet Town/Region requirements; key intersections omitted - including higher order or all-ways stop intersections critical to future operations. This is important to understand what impacts/improvements may be</li> </ul>	

			required in order to support the proposed Urban Area Expansion and commercial/industrial use as these uses were not contemplated as part of previous regional transportation planning exercises.	
		CROZIER (MIKE)	<ul style="list-style-type: none"> <li>Data Quality: Outdated proxy data used (pre-2020); assumptions are not reflective of current growth patterns or regional travel behaviour.</li> </ul>	TO DISCUSS FURTHER – trip generation forecast not trip distribution
		CROZIER (MIKE)	<ul style="list-style-type: none"> <li>Catchment Area: The TIS assumed a ~11 km catchment which in Staff’s opinion significantly underestimated the true catchment area. Staff note that the catchment area likely extends well beyond the Town of Halton Hills boundary (e.g., Milton, Erin, parts of Halton Hills).</li> </ul>	TO DISCUSS FURTHER
		CROZIER (MIKE)	<ul style="list-style-type: none"> <li>Horizon Years: The TIS analysis limited a horizon year to ~5 years; typical expectation is 10+ years horizon year is expected/provided as part of a TIS</li> </ul>	TO DISCUSS FURTHER – CONTRADICTS TOR RESPONSE
		CROZIER (MIKE)	<ul style="list-style-type: none"> <li>Trip Generation: High pass-by assumptions (~30%) resulting in major trip reductions; significant reduction in net trips (hundreds of trips removed), which materially affects results.</li> </ul>	TO DISCUSS FURTHER
		CROZIER (MIKE)	<ul style="list-style-type: none"> <li>Traffic Count/Data: The TIS has used traffic count dates that do not appear to be fully consistent with industry standards and the comments provided by the Region as part of the TOR process.</li> </ul>	TO DISCUSS FURTHER
		CROZIER (MIKE)	<ul style="list-style-type: none"> <li>Network Assumptions: Road widenings and roundabout geometry are not aligned with confirmed Regional plans; roundabout geometries appear inconsistent with planned designs.</li> </ul>	Noted. Planned design was provided after first submission.
		CROZIER (MIKE)	<ul style="list-style-type: none"> <li>Additional Assumptions: The TIS did not provide development potential (assumptions) for 9056-9092 Regional Road 25 (lands at the northwest corner of No. 5 Side Road and Regional Road 25). This is important as any expansion for the Urban Area for 9094 Regional Road 25 would incorporate and include 9056-9092 Regional Road 25 as part of the Urban Area thereby increasing development/trip generation potential for these lands. Additionally, access consideration for these lands needs be addressed as part of the TIS.</li> </ul>	TO DISCUSS FURTHER
		CROZIER (MIKE)	<ul style="list-style-type: none"> <li>Detailed Municipal Class Environmental Assessment (MCEA) Analysis: The TIS should include a section that considers the implications of the proposed development on the intersection and roadway design of the Preferred Concept being advanced as part of this ongoing Study for Regional Road 25 (from 5 Side Road to 10 Side Road).</li> </ul>	Discuss already included in TIS regarding widening.
3	TIS	CROZIER (MIKE)	Given the above, Staff recommend that the TIS be updated to incorporate the October 2025 TOR comments provided by the Region and the Town. This will ensure that the data and assumptions provided in the TIS can be relied upon thereby giving the Region sufficient information to understand what Regional road network improvements may be required to support the proposed Urban Area Expansion. Lastly, the conclusions of an agreed upon TIS will provide the basis for the Region and Town to understand cost associated with the required works, timing of those works, and how the works will be funded (e.g. Region, Town or developer funded works).	Noted.
4	ATP	CROZIER (MIKE)	In addition to the above and given development proposals in the vicinity of the subject lands, Staff continue to recommend a more comprehensive analysis of the area and development proposals in this area consistent with our Area Transportation Plan comments provided as part of the Pre-Consultation process.	Noted.
5	Additional Comments	CROZIER (MIKE)	Please note that Appendix ‘B’ includes reference to additional materials and/or studies that should form part of any update to the TIS and future implementation processes (if applicable).	Noted.
6	Development Specific Comments	CROZIER (MIKE)	As noted above, the proposed development would permit the expansion of the Urban Area in the Town of Halton Hills to permit the development of a mixed-use commercial/industrial development. The implementation portion of the development applications (i.e. proposed land-use designation and zoning) will require additional analysis and updates to the development plans to address various matters (including the conclusions of the finalized TIS prepared as part of the Urban Boundary Expansion portion of this proposal). The updated plans and materials will also need to address the matters identified in Appendix ‘B’ to this letter. These matters include:	Noted.
		CROZIER (MIKE)	Updated Traffic Analysis to support detailed design and engineering requirements (Note: this may include safety and operational analysis)	Noted.
		CROZIER	Detailed Civil Plans that address and implement the recommend road improvements	Noted.

		CROZIER (MIKE)	Survey that depicts the Centreline of the Original Right of Way for Regional Road 25 and any required land dedications from the subject lands	
		CROZIER (MIKE)	Updated analysis to further justify/support deviations from the Region's standards (e.g. access spacing, etc.)	Noted.
7	Closing Remarks (Regional Transportation)	CROZIER (MIKE)	Based upon the above, Staff are unable to provide direction on the impact of the proposed development on the region's road network at this time. An update to the TIS is required to provide the Region with sufficient information to complete this assessment.	Noted.
<b>Waste Management</b>				
#	Category	Assigned To	Comment	Response:
1	GENERAL	RICE GROUP	The proposed development is not eligible for Waste collection provided by Halton Region. Therefore, private Waste collection must be provided for all Industrial, Commercial and Institutional locations. For Waste diversion requirements for the Industrial, Commercial and Institutional sectors, refer to Environmental Protection Act, O. Reg. 102/94 "Waste Audits and Waste Reduction Work Plans" and Environmental Protection Act, O. Reg. 103/94 "Industrial, Commercial and Institutional Source Separation Programs" or legislation that supersedes those Regulations.	Noted.
2	GENERAL	RICE GROUP	Industrial developments and commercial developments must be designed to accommodate for containerized Waste collection specific to the development's operational Waste collection needs and should include Waste diversion.	Noted.
3	GENERAL	RICE GROUP	Each Commercial Unit must have provision for adequate Waste storage.	Noted.
4	GENERAL	RICE GROUP	Regional development application comments provided by Waste Management are based on the current state of Halton Region levels of service available January 9th, 2026. Levels of service are subject to budget and Council approval.	Noted.
<b>Finance</b>				
#	Category	Assigned To	Comment	Response:
1	GENERAL	RICE GROUP	The Owner will be required to pay all applicable Regional Development Charges in accordance with the Development Charge Act and the Region of Halton Development Charge By-law(s), as amended. Please visit our website at <a href="https://www.halton.ca/The-Region/Finance-and-Transparency/Financing-Growth/Development-Charges-Front-ending-Recovery-Payment">https://www.halton.ca/The-Region/Finance-and-Transparency/Financing-Growth/Development-Charges-Front-ending-Recovery-Payment</a> to obtain the most current Development Charge and Front-ending Recovery Payment information, which is subject to change.	Noted.
2	GENERAL	RICE GROUP	If located outside Halton's DC By-law map but Regional water/wastewater services are available, water/wastewater DCs would be applicable, as per section 17c of current Regional DC bylaw.	Noted.
<b>Source Water Protection</b>				
#	Category	Assigned To	Comment	Response:
1	GENERAL	RICE GROUP SOIL ENG	The subject lands are located within the jurisdiction of the Halton-Hamilton Source Protection Plan (SPP). The Halton-Hamilton SPP can be accessed online at: <a href="https://www.conservationhalton.ca/source-water-protection/">https://www.conservationhalton.ca/source-water-protection/</a> . The property is partially located in a Highly Vulnerable Aquifer.	Noted
2	GENERAL	RICE GROUP	The proposed application is not located in a Wellhead Protection Area (WHPA) or Issue Contributing Area (ICA) – no source protection policies apply to this application. Therefore, the application can proceed from the perspective of Source Water Protection and no S.59 notice will be required.	Noted.
3	GENERAL	RICE GROUP	Attached to this letter is reference material for the proponent related to the Source Water Protection program and the important role landowners play in protecting drinking water sources.	Noted.
<b>Regional Contaminated Sites Database</b>				
#	Category	Assigned To	Comment	Response:
1	GENERAL	SOIL ENG	In order to maintain the Region's Contaminated Sites Database, Regional staff request final copies of all environmental reports including: Geotechnical Studies, Hydrogeological Studies, Phase One and/or Two Environmental Site Assessments, Remediation Reports, Risk Assessments, Record of Site Condition (RSC), and/or Certificate of Property Use (CPU).	Noted.