

COPA1-25 – 514504 2nd Line, Amaranth

Comment #	City Comment	GEI Response	ACTION REQUIRED - INTERNAL USE ONLY
Dufferin County			
From: Corporate Services – Building Services			
	We have no comments or concerns at this stage in the application.	Noted.	
From: Corporate Services – Information Technology			
	<p>We request that all streets in the proposed subdivision be given unique names that do not duplicate or conflict with existing road names within Dufferin County, unless it is the continuation of an existing road. This includes names with similar spelling or pronunciation (ex. "Rogers" and "Rodgers", "Forrestview" and "Forestvue"). Road names cannot contain any punctuation or special characters such as apostrophes - ' or ampersands - &, etc.). Personal names should be highly discouraged for road names, including people of historical significance and current or former military personnel. In addition, parseable names with commonly used road name prefixes, suffixes or directions should not be used (ex. Courtney, Eastwood, Broadview).</p> <p>All addressing should be compliant with Bell Canada's 9-1-1 system and Next Generation (NG9-1-1) standards. In accordance with Bell Canada's 9-1-1 system, all addresses assigned to these streets should increase consecutively in the same direction by the same interval (2s or 4s) and consist of addressing parity of even numbers (i.e. 2,4,6,) on one side of the road and odd numbers (i.e. 1,3,5,) on the other side of the road.</p> <p>Both the proposed and final subdivision/site plans should be provided to Dufferin County. Proposed/approved road names should be clearly labeled on roadways and proposed/approved addresses should be clearly labeled on each lot on the plans which should be of sufficient quality and resolution.</p> <p>During construction, intersection signs and address numbers should be posted as soon as possible on each lot for emergency response purposes and to aid in the building inspection process during construction. Please note that emergency Services cannot be dispatched to Lot and Plan number in the case of a construction-related injury.</p>	Noted.	<p>W. E. Oughtred and Associates Inc</p>

From: Planning Division			
	<p>The County will request that an Agricultural Impact Assessment (AIA) be completed to determine the potential impacts of removing the subject lands from the prime agricultural designation.</p>	<p>An Agricultural Impact Assessment, dated October 2025, has been prepared by Colville Consulting Inc. The report is included in the second submission materials.</p>	<p>W. E. Oughtred and Associates Inc</p>
	<p><u>Planning Justification Report Comments</u></p>		
	<p>The amendment to the County of Dufferin Official Plan shall be from Prime Agricultural Area to Community Settlement Area. Please revise the PJR to reflect the correct redesignation.</p>	<p>The OPA request is now to revise the designation on Schedule B from Countryside Area to Community Settlement Area and revise the designation on Schedule C from Prime Agricultural Area to Community Settlement Area.</p>	<p>W. E. Oughtred and Associates Inc</p>
	<p>PPS, 2024 Section</p> <ul style="list-style-type: none"> • In section 4.2 of the PJR, which is dedicated to the Provincial Planning Statement, 2024 (herein referred to as PPS, 2024), discussion occurs on New Settlement Areas and Settlement Area Boundary Requests (section 2.3.2). What seems to be missing from this section is a discussion on the evaluation of alternative locations that avoid prime agricultural areas (section 2.3.2.1.d). As such, the County will request that such a discussion be included in that section of the PJR. • The section discussing section 2.6 (Rural Lands in Municipalities) of the PPS, 2024 should be removed. Rural lands are defined in the PPS, 2024 as "lands which are located outside settlement areas and which are outside prime agricultural areas". The subject lands are designated as prime agricultural and would, therefore, fall outside of that definition. • The PJR should include reference to and discussion on chapter three (infrastructure and facilities) of the PPS, 2024. 	<p>A discussion of alternative locations for a new settlement area in Amaranth Township has been added to Section 4.2 of the Planning Justification Report. Based on surveys prepared by Colville Consulting for the Agricultural Impact Assessment there are no alternative locations in Amaranth Township that avoid prime agricultural areas.</p> <p>The section discussing Section 2.6 of the PPS has been removed.</p> <p>The PJR now includes discussion of how the proposed infrastructure including water, sewer and stormwater meet the requirements set out in Chapter 3 of the PPS, 2004.</p>	<p>W. E. Oughtred and Associates Inc</p>

	<p>County of Dufferin Official Plan</p> <ul style="list-style-type: none"> ▪ In the section designated to Chapter Three of the Official Plan relating to Growth Objectives for the County (pg. 12), please provide further explanation on how the proposed development is compatible with the existing community (section 3.1.e). ▪ The PJR does not include discussion on the in-effect Prime Agricultural designation and associated policies. The PJR shall refer to the in-effect designation and its policies. ▪ Further exploration on alternative locations that avoid the prime agricultural area shall be included in the discussion on section 3.5.1.1(g). ▪ Explanation on how section 3.5.1.1(k) of the County Official Plan will be addressed shall be integrated into the PJR. ▪ Discussion should occur on other large-scale subdivision applications that have been approved in Amaranth and how this proposed development would integrate with those, specifically as it relates to achieving County Growth Projections. ▪ A review of the submitted EIS is being undertaken by a retained peer reviewer to ensure all findings align with the natural heritage policies of the County Official Plan. 	<p>The PJR now includes discussion of how the proposed development is compatible with the existing community (Section 3.1 e). The PJR now includes discussion of the in-effect Prime Agricultural designation and associated policies.</p> <p>Additional discussion regarding alternative locations that avoid prime agricultural areas (Section 3.5.1.1 (d) vi) is now included in the Report. Supply for land designated for Employment uses within the settlement area or in the vicinity (Section 3.5.1.1 (l)) is now discussed in the PJR.</p> <p>As per email correspondence between Liam Morgan, Senior Planner with the County of Dufferin and Rowan Faludi of urbanMetrics on August 14, 2025, the County will no longer require discussion on recently approved or expected subdivisions in Amaranth. Comments from the EIS peer reviewer have now been addressed in the revised EIS and a separate Comment Response Matrix has been prepared and submitted.</p>	<p>W. E. Oughtred and Associates Inc</p>
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	<p>Township of Amaranth Official Plan</p> <ul style="list-style-type: none"> • An extensive review of the proposed developments alignment with the Township Official Plan will be provided by the Township Planning consultant. • Further explanation on how the proposed development will align with section 4.2.3 (pg. 25) of the Township Official Plan is to be undertaken. • Please explain how the proposed subdivision design aligns with the design of neighboring developments, as per section 4.2.4.c(ii). 	<p>The PJR now includes additional discussion on how the proposed development aligns with Policy 4.2.3 in the Township Official Plan as well as how the development aligns with neighbouring development (Section 4.2.4. c(ii)).</p>	<p>W. E. Oughtred and Associates Inc</p>
	<p>The Planning Justification Report (PJR) shall be signed by a Registered Professional Planner (RPP).</p>	<p>The report has now been signed by a Registered Professional Planner.</p>	<p>W. E. Oughtred and Associates Inc</p>
	<p>Market and Socio-Economic Study</p> <p>o The County will request that a comparison between the proposed development and recently approved or expected subdivisions in Amaranth be implemented into this study. The comparison should specifically be focused on expected population growth for each subdivision.</p>	<p>As per email correspondence between Liam Morgan, Senior Planner with the County of Dufferin and Rowan Faludi of Urban Metrics on August 14, 2025, the County will no longer require this information to be included in the analysis.</p>	<p>Urbanmetrics</p>
	<p>Draft County Official Plan Amendment</p> <p>o Revise to reflect change from Prime Agricultural Area designation to Community Settlement Area, instead of Countryside Area.</p>	<p>The Draft County Official Plan Amendment has now been revised to request redesignation of the subject property from Prime Agricultural Area to Community Settlement Area on Schedule C.</p>	<p>W. E. Oughtred and Associates Inc</p>
	<p>All costs associated with County peer reviews shall be borne by the applicant. Payment of those costs can be completed upon completion of the peer reviews.</p>	<p>Noted.</p>	<p>GEI/Owner</p>
	<p>As part of any future submissions, the applicant shall prepare and submit a commenting matrix outlining how all comments from both internal departments and external agencies have been addressed.</p>	<p>Acknowledged.</p>	
<p>From: Public Works – Engineering Division</p>			
	<p>The County's Engineering division has reviewed the application and has no comments or concerns at this time.</p>	<p>Noted.</p>	
<p>From: Public Works – Waste Services</p>			
	<p>The standard criteria to receive waste collection are as follows:</p>		
1	<p>No backing up within the site by waste collection vehicles. A turn-around must be in place (hammerhead, or otherwise).</p>	<p>The Cul-de-sacs has been removed.</p>	<p>GEI</p>
2	<p>Turning radii of 5 meters.</p>	<p>Acknowledged.</p>	<p>GEI</p>

3	Minimum road width of 6m.	Acknowledged.	GEI
4	Access to collect on both side of the road.	Acknowledged.	GEI
5	For corner radii and turnaround dimensions, we default to that of the standards for Fire Services vehicles.	Acknowledged.	GEI
6	Review and abide by the Waste Collection Bylaw for all applicable information on the program. http://www.dufferincounty.ca/wp-content/uploads/2024/03/2012-36-Waste-Collection-Consolidated.pdf	Noted.	GEI/Owner
	If the development meets these criteria, Dufferin Waste will be able to provide the curbside collection of garbage, green bin, and yard waste.	Noted.	
Archaeological Assessment Peer Review			
	<p>The archaeological assessments undertaken within the Subject Property have adhered to the MCM's 2011 Standards and Guidelines for Consultant Archaeologists pursuant to the Ontario Heritage Act, R.S.O. 1990, c. O.18. as well as the requirement for Indigenous Engagement in accordance with the 2010 Technical Bulletin for Consultant Archaeologists in Ontario – Engaging Aboriginal Communities in Archaeology.</p> <p>The archaeological fieldwork and documentation provided by ACC are methodologically sound and adhere to all regulatory standards. ACC's conclusion that the property has been fully assessed and does not retain archaeological potential is justified. The report clearly demonstrates that all accessible and assessable lands have been appropriately evaluated.</p> <p>Based on the absence of archaeological materials, lack of intact soils, and previously documented assessments, I am in agreement that:</p> <ul style="list-style-type: none"> • The subject property no longer retains archaeological potential • No further archaeological assessment is required <p>Additionally, the MCM has also approved the assessment report and the reports has been entered into the Ontario Public Register of Archaeological Reports (see Appendix). Therefore, the Subject Property no longer retains archaeological potential or interest that would inhibit the proposed subdivision development.</p>	Noted.	Archaeological Consultants Canada (ACC)
Burnside - Environment Impact Study (EIS) Peer Review			
3	The EIS notes that discussions with NVCA remain ongoing due to the NVCA Violation Notice for Unauthorized Works associated with the vegetation removal within regulated area. This Violation Notice should be addressed prior to approval of the application as NVCA paused their review of the Terms of Reference due to the violation.	Please refer to NHS CRM.	GEI

4	<p>The vegetation community mapping prepared by Azimuth in 2018, which forms part of Appendix D, shows additional wetland communities that are not discussed in the current EIS or Appendix D report, namely the MAM2-10 meadow marsh in the central portion of the property. Furthermore, in 2018, NVCA identified a wetland and staked its boundaries in the northeastern corner of the property. The current EIS states that this area is not a wetland. The application should not proceed until NVCA confirms whether their original assessment was inaccurate or if they are satisfied that there is no longer a wetland in the northeast corner of the property.</p>	Please refer to NHS CRM.	GEI
5	<p>We understand that GRCA is aware of wetland removal within their jurisdiction's Regulated Area. Please confirm if an additional violation order is pending or if any requirements have been outlined by GRCA.</p>	Please refer to NHS CRM.	GEI
6	<p>In addition to the recent wetland removal, it appears as though trails have been also recently constructed along the wetland, and woodland edges. We understand that these trails will be restored to a natural condition. A detailed restoration plan is required.</p>	Please refer to NHS CRM.	GEI
7	<p>All lot boundaries, grading and roads should be kept outside of all natural feature setbacks. Lot boundaries should be adjusted to remain outside of setbacks. A grading plan should be provided to demonstrate that no grading will occur within natural feature setbacks.</p>	Please refer to NHS CRM.	GEI
8	<p>To aid in review of Figure 12: Potential Restoration and Enhancement Areas, please provide mapping to depict all currently and previously existing wetlands, woodlands and their associated setbacks. Identify which features and which setbacks have been disturbed or removed. Detailed restoration plans must be provided for all natural features and associated setbacks where removal or disturbance has occurred. We understand that wetland removals in the NVCA are being addressed through a violation order. We note that NVCA's current mandate addresses the hydrologic function of wetlands only, while the municipality is responsible for the ecological function of wetlands. As such, any restoration plans prepared as part of the violation should also be reviewed and approved by the County.</p>	Please refer to NHS CRM.	GEI
9	<p>Please clarify how Lot 6 will be accessed. Is Block 29 proposed to be a municipal road? It is unclear why the road ends at the property boundary. Will a cul-de-sac be constructed here? Please confirm if additional disturbance will occur within the wetland setback if a cul-de-sac is required.</p>	Please refer to NHS CRM.	GEI
10	<p>Significant grading is proposed across the site. There is potential for hydrologic changes which could impact wetlands. The EIS notes that a wetland water balance risk evaluation, using TRCA's 2017 guidelines, will be carried out. The water balance and risk analysis should be submitted and reviewed prior to approval of the application.</p>	Please refer to NHS CRM.	GEI
Canada Post			
	<p>The owner/developer will consult with Canada Post to determine suitable permanent locations for the placement of Community Mailboxes and to indicate these locations on appropriate servicing plans.</p>	Noted.	Owner/GEI

	The Builder/Owner/Developer will confirm to Canada Post that the final secured permanent locations for the Community Mailboxes will not be in conflict with any other utility; including hydro transformers, bell pedestals, cable pedestals, flush to grade communication vaults, landscaping enhancements (tree planting) and bus pads.	Noted.	Owner/GEI
	The owner/developer will install concrete pads at each of the Community Mailbox locations as well as any required walkways across the boulevard and any required curb depressions for wheelchair access as per Canada Post's concrete pad specification drawings.	Noted.	Owner/GEI
	The owner/developer will agree to prepare and maintain an area of compacted gravel to Canada Post's specifications to serve as a temporary Community Mailbox location. This location will be in a safe area away from construction activity in order that Community Mailboxes may be installed to service addresses that have occupied prior to the pouring of the permanent mailbox pads. This area will be required to be prepared a minimum of 30 days prior to the date of first occupancy.	Noted.	Owner/GEI
	The owner/developer will communicate to Canada Post the excavation date for the first foundation (or first phase) as well as the expected date of first occupancy.	Noted.	Owner/GEI
	The owner/developer agrees, prior to offering any of the residential units for sale, to place a "Display Map" on the wall of the sales office in a place readily available to the public which indicates the location of all Canada Post Community Mailbox site locations, as approved by Canada Post and the Town of Oakville.	Noted.	Owner
	The owner/developer agrees to include in all offers of purchase and sale a statement, which advises the prospective new home purchaser that mail delivery will be from a designated Community Mailbox, and to include the exact locations (list of lot #s) of each of these Community Mailbox locations; and further, advise any affected homeowners of any established easements granted to Canada Post.	Noted.	Owner
	The owner/developer will be responsible for officially notifying the purchasers of the exact Community Mailbox locations prior to the closing of any home sales with specific clauses in the Purchase offer, on which the homeowners do a sign off.	Noted.	Owner
	Canada Post further requests the owner/developer be notified of the following:	Noted.	Owner/GEI
1	The owner/developer of any condominiums will be required to provide signature for a License to Occupy Land agreement and provide winter snow clearance at the Community Mailbox locations	Noted.	Owner
2	Enhanced Community Mailbox Sites with roof structures will require additional documentation as per Canada Post Policy	Noted.	Owner/GEI
3	There will be no more than one mail delivery point to each unique address assigned by the Municipality	Noted.	Owner

4	Any existing postal coding may not apply, the owner/developer should contact Canada Post to verify postal codes for the project	Noted.	Owner/GEI
5	The complete guide to Canada Post's Delivery Standards can be found at: https://www.canadapost.ca/cpo/mc/assets/pdf/business/standardsmanual_en.pdf	Noted.	Owner/GEI
Enbridge Gas			
	Enbridge Gas does not object to the proposed application(s) however, we reserve the right to amend or remove development conditions. This response does not signify an approval for the site/development.	Noted.	
Mississaugas of the Credit First Nation			
	<p>The Mississaugas of the Credit First Nation (MCFN) are the Rights Holders of the land on which the project will take. The MCFN holds Indigenous and Treaty Rights specific to the project location and its environs, which may be adversely impacted by it. The Department of Consultation and Accommodation (DOCA) is designated by the MCFN to handle consultation matters on its behalf.</p> <p>The DOCA consultation team has filed the project-related correspondence identified above. We have no questions or comments for you at this time. This does not indicate a position of support for the project, that the Duty to Consult and Accommodate the MCFN has been met, or that there are no adverse impacts to the MCFN's Indigenous and Treaty Rights.</p> <p>DOCA expects to be notified of any and all future project updates and/or changes. Additionally, DOCA must be notified of, invited to participate in, and provided the opportunity to review any environmental and/or archaeological assessments. At its discretion, DOCA may request capacity funding from the proponent for its consultation and engagement activities relating to the project.</p>	Noted.	
Shelburne and District Fire Department			
	SDFD has no comments or concerns re County Official Plan Amendment-COPA 1-25 - 514504 2nd Line, Amaranth.	Noted.	
Six Nations of the Grand River			

	<p>We typically go back and forth with proponents to better understand a project, and then negotiate measures to mitigate impacts to Aboriginal and treaty rights where avoidance isn't possible. But we still don't fully understand the impacts to those rights. FYI, we always seek environmental enhancements which go beyond regulatory requirements. Current legislation doesn't adequately account for the needs or impacts to wildlife when assigning buffer lengths, nor does it seek to improve natural resiliency. The best management practices allow for buffer of 61 meters to shield wildlife from human impacts and buffers for all wetlands must be at least 31 metres.</p>	<p>Noted</p>	<p>W. E. Oughtred and Associates Inc</p>
	<p>There is nothing in the response to indicate that the accuracy of some field studies weren't compromised by the ongoing construction. We believe those studies should be redone, or alternatively, that mitigation should assume a higher presence of wildlife.</p>	<p>Noted.</p>	<p>W. E. Oughtred and Associates Inc</p>
	<p>None of my questions about the wetlands were answered. I need a much better overall picture, and rationalization, of past and planned wetland removals.</p>	<p>The EIS now includes information about past wetland removals and details of discussions with the NVCA on proposed restoration and enhancement.</p>	<p>W. E. Oughtred and Associates Inc</p>
	<p>Please send me the arborist report.</p>	<p>The revised Arborist Report is included with this submission.</p>	<p>Owner</p>
	<p>I'd like clarification about the following: "Additionally, the residential lots extend to the edge of the retained wetlands within the Subject Lands. However, GEI recommends that all future residential building envelopes within the proposed lots, including above- and below-ground infrastructure, be located entirely outside the recommended wetland setbacks." Does this mean the current draft plan is not being altered and GEI's recommendation is only for future phases? Please justify the wetland encroachments within your planned buffers.</p>	<p>Building envelopes including above- and below-ground infrastructure, will not encroach within the wetland, or wetland buffer. A 30m buffer to the proposed residential lots is maintained throughout the proposed development.</p>	<p>GEI</p>

	<p>I have serious concerns about the accuracy of the report, previous natural environmental removals, and the proponent's plan for the property.</p> <p>The EIS is irreparably flawed. The report says "At the time of the ecological field surveys, the Subject Lands were undergoing active construction and land management". Such activities would have prevented the consultants from obtaining an accurate baseline because it's common for wildlife to be displaced under such circumstances.</p> <p>Please provide more context for the wetland removals. Who was destroying the vegetation? Why were they doing that?</p> <p>The report says there's no suitable breeding habitat for Meadowlark or Bobolink, but fieldwork from other EIS studies have found probable breeding habitat on properties with similar profiles.</p> <p>The report notes Monarch habitat will be "considered as part of ecological enhancement for the Subject Lands." Is such information contained in a separate report?</p> <p>Is it known how many trees will be removed?</p> <p>There doesn't appear to be any bat studies. The report acknowledges a likelihood for SAR bats to be found.</p> <p>Please tell us more about the muskrat and deer.</p> <p>This area is clearly an Amphibian Movement Corridor regardless of whether it has been identified by MNR or the municipality.</p>	<p>EIS has been amended.</p>	<p>GEI</p>
	<p>The setbacks/buffers are insufficient and made worse with the minor encroachments. It's simply unacceptable for the lots to go to the edge of the wetlands.</p>	<p>The subdivision plan has been amended to include 30m buffer between the Provincially Significant Wetlands/Wetlands and lot lines. Lots no longer encroach into the buffer.</p>	<p>GEI</p>
<p>Township of Amaranth (Council, Engineer, Planner)</p>			
	<p>Planning Justification Report</p>		
	<p>This proposal is more typical of an Estate Residential development in Amaranth as opposed to a Settlement Area. Developments in the Waldemar Settlement Area have been developed with a communal water system providing fire hydrants, community parks, and connectivity between neighborhoods. A curbed road section with sidewalks may be required in a community Settlement Area.</p>	<p>The local Official Plan Amendment requests redesignation from Rural Area to Estate Residential because all lots will be serviced by individual, private water and sanitary services. Further, constructing the proposed subdivision to the Community Residential development standards with sidewalks, curb and gutter is not feasible for a 19 lot development that will be built out over a number of years.</p>	<p>W. E. Oughtred and Associates Inc</p>
	<p>The Township has previously expressed its interest in developing the Waldemar community with local amenities to service the residential community. For example a community centre has been suggested as a means to provide a common interest for the community. There may be similar interest in this proposed community.</p>	<p>Noted.</p>	<p>W. E. Oughtred and Associates Inc</p>

	<p>It is unusual to provide a road stub that leads to the boundary of a Settlement Area.</p>	<p>The road stub has now been removed from the plan</p>	<p>W. E. Oughtred and Associates Inc</p>
	<p>The Planning Justification Report makes many broad rationalizations for this Settlement Area that would equally apply to almost any farm in Amaranth. For example;</p> <p>“The area is served by a network of local roads, making it accessible by car”</p> <p>“The proposed development represents orderly development as it makes efficient use of land in a rural location with easy access to nearby urban areas”</p> <p>“The subject site is located approximately halfway between the towns of Shelburne and Orangeville..... Residents of the proposed subdivision will have access to shopping, restaurants, entertainment, local services and amenities within a short driving distance.”</p> <p>Justification should be provided to explain why this particular site should be chosen for a settlement area over other properties in the Township. Likewise, the growth numbers should rationalize the proposed boundaries of the new Settlement Area.</p>	<p>The Agricultural Impact Assessment surveys alternative locations in the Township of Amaranth and found that there are no alternative locations for a settlement area that avoid Prime Agricultural Areas. The AIA also found that there are no lower priority agricultural lands within 1.5 km of the subject lands and concludes that the site is a reasonable location for the proposal. The 18 lots that will be created represent 8% of the lots required outside existing community settlement areas to meet projected population growth to 2051.</p>	<p>W. E. Oughtred and Associates Inc</p>
	<p>The reference in Section 6.3 to permanent dewatering is concerning.</p>	<p>The grades have all been raised and all house basements are to be above the water table. Permanent dewatering will no longer be required.</p>	<p>W. E. Oughtred and Associates Inc</p>
	<p>Draft Plan of Subdivision-</p>		
	<p>A preliminary grading plan should be provided to rationalize the subdivision layout.</p>	<p>A preliminary grading plan has been completed and accompanied the application. Please refer to Conceptual Grading Plan (SG-01-06, dated November 2025 by GEI)</p>	<p>GEI</p>
	<p>The Township has previously expressed distain for culs-de-sacs and has required a looped road layout. This is noted in Section 3.9.6 (a)(ii) of the Official Plan.</p>	<p>The subdivision plan has been amended to remove proposed cul-de-sacs and proposed a looped road.</p>	<p>GEI</p>
	<p>Minimum centerline of road radius is typically 65m</p>	<p>A Minimum centerline road radius of 65m is achieved except at the entrance to existing lot 15.</p>	<p>GEI</p>
	<p>Lot 6 has no frontage on a public road and should not be developed.</p>	<p>Lot 6 location was located at the far south west corner and has been removed.</p>	<p>GEI</p>
	<p>The future road stub crosses the Nature trail at an oblique angle. This sort of configuration causes safety concerns and should be resolved prior to establishing the layout. It would be more reasonable to extend the nature trail from the rear lot line of Lot 5 and abandon Lot 6.</p>	<p>The block 29 has been removed.</p>	<p>GEI</p>

	<p>More details need to be fleshed out for the Emergency Access. It is being proposed for emergency purposes which may imply that it needs to be available 24/7 and requires snow removal on a continual basis. Developments with a single point of access are not typically encouraged.</p>	<p>The road layout has now been revised. There will be a single road, built to municipal standards, providing access to all lots in the subdivision. The road will have 2 points of intersection with 2nd Line, thereby providing adequate emergency access to all lots.</p>	<p>Nexttrans</p>
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	Municipal Emergency Numbering will be confused with Lot 24 having frontage on Road B but a driveway entrance on 2nd Line; the driveway may need to be connect directly to the new road. Municipal numbering would also be a concern with Lot 6, if it is not eliminated, because it would logically be numbered from the future road on Block 29.	Proposed lot numbers are sequential.	GEI
	Hydrogeological Investigation		
	We don't understand the reference to the Dufferin County Sewer Use By-law	Reference changed to New Tecumseth Sewer Use By-law.	Canada Engineering Services Inc.
	Reference to the Ontario Regulation 347/04 appears to be an error.	Changed to 387/04.	Canada Engineering Services Inc.
	Compliance with MOE D-Series Guidelines is the typical requirement for rural developments and should be referenced and followed. Nitrate analysis is required per D-5-4 and water supply needs to follow D5-5.	To be addressed by the sewer designer when building permit applications are submitted for each proposed residence.	Canada Engineering Services Inc.
	Section 1.2 suggests that houses will be set at the elevation of existing grades, while typically in Amaranth it is preferred that have lot grading designed to avoid future problems that follow practices such as keeping the houses higher than the road.	Grades of the houses and roads have all been raised. See revised Grading Plan prepared by GEI dated November 2025.	Canada Engineering Services Inc.
	The soils investigation should lead to a recommendation for the required depth of road base. This is important to understand how deep the ditches will need to be which impacts on the aesthetics of the site and future ditch maintenance.	Grades of the houses and roads have all been raised.	Canada Engineering Services Inc.
	Water quality was not addressed. Nearby developments have been affected by water quality issues pertaining to arsenic.	Since the grades have all been raised, this should no longer be a concern as dewatering is no longer required.	Canada Engineering Services Inc.
	We have concerns with Section 5.1 that states "Alternatively, if de-watering is not carried out on a permanent basis, the house basements will have to be built as a bath tub, with basement walls and garage floors water proofed and design (sic) to resist the highest hydrostatic pressures they will be subjected to". In our opinion this will be difficult to implement and oversee with possible repercussions for the municipality. In a nearby development the developer was required to use fill in order to elevate the basements above the water table. All of this may impact on the conceptual grading plan that was part of the submission.	The grades have all been raised and all house basements are to be above the water table. Permanent dewatering will no longer be required.	Canada Engineering Services Inc.
	Conceptual Grading and Servicing Plans		
	Approval will be required from the Township's drainage engineer for any impacts on the Municipal Drain	Noted.	GEI
	In the event that curbs and sidewalks are not required, rural sections require shoulder width of 1.2m Ditch side slopes are considered unmaintainable at 2.5:1 as proposed. The steepest permissible side slope is 3:1	Ditch sideslopes are revised to 3:1.	GEI/Nextrans

	House envelopes, septic beds, reserve beds, and driveways need to be shown	Driveways have been shown. House envelopes, septic beds, and reserve beds will be shown at detail design stage or future applications.	GEI
	The grading plan needs to consider the relationship between houses and the road, as well as adjacent lots and features. Typically there is a desire for houses to be set higher than the road and grading plans are prepared to avoid the severe terraces that can result between lots when grading is done on a house-by-house basis.	Grading plans have been amended to consider the relationship between the roads and lots.	GEI
	The Township has concerns with maintenance obligations for infiltration trenches in roadside ditches.	Operations and maintenance manual can be provided at the request of the Township.	GEI
	Traffic Impact Study		
	We have no reason to question the conclusion that the adjacent roadways are operating below their capacity and that they can accommodate an additional 24 lots	Noted.	Nextrans
	The Study proposes to grant the Township an easement over the existing residential driveway onto 2nd Line for emergency access to the subdivision, but notes that the driveway will not be upgraded to public road standards. This arrangement will require much discussion on matters such as what constitutes an emergency, what terms are required for availability, and what responsibilities the Township will have if public use causes damage that would not occur on a residential driveway.	The road configuration has now been revised. A single road, built to municipal standards, will provide access to all lots. The road will have 2 accesses from 2nd Line, one toward the northerly extent of the property and the second toward the south lot line.	Nextrans
	The Traffic Impact Study should comment on the site visibility of the proposed intersection and emergency access from 2nd Line	The TIS now includes an opinion that the location of the proposed accesses from 2nd Line are acceptable given the road context of 2nd Line, assumed existing low traffic volumes and lot site trip generation from the proposed development.	Nextrans
	The Traffic Impact Study should discuss the implications of servicing this development with a single point of access, both in emergency and normal conditions	The plan has been revised to provide 2 accesses from 2nd Line.	Nextrans
	The Traffic Impact Study makes no mention of the existing road network being paved or gravel. In fact, 2nd Line is an unpaved road. Development of a subdivision on an unpaved road may lead to demands on the Township to provide upgrades. The developer may be asked to upgrade 2nd Line to a paved section connecting to other paved roads.	Noted.	Nextrans
	Functional Servicing and SWM Report		
	As noted previously, commentary on water and wastewater servicing should be based on the D-Series guidelines.	Future water and wastewater servicing to be based on D-Series guidelines.	GEI

	<p>The stormwater management system is based on setting driveway culverts at an elevation that is higher than the roadside ditch, which would allow the ditch water to pond in order to promote infiltration and to mitigate peak runoff increases. This approach is not acceptable to the Township for a number of reasons:</p> <p>Developments within Settlement Areas are typically built with curbed roads having no ditches.</p> <p>On roads that are constructed with ditches it is important to keep ditch bottoms at least 150mm lower than the bottom of the granular road base. This minimizes the potential of ditch water penetrating the road base and causing frost damage. The proposal to have driveway culverts higher than the bottom of ditches may interfere with drainage of the granular road base.</p> <p>Stormwater management facilities typically are allowed to drain between storms, while this proposal could potentially receive storm flows when the storage areas are already full</p> <p>In areas that have been developed with open ditches it is common for the Township to receive complaints about water ponding in ditches which makes it difficult for homeowners to cut the grass</p> <p>The Township will have concerns with the maintenance obligations for the infiltration media</p>	<p>The proposed stormwater management system is aligned with low impact development, specifically for rural areas. The area in proximity to the development is a rural setting, without curb and gutter to match into. 2nd Line is a gravel road, while 20 Sideroad is paved while utilizing roadside ditches. The proposal maintains continuity with the surrounding area.</p>	<p>GEI</p>
	<p>Further discussion is required for the proposed dry pond. What are the maintenance requirements? How is it accessed by the Township for maintenance? Will the Township be provided access over the privately owned nature trail? If so, will the nature trail be designed to carry the weight of maintenance equipment? What obligations will arise from the Township's Consolidated Linear Infrastructure ECA?</p>	<p>Comprehensive dry pond maintenance requirements will be added in the details drawings. These requirements include but are not limited to:</p> <ul style="list-style-type: none"> - Dry ponds should be inspected for clogging and excessive accumulation at least annually, or as needed. - Mowing/trimming of vegetation should be performed on a regular schedule based on specific site conditions; perimeter grass should be mowed at least once a month during growing season. - Repair and revegetate eroded areas in the basin and channels. - Remove sediment. - Inspect after every major storm event. <p>5.0m width Access roads will be provided for each dry pond at detail design stage.</p>	<p>GEI</p>
<p>From Township of Amaranth</p>			

	Planning Justification Report		
1	The subject lands are designated 'Countryside Area' on Schedule B and 'Prime Agricultural Area' as per Schedule C of the County of Dufferin Official Plan. The lands are also designated 'Woodlands' and 'Provincial Plan Area' on Schedule E and 'Preliminary Natural Heritage System' on Schedule E1 of the Dufferin Official Plan.	Acknowledged.	W. E. Oughtred and Associates Inc
2	County Official Plan Amendment #2 was adopted by By-law 2023-25 that revised Table 3.2a) in the Official Plan to amend the growth forecast within Dufferin County to 2051. Accordingly, the Township of Amaranth is expected to grow by 3,800 people to 2051. The majority of growth is to be directed to the County's settlement areas. These built-up areas provide a mix of land uses and preserve the agricultural area and conserve the natural heritage features and areas. The Community Settlement Areas in the Township of Amaranth include Laurel, Waldemar and Farmington.	Acknowledged.	W. E. Oughtred and Associates Inc
3	The PJR suggests that the Township of Amaranth does not have adequate residential land designated in the Official Plan to accommodate the project growth and the proposed development will provide additional dwelling units to meet the growth targets. The applicant should re-evaluate if they have considered all approved draft plan of subdivisions in the Township of Amaranth and the existing building lot availability in their analysis and justification. As part of the County's Official Plan update, a Lands Needs Assessment was prepared to identify the residential land supply in the County. The Lands Needs Assessment prepared as part of the County of Dufferin Official Plan update concluded that the Township of Amaranth has sufficient lands available to accommodate future population and employment growth allocated to the Township. There was no justified need to expand any settlement boundaries, or create a new settlement area.	As per email correspondence between Valerie Schmitde of GSP Planning and Rowan Faludi of urbanMetrics on August 14, 2025, the requirement to consider all approved draft plans of subdivision and existing building lot availability in the anyalysis has been retracted. Further, urbanMetrics reviewed the Draft Land Needs Assessment prepared in 2022 and notes that the growth projections used in that Assessment have now been revised upwards through OPA 2 to the County Official Plan and forecasting prepared by the Ministry of Finance in 2024. As such, urbanMetrics is of the opinon that the 2022 Draft Land Needs Assessment is underestimating the need for additional lands to accommodate growth in Dufferin County.	W. E. Oughtred and Associates Inc
4	The Township of Amaranth is currently undertaking a Land Evaluation and Area Review (LEAR) Study. A LEAR is a technical evaluation system developed by the Ontario Ministry of Agriculture, Food, and Rural Affairs (OMAFRA) to identify prime agricultural lands for long-term production. The results of the LEAR are intended to inform Township input in any future County level review of the agricultural land base. Preliminary mapping from the LEAR Study identifies the subject property as Preliminary Prime Agriculture.	Noted.	W. E. Oughtred and Associates Inc

<p>5</p>	<p>Section 2.3.2 of the PPS states when identifying a new settlement area, planning authorities shall consider the following:</p> <ul style="list-style-type: none"> a) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses; b) if there is sufficient capacity in existing or planned infrastructure and public service facilities; c) whether the applicable lands comprise specialty crop areas; d) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas; e) whether the new or expanded settlement area complies with the minimum distance separation formulae; f) whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and g) the new or expanded settlement area provides for the phased progression of urban development. 		<p>W. E. Oughtred and Associates Inc</p>
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	<p>The PJR has not provided adequate justification that there is a need for a new settlement area as per policy 2.3.2 of the Provincial Planning Policy 2024. As per comment #2, the analysis did not consider the available residential land supply identified as part of the Land Needs Assessment prepared for the County of Dufferin Official Plan update. The PJR did not evaluate alternative locations which avoid prime agricultural areas, and where avoidance is not possible, consider reasonable alternatives on lower priority agricultural in prime agricultural areas. As per the Ministry of Agriculture, Food and Agribusiness mapping, the majority of the subject property is classified as Class 1 and 2 soils, which have no significant limitation or moderate limitations on use for crops. As per policy 2.3.2.1 f) of the PPS, an Agricultural Impact Assessment will need to be submitted to determine any impact on the agricultural system. The PJR also has not adequately demonstrated how the new settlement area will be planned for a phased progression of development.</p>	<p>The Draft Land Needs Assessment estimates that the Township will require 1,140 new dwelling units between 2021 and 2051 to accommodate projected population growth. 216 of those dwelling units will be outside of existing settlement areas. The proposal will establish a new settlement area that will provide 18 vacant lots or 8% of the total required outside of existing settlement areas. The property owner anticipates selling about 5 lots per year. As such, full build out of the subdivision will take 4 to 5 years. A discussion of alternative locations for new development which avoid prime agricultural areas is now included in the PJR based on findings of the Agricultural Impact Assessment.</p>	<p>W. E. Oughtred and Associates Inc</p>
6	<p>As per policy 2.6.4 of the PPS, an Agricultural Impact Assessment is required to review any impacts to surrounding agricultural and other resource-related uses.</p>	<p>An Agricultural Impact Assessment, dated October 2025, has been prepared by Colville Consulting Inc. The report is included in the second submission materials.</p>	<p>W. E. Oughtred and Associates Inc</p>
7	<p>The PPS defines prime agricultural areas as specialty crop areas and/or Canada Land Inventory Class 1, 2, and 3 lands in this order of priority for protection. According to the Canada Land Inventory, most of the subject land is classified with Class 1 and 2 soils. Policy 4.3.1.2 of the PPS states prime agricultural areas shall be designated and protected for long-term use for agricultural.</p>	<p>The Agricultural Impact Assessment has determined that the subject property is composed of CLI Class 1 lands (57.63% of the property), Class 2 lands (31.03%) with small areas of Class 3 and 4. However, the AIA also notes that the subject property is fragmented by natural features which reduce the land's capacity for intensive agriculture.</p>	<p>W. E. Oughtred and Associates Inc</p>
8	<p>The PPS defines settlement areas as urban areas and rural settlement areas within municipalities (such as cities, towns, villages and hamlets). Ontario's settlement areas vary significantly in terms of size, density, population, economic activity, diversity and intensity of land uses, service levels, and types of infrastructure available.</p> <p>Settlement areas are: a) built-up areas where development is concentrated and which have a mix of land uses; and b) lands which have been designated in an official plan for development over the long term.</p> <p>The PJR should provide further justification on how this proposed development functions as a Settlement Area as defined in the PPS (policy 2.3.1) and in the County of Dufferin Official Plan (policy 3.3.1 and 3.3.3). Rural settlement areas include small villages or hamlets.</p>	<p>The PJR now includes discussion of how the proposed development functions as a Settlement Area as per PPS policy 2.3.1 and County of Dufferin policy 3.3.1 and 3.3.3.</p>	<p>W. E. Oughtred and Associates Inc</p>
9	<p>The applicant is requesting that the subject property be designated from 'Rural' to 'Estate Residential' and 'Environmental Protection' in the Township of Amaranth Official Plan. Please note that an Estate Residential designation is intended to recognize existing estate residential lots in plans of subdivision and areas designated Estate Residential prior to June 16, 2006.</p>	<p>Noted.</p>	<p>W. E. Oughtred and Associates Inc</p>

10	<p>The appropriate land use designation for the proposed development would be 'Community Residential' and 'Environmental Protection' in the Township Official Plan given the proposed County Official Plan Amendment designation to a 'Community Settlement Area'. Similar, the appropriate zoning would be Hamlet Residential (HR) and Environmental Protection (EP).</p>	<p>As per Section 3.4.5 (e) development standards in the Community designation shall include asphalt roadways, sidewalks, streetlighting, curbs and gutters and boulevard landscape treatment. Providing sidewalks, curbs and gutters is not financially feasible for a small development. As such, the requested amendment to the Official Plan will remain redesignation to Estate Residential as there are no such development standards for this land use designation. The Zoning By-law Amendment will continue to request rezoning to Estate Residential in concert with the proposed land use designation.</p>	<p>W. E. Oughtred and Associates Inc</p>
11	<p>The Planning Justification Report should be signed and stamped by a Registered Professional Planner.</p>	<p>The report has now been signed by a Registered Professional Planner.</p>	<p>W. E. Oughtred and Associates Inc</p>