

January 31, 2022

Township of Cavan Monaghan

Cavan Monaghan Municipal Office,
988 County Rd 10
Millbrook, ON
LOA 1G0

Attention: John Connolly, Executive Director, Planning & Development

County of Peterborough

470 Water Street
Peterborough, ON
K9H 3M3

Attention: Iain Mudd, Manager of Planning

**RE: 787 and 825 Fallis Line in the Township of Cavan Monaghan
County File: 15T-21007 & Town File: ZBA-09-21, OPA-03-21
OPA, ZBLA, DPS re-submission
TBG Project No. 20697**

On behalf of our client, CSU Developments Inc., The Biglieri Group Ltd. ("TBG") is pleased to re-submit Local Official Plan and Zoning By-law Amendment as well as Draft Plan of Subdivision Applications for lands located at 787 and 825 Fallis Line in the Township of Cavan Monaghan ("Subject Site"). The following cover letter provides a list of documents being re-submitted to both municipalities. It also provides responses to select planning comments from the Township of Cavan Monaghan which required a long form response. Lastly, please note that the project team has prepared a Consolidated Response to Comments Chart document, which should be reviewed by all commenting parties with respect to responses to their comments.

SUPPORTING DOCUMENTS

As part of the re-submission, please find enclosed the following:

- Ten (10) copies of this cover letter including further planning analysis and revisions to the Draft OPA and ZBLA (5 copies to County, 5 copies to the Township);
- Three (3) copies of the updated Township Official Plan Amendment Application form;
- Twenty (20) full size copies of the Draft Plan, prepared by The Biglieri Group Ltd., (15 copies to County, 5 copies to the Township);
- Five (5) copies of the Draft Plan prepared by The Biglieri Group Ltd., reduced to 8.5 x 14 – Submitted to the County;
- Six (6) copies of the Draft Plan prepared by The Biglieri Group Ltd., reduced to 8.5 x 11 – (3 copies to County, 3 copies to the Township);
- Ten (10) copies of the revised Agricultural Impact Assessment, prepared by Clark Consulting Services Ltd. and dated October 12, 2021 (5 copies to County, 5 copies to the Township);
- Ten (10) copies of the Environmental Impact Study-Addendum, prepared by GHD Ltd. And dated December 17, 2021 (5 copies to County, 5 copies to the Township);
- Ten (10) copies of the Functional Servicing Report, prepared by Valdor Engineering Inc., and dated January 2022 (5 copies to County, 5 copies to the Township);

- Ten (10) copies of the ESA, Geotechnical & Hydrogeological Response to Comments Letter, prepared by GHD Ltd., and dated 18 January, 2022 (5 copies to County, 5 copies to the Township);
- Ten (10) copies of the revised Traffic Impact Study, Prepared by Asurza Engineers Ltd., and dated January 31 2022;
- Ten (10) copies of the Supplementary Memo (Re: Traffic Impact Study Report – January 31 2022), Prepared by Asurza Engineers Ltd., and dated February 2, 2022; and,
- Ten (10) copies of the Consolidated Response to Comments Chart, prepared by the project team and compiled by the Biglieri Group, and dated February 2, 2022.

LONG FORM RESPONSE TO COMMENTS FROM THE TOWNSHIP OF CAVAN MONAGHAN

Comment 3.0

The proposed development will expand the Millbrook Settlement Area by a significant amount and while the Planning Rationale Report (PRR) identifies this, more information and a greater justification needs to be provided to address why the expansion and why here?

Comment 4.0

The expansion is less than 40ha (i.e., just under 31 ha) and outside of a Municipal Comprehensive Review but the justification of the proposed expansion into the Agricultural designation needs to address if reasonable alternatives have been evaluated. Minor expansions have been approved elsewhere but there is concern of the cumulative impact of all these expansions without enough justification.

It should be noted at the onset that the TBG Planning Rationale Report, dated July 2021, included a policy-by-policy review of the PPS and Growth Plan tests related to adjustments of Settlement Area boundaries outside of a comprehensive review including PPS policies 1.1.3.9 a)-d) and Growth Plan policies 2.2.8.5 a)-e). Please refer to the original planning rationale report for this analysis which commences on page 8 of the report and concludes at page 19. The responses below should be considered supplementary information and read in conjunction with the rationale and analysis included in the July 2021 Planning Rationale Report.

GMS

As a foundational element of the requested expansion, it should be stated at the onset that the Cavan Monaghan Growth Management Study identifies the need for an additional 178ha (440 acres) of Settlement Area expansion up to the year 2041. Further, the GMS materials identify the Subject Site as a “locational option to address residential land needs” in Figure 8-1. As such, the proposed Settlement Area expansion will help Cavan Monaghan efficiently and effectively meet housing supply demand in the next 5 – 10 years, while promoting an efficient urban landscape that maintains a strong connection to the Natural Heritage systems in vicinity.

Agricultural Considerations

Please refer to the AIA prepared by Clark Consulting as well as the original Planning Rationale Report. In addition to the analysis located there-in with respect to the specific tests of the Growth Plan and PPS; TBG provides the following supplementary analysis. As can be seen in Figure 1 below, the Millbrook Settlement Area is largely surrounded by Prime Agricultural Areas (per OMAFRA) to the north, east, south and west. The only location where Prime Agricultural Areas are not found immediately adjacent to the Settlement Area boundary is south-west of the Settlement Area. However, these lands south-west of the Settlement Area are included within the MNRF's Natural Heritage System (also see Figure 1 below). As such, any future expansion of the Millbrook Settlement Area (as will be required to support the projections of the Growth Plan to 2041, and therefore also to 2051), will necessarily involve expansion into Prime Agricultural lands.

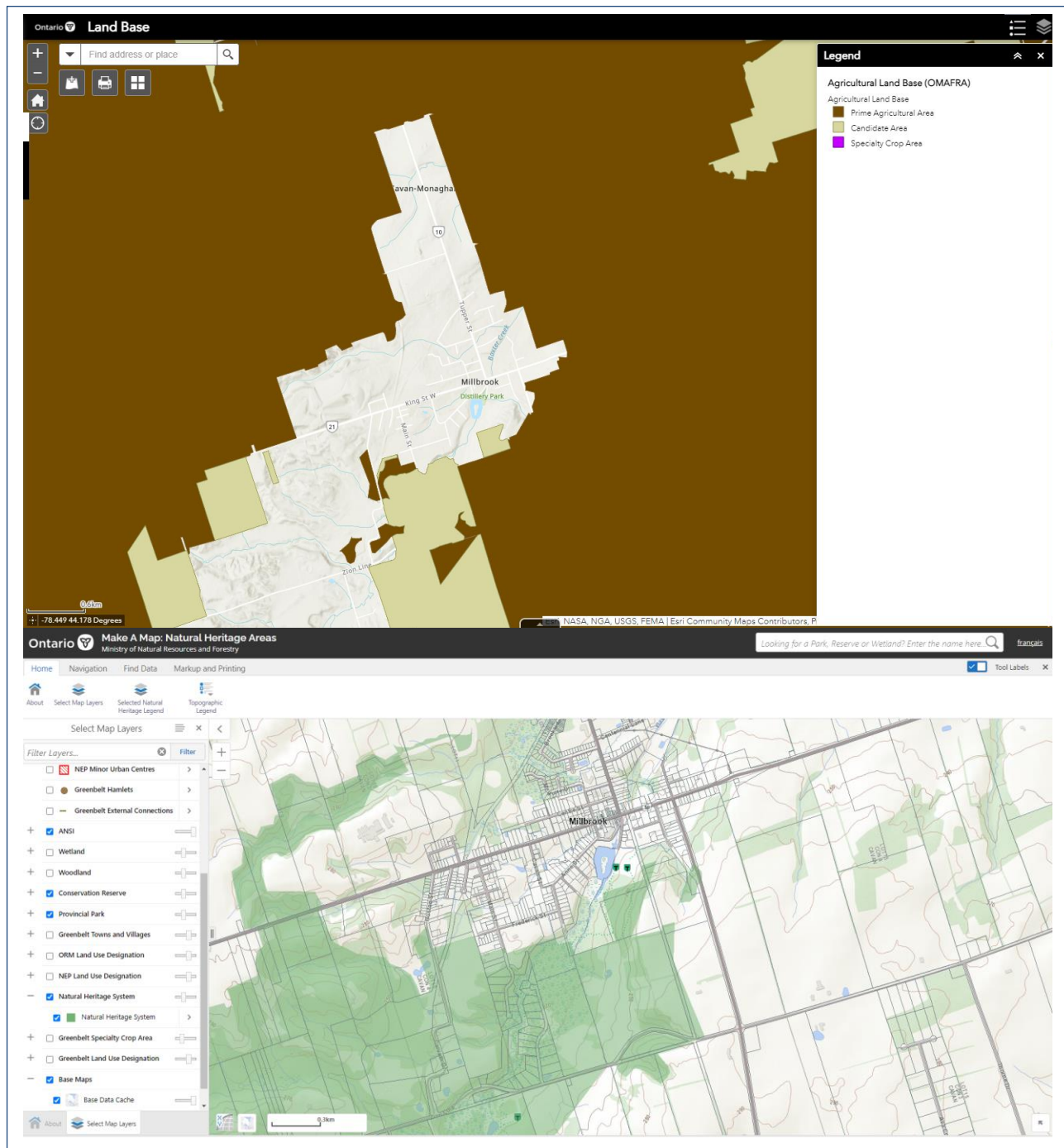


Figure 1 – Agricultural Land Base (OMAFRA) & Natural Heritage Areas (MNR) - Millbrook

Leapfrogging & Rounding Out

Consideration of other sites for residential development outside of the Settlement Area have been made. Any potential location which involves leapfrogging from existing developed urban lands, over Agricultural or Natural Heritage System Lands, or leapfrogging lands which are within the boundary but not currently developed, should immediately be discounted as leapfrog development. Such leapfrogging will encourage other parties to develop the greenfield spaces in-between resulting in more agricultural lands being impacted and requiring costly servicing extensions. This discounts much of the lands to the north-east, north-west, south-west and south-east. In addition, lands to the west of the subject site are within the Oak Ridges Moraine and Greenbelt plan and are not suitable for residential development per the policies of those provincial plans. As such, a westward expansion of the

Settlement Area would represent a logical rounding out of the western portion of the Millbrook Settlement Area to the ORM boundary and would be located immediately adjacent to existing residential development to the east (therefore not promoting leapfrog development) and planned and approved residential and institutional development to the north.

Adjacencies

The adjacent development of the Master Planned communities of Towerhill North and South creates a pre-existing urban form, allowing for creation of a more contiguous urban form in the town of Millbrook. The proposed development of the Subject Site will contribute to the creation of a well laid out community through the continuation of the street grid in the extension of Pristine Trail within Towerhill South and potential for future connection to Towerhill North via the future Right of Way at Block 376. This road will intersect with proposed "Street L" of Towerhill North. Furthermore, the Subject Site can be connected to current infrastructure which services the Towerhill North and South communities, and the town of Millbrook at large. Alternative sites in Millbrook would not be as proximate to existing capital works undertaken to support the Towerhill North and South developments and would therefore require additional capital work to expand existing networks, whereas the Subject Site is adjacent to the two newly serviced Master Planned communities. As such, the proposed settlement boundary expansion will contribute to an efficient Settlement Area and a uniform urban landscape in Northern Millbrook.

"Swapping"

The developable portions of the Subject Site are located directly north and west of the current Settlement Area boundary. To the east of the Subject Site, within the Settlement Area, is the Towerhill South master planned community. Directly south of the developable portion of the Subject Site, the southern portions of the Site itself are within the Settlement Area and designated *Natural Linkage Area* and *Natural Core Area* (Cavan Monaghan Official Plan, Schedule A1). The lands within the Settlement Area, in the southern portion of the Subject Site, are approximately 16ha in size and do not permit for development due to their current Official Plan land use designation and associated environmental features. The proposal seeks to include ~20ha of residential lots and blocks within the Settlement Area, while respecting the *Natural Linkage Area* and *Natural Core Area* designations.

Conclusion

The requested Settlement Area boundary expansion represents good planning in that it acts as an extension to the master planned Towerhill communities located to the north and east. Development of the Subject Site will create a continuous community which will be serviced by the recently constructed Cavan Monaghan Community Centre and existing infrastructure (Water, Sewage, etc.). Furthermore, this continuous urban landscape does not constitute leapfrogging undeveloped, agricultural, or natural heritage lands, helping to mitigate the impacts of sprawl, and create a denser urban landscape while also satisfying market demand for residential development as identified in the Cavan Monaghan Growth Management Study. Lastly, the development represents a logical rounding out of the Millbrook Settlement Area to the ORM boundary (to the west).

Comment 5.0

The medium density Blocks (372 & 373) do not look big enough to accommodate the proposed 5 storeys when taking into consideration requirements for parking, loading, etc. Further explanation is required. If medium density of 5 storeys is not possible, could local commercial be located in one of both of these blocks? Is something else being considered?

Comment 6.0

Current OP only permits three (3) storeys and while 4 storeys was just approved for Towerhill North, why 5 storeys here?

Comment 7.0

Township will consider four (4) storey developments in apartment blocks provided fire prevention and safety measures are implemented during construction (as noted previously). The current building height needs to be addressed in the official plan amendment application and PRR.

Comment 8.0

The PRR needs to provide more information and detail about the 200 units in the 2 medium density blocks. What is the proposed built form, timing (i.e., phasing)?

Comment 9.0

Location of medium density and 5 storeys may be a concern for location along Fallis Line West.

Firstly, TBG agrees that fire prevention and safety measures will need to be implemented during construction and assumes this will be a condition of Site Plan approval in the future. Secondly, with the introduction of an additional future right of way connection to Fallis Line (at Block 376), Block 377 is now the only Medium Density Block. The proposed apartment building will be the last phase of development and the use will be residential. Per staff comment the apartment building height has been reduced to 4 storeys and is now consistent with planning approvals granted at the Towerhill North Site. The Draft OPA has been revised to include an amendment to maximum height - see Appendix 3 to this letter. This height allows for intensification of the site and provision of smaller, and therefore inherently more affordable units within the draft plan. However, the four-storey height remains compatible with the low-rise scale of the neighbourhood (heights above 4-storeys are typically considered mid-rise). Further the additional height will not block the southern exposure of the townhouse blocks to the south and the building itself will be significantly set back from the southern property line. This will negate shadowing and overlook concerns. The location of higher density uses along the arterial road (Fallis Line) will also reduce traffic on local streets and provide for additional separation to lower density housing forms.

Figure 2 below shows a conceptual design for the medium density block (for discussion purposes only). Figure 2 shows a 4-storey apartment building 120m in length running parallel to Fallis Line with an 18m width for a floor plate of ~2,160m² and a gross floor area of ~8,640m² resulting in a lot coverage of 25%. Parking is proposed to be located at the surface in the rear and internal side yard; where-as outdoor amenity space is proposed in the front yard (being the western property line). Appropriate setbacks and landscape strips are also provided. In terms of vehicular access, the concept plan shows access from a local road, being 'Street G'. The design maintains flexibility to accommodate a secondary emergency exit on Fallis Line if requested through the site plan approval process.

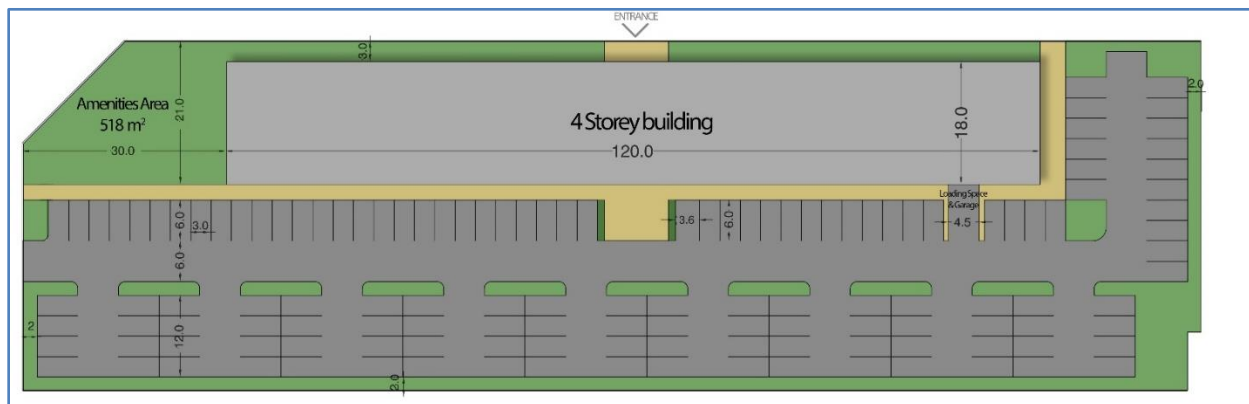


Figure 2 - Conceptual Midrise Block

Comment 10.0

How will affordable housing issue be addressed? Planning Justification Report indicates that the – subdivision has been designed with a full range of residential uses inclusive of single-detached and townhouse dwellings along with medium density residential blocks which may include apartment dwellings or other forms of medium density housing. More details are required on the latter proposed development as well as any information regarding affordable housing.

The Cavan Monaghan Official Plan defines Affordability as:

- (a) “in the case of ownership housing, the least expensive of housing for which the purchase price results in annual accommodation costs which do not exceed 30 percent of gross annual household income for low and moderate income households; or housing for which the purchase price is at least 10 percent below the average purchase price of a resale unit in the regional market area;
- (b) in the case of rental housing, the least expensive of: a unit for which the rent does not exceed 30 percent of gross annual household income for low and moderate income households; or a unit for which the rent is at or below the average market rent of a unit in the regional market area.”

The proposed development will provide affordable housing within Block 377 per the affordable threshold outlined in the official plan.

Comment 11.0

How does this plan address the employment targets (Section 2.1.3)?

“2.1.3 Employment Targets

The Township will promote economic development and more employment opportunities within the community. This goal will be achieved by:

- a) Targeting an employment to population ratio of 1 job for every 3 people;
- b) Directing new employment opportunities primarily to the designated Employment Areas;
- c) Encouraging the development of privately serviced Employment Areas in the vicinity of major transportation facilities, and fully serviced Employment Areas in Millbrook; and,
- d) Encouraging continued employment in agricultural and resource sectors by promoting diversification and protecting resources.”

Per 2.1.3 (b) above, the employment portion of 2.1.3 (a) will primarily be directed to Employment Areas (located along Country Rd. 10 between Larmer Line and Fallis Line). The City's land needs assessment identified the need for additional residential lands within Millbrook - which is what this proposal accommodates. However, in the long term, the increased population from the development will assist in attraction of additional commercial and employment uses/users to Millbrook's currently vacant employment and commercial lands. Further, these vacant employment and commercial lands will be accessible from the proposed development via active transportation given the development's proximity.

CONCLUSION

We trust you will find all in order, however if you have any questions or require additional information, please contact us at your earliest convenience.

Respectfully,
THE BIGLIERI GROUP LTD.



Anthony Biglieri, RPP, MCIP
Firm Principal



Michael Testaguzza, RPP, MCIP
Senior Planner

Lorin Komers
Planner

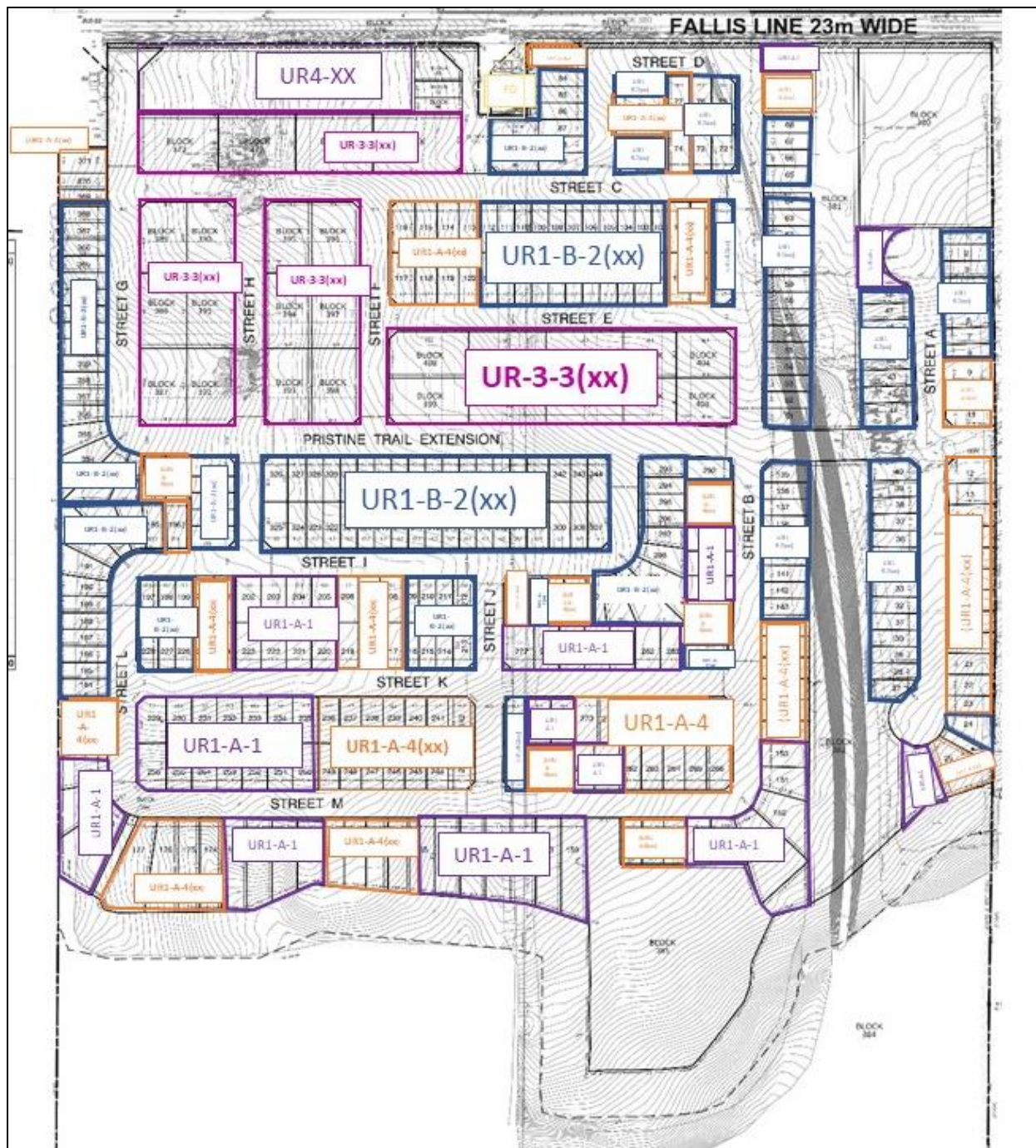
APPENDIX 2 – REVISIONS TO LIST OF ZONING BY-LAW AMENDMENTS

Proposed Zoning By-law Amendments

Zone provision	UR1-B-2 (xx) (35 ft lots)	UR1-A-4 (xx) (45 ft lots)	UR1-A-1 (52 ft lots)	UR3-3 (xx) Townhouses (24 ft lots)	UR4(xx)
Min lot area (m ²)	320	411	475	225 per unit	No change
Min. lot frontage (m) Regular	10.6	13.7	15.8	20 Block frontages 7.5	No change
Min. lot frontage (m) Corner	12.4	15.2	17.3	N/A	No change
Min. Front Yard (m)	4.5 ⁽¹⁾	4.5 ⁽¹⁾	6 ⁽¹⁾	4.5 ⁽¹⁾	No change
Min. Interior Side Yard (m)	1.2/0.6	1.2/0.6	1.2/0.6	0.0 or 1.2	No change
Min Exterior Side Yard (m)	2.5	2.5	2.5	2.5	2.5m
Min. Rear Yard (m)	6.0	6.0	6.0	6.0	No change
Min. landscaped O.S. (%)	20	20	20	20	No change
Max. lot coverage (%)	48	48	48	53	No change
Max. height (m)	11.0	11.0	11.0	11.0	14m
Required Parking	2 per dwelling unit	2 per dwelling unit	2 per dwelling unit	2 per dwelling unit	No change
Min Setback for a private garage from front lot line (m)	6.0	6.0	6.0	N/A	No change
Minimum parking					1 space/unit (res.) + 0.25spaces/unit (vis)
Minimum Loading Space:					1 space

(1) Table 3C Additional Regulation (1) shall not apply

Amendments Requested to Zoning By-law Schedule



APPENDIX 3 – TRAILS PLAN

