

**Public Works Growth Management and Planning Division**

1815 Sir Isaac Brock Way, Thorold, ON L2V 4T7  
905-980-6000 Toll-free: 1-800-263-7215

---

**Via Email Only**

October 31, 2024

Regional File Number: PLSD202401087

Susan Smyth  
Senior Planner  
Township of West Lincoln  
318 Canborough St., P.O. Box 400  
Smithville, ON  
L0R 2A0

Dear Ms. Smyth:

**Re: Preliminary Regional and Provincial Comments  
Block Plan; Draft Plan of Subdivision; Zoning By-law Amendment  
Township File Number: 4000-001-24  
Applicant: Arcadis  
Owners: Lockbridge Development Inc.; Judy Hendler; TEK Corporation  
Location: Smithville Block Plan Area 9 – Stage 3A**

---

Staff of the Regional Public Works Growth Management and Planning Division reviewed the information circulated with the applications for Zoning By-law Amendment (“ZBA”), Draft Plan of Subdivision (“DPS”), and Block Plan for the lands municipally known as Roll No. 260202000923300, 260202000923400, and 260202000923500.

**Smithville Block Plan Area 9**

Block Plan Area 9 consists of approximately 61.07 hectares (150.91 acres) of land within the Southeast Smithville Secondary Plan Area recently added to the Smithville Urban Area through approval of the Niagara Official Plan, 2022. The lands are generally situated south of Townline Road, east of Port Davidson Road, and west of the Regional Smithville Sewage Lagoons.

The proposed ‘Preferred Land Use Concept’ plan, prepared by Arcadis and dated July 11, 2024, sets out a mix of low and medium density residential uses as well as a commercial/mixed-use node, parklands/open spaces, trails, and stormwater management facilities to support the development of these lands. The proposed land use concept also identifies a road network, a future active transportation network/trails,

and a natural feature/buffer area adjacent to the proposed trail central to the block area. The concept plan also recognizes the proximity of the lands to the Smithville Sewage Lagoons and identifies a 150 metre buffer area along the easterly limits of Block 9.

### **Draft Plan of Subdivision and Zoning By-law Amendment**

The Draft Plan of Subdivision, prepared by Arcadis (dated August 13, 2024), consists of a 12.512 hectare section of Block 9 situated south of Townline Road and west of Shurie Road. The Draft Plan proposes the following land uses:

- 154 lots for single detached dwellings;
- six (6) lots for 12 semi detached dwellings;
- one (1) block for 30 townhouse dwellings;
- three (3) blocks for stormwater management;
- five (5) gas easement blocks;
- two (2) blocks for open space/trail;
- one (1) block for open space access;
- one (1) block for road widening;
- public roadways; and
- five (5) blocks for future road connections.

The subject lands are currently zoned 'Agricultural' (A) zone, 'Residential Low Density – Type 1C – Site-Specific Provision 33' (R1C-33) zone, 'Agricultural Purposes Only' (APO) zone, and 'Development' (D) zone in the Township's Zoning By-law. The Zoning By-law Amendment requests to rezone the lands to implement the land use schedule and lot areas proposed by the draft plan of subdivision with 'Residential Low Density (R3)' zone, 'Residential Medium Density' (RM3) zone, and 'Open Space' (OS) zone. Additionally, the applicant is requesting a decrease in the minimum lot area for the shallow middle lots that front onto the gas easement / trail.

Two pre-consultation meetings for this proposal, attended by Township and Regional staff, the proponents, and their consultants, were held on February 1, 2024, and June 6, 2024, with a subsequent meeting held on September 19, 2024.

It is Regional staff's understanding that the Township has not deemed the applications complete as of the date of this letter. The following preliminary Provincial and Regional comments are provided to assist the Township in considering these applications as currently proposed.

**As discussed below, Regional staff is unable to confirm at this time whether the proposed Zoning By-law Amendment and Draft Plan of Subdivision applications are consistent with and conform to the Provincial Planning Statement and Niagara Official Plan as the required Environmental Impact Study, as requested during pre-consultation, has not been provided with the submission.**

## **Provincial and Regional Policies**

The subject lands are located within a Settlement Area under the *Provincial Planning Statement, 2024* (PPS) and within a Settlement Area and Designated Greenfield Area under the *Niagara Official Plan, 2022* (NOP).

The PPS directs growth to Settlement Areas, which are the focus of growth and development, and encourages land use patterns based on densities and a mix of land uses that efficiently use land and resources, optimize existing and planned infrastructure and public service facilities, and support active transportation. The PPS further encourages planning authorities to establish density targets for designated growth areas, based on local conditions .

The NOP directs that development in Designated Greenfield Areas be planned as complete communities, ensuring development is sequential, orderly and contiguous with the existing built-up area, infrastructure capacity is available, and that it supports active transportation. To support the achievement of forecasted growth for all Designated Greenfield Areas within Niagara Region as a whole, the NOP directs that local Official Plans include direction which achieves a minimum greenfield density target of 50 residents and jobs combined per hectare on a municipal-wide basis.

The “Development Report” prepared by Arcadis Professional Services (Canada) Inc (dated August 23, 2024) for the Block Plan, DPS and ZBA applications indicates that the provision of new housing units and commercial area will contribute to a minimum density target of 50 combined people and jobs per hectare as set out in the Smithville Master Community Plan (“MCP”; Official Plan Amendment 63).

The Draft Plan of Subdivision, which proposes 196 residential units on 12.51 hectares of developable area (which excludes the watercourse block), will yield a density of approximately 45 people and jobs per hectare, based on approximately 3 persons per single-detached unit, 2.6 persons per semi detached units, and 2.2 persons per townhouse unit, and assuming 5% of the residential units would generate “at home” employment. This is under the minimum density target of 50 people and jobs per hectare for Designated Greenfield Areas in the NOP and the MCP.

The Township is responsible for monitoring developments to ensure the overall Greenfield density target will be achieved on a municipal-wide basis and should be satisfied that the proposal conforms to and contributes towards fulfilling the greenfield density target in the Township’s Official Plan.

## **Archaeological Potential**

The PPS and NOP state that development and site alteration is not permitted within areas of archaeological potential unless significant archaeological resources have been

conserved. The subject lands are within an area of archaeological potential mapped on Schedule K of the NOP.

Regional staff reviewed the Stage 1 & 2 Archaeological Assessments conducted by Parslow Heritage Consultancy Inc. (dated July 21, 2020) and received the associated Ministry of Citizenship and Multiculturalism (MCM) Acknowledgement letters (dated June 24, 2022, respectively). The Stage 2 Archaeological Assessment identified three archaeological sites and recommended that a Stage 3 Site Specific Assessment be conducted of two of the sites (indigenous sites AgGv-146 and AgGv-147).

The Stage 3 Archaeological Assessment, and any further assessments, if required, is to be submitted to the MCM prior to any development or site disturbance on the subject lands. NOP policy 7.11.1.5 requires that archaeological assessments that identify sites and archaeological resources of Indigenous interest be provided to the community of closest affiliation to the site and/or resources. Proponents are to engage First Nations and Indigenous communities at the earliest opportunity and consider their interests when identifying, protecting, and managing cultural heritage resources and archaeological resources. First Nations and Indigenous communities are to be engaged through the Stage 3 Assessment work in accordance with the *Standards and Guidelines for Consulting Archaeologists*.

Regional staff will require a copy of the Stage 3 (and any further) report(s) and MCM acknowledgement letter(s) confirming that the licensed consultant archaeologist has met the terms and conditions of their license and that the archaeological fieldwork and report recommendations are consistent with the conservation, protection and preservation of the cultural heritage of Ontario.

Regional staff note that, in accordance with Section 48 (1) of the Ontario Heritage Act, no site alteration or development is permitted on the subject lands until the required archaeological assessments have been completed and Ministry acknowledgement letters have been issued.

Recognizing that no archaeological assessment, regardless of intensity, can entirely negate the possibility of discovering deeply buried archaeological materials, staff recommend the inclusion of a standard archaeological warning clauses in the subdivision agreement should any resources be encountered through future construction works.

Appropriate preliminary conditions of draft plan approval have been included in the appendix to address these requirements.

### **Land Use Compatibility**

The PPS and NOP state that sensitive land uses (including residential) shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise, and other contaminants.

Regional staff reviewed the 'Noise Impact Study' (NIS), prepared by Stantec (dated July 19, 2024), which is scoped to the draft plan of subdivision area and evaluated noise from Port Davidson Road and Townline Road. Specifically, the NIS recommends the following:

- Compliance with Ontario Building Code (OBC) as the standard building components are expected to sufficiently mitigate the impact of road traffic noise.
- Warning Clauses are required for the first two rows of residential buildings directly exposed to Townline Road and for the first row of residential buildings along Port Davidson Road.

The assessment identified that the NIS and corresponding noise control measures in this report shall be reviewed and updated as needed once detailed design, floor plan, architectural drawings and wall / window construction details are available, including if the Outdoor Living Areas (OLA) are facing or exposed to Port Davidson Road.

Staff notes that Port Robinson Road as well as Townline Road east of Canborough Street (Regional Road 14) are Township Roads and, as such, the NIS's conclusions and recommended noise control measures are to be to the Township satisfaction with respect to local transportation infrastructure. Implementation of any noise mitigation requirements as a result of road traffic on Canborough Street and Townline Road (Regional Road 14), west of Canborough Street, if any, will be addressed through future site plan and / or condominium applications.

## **Natural Heritage**

The Block Plan 9 Area is impacted by the Region's Natural Environment System (NES), consisting of the Lower Twenty Mile Creek Provincially Significant Wetland (PSW) Complex, Significant Woodland, a permanent/intermittent watercourse, Other Woodland and Other Wetlands.

NOP policy 3.1.5.7.1 requires the completion of an Environmental Impact Study (EIS) when development or site alteration is proposed within 120 m of a PSW/Significant Woodland. An EIS (prepared by Myler Ecological Consulting, dated August 27, 2024) was circulated with the application for a preliminary review. Staff offer the following comments:

- The EIS has been completed to only support the Block Plan Process and does not in any way support the Plan of Subdivision Application.
- The EIS does not include any figures or maps that depict the proposed changes to the NES.
- There is insufficient information provided to ensure the survey work completed was done so in accordance with acceptable protocols.

- The following was proposed by the TOR for inclusion in the required EIS – the following items require additional analysis or information to support the submission:
  - Field studies to address gaps or updates to the SWS, including site-specific terrestrial field surveys.
    - Additional details are required to confirm survey effort and compliance with acceptable protocols
  - Breeding bird and vegetation surveys.
    - Additional details are required to confirm survey effort and compliance with acceptable protocols.
  - Screening for bat maternity roost habitat.
    - No screening appears to have been completed.
  - Assessment of the northern Provincially Significant Wetland limit within/adjacent the Block Plan Area 9 and of the Regional NES Other Wetlands, and follow-up with NPCA to stake wetland boundaries, if required.
    - Regional staff confirm that the north part of the PSW was observed to be an upland deciduous woodland, and that the wetland boundary was located well into the wooded feature. Staff also confirm that the mapped 'other wetland' located adjacent to the former rail corridor was observed to be an upland feature.
  - Woodland boundary (dripline) staking.
    - Regional staff note that although staff visited the subject lands to view NES constraints, the dripline of Significant Woodland and Other Woodland features were not staked. There was still some question while on-site whether the mapped 'other woodland' was large enough to achieve Regional designation criteria. The EIS does not include enough information to determine the presence/absence of 'other woodland'.
  - SWH screening.
    - Very limited analysis of SWH was included in the EIS. A SWH Screening Table should be included in the EIS.
  - SAR screening.
    - Very limited analysis of SAR was included in the EIS it is unclear if the surveys were completed in accordance with accepted protocols.
  - Refinement of the HDF management recommendations for the single HDF – Conservation swale segment.
    - While staff observed the location of the HDF swales on-site, it was the understanding of staff that a fulsome evaluation would be included in the EIS following the TRCA Headwater Drainage Features Guidelines. As such, there has not been sufficient information provided to determine the HDF management recommendations.
  - Summary of NHS and HDF constraints.
    - Lack of information provided in this regard. Staff are unable to determine the extent of NHS and HDF constraints with the

information provided in the EIS. A more fulsome evaluation of all potential NES features is required.

- Linkage assessment and recommendations.
  - Lack of assessment undertaken in this regard.
- Restoration area assessment and recommendations.
  - Lack of assessment provided in this regard.
- Environmental Impact Assessment (EIS) in consideration of the proposed development within Block Plan Area 9, including consideration of proposed road network, land use, servicing, and stormwater management plans, and development of avoidance, mitigation, and compensation/offsetting strategies to protect and enhance the NHS and its ecological functions.
  - No analysis was provided in this regard.
- High level recommendations for long-term stewardship of the NHS.
  - Lack of information provided in this regard.
- Discussion and consideration of the Block Plan Area 9 contribution to the Township-wide 30% natural cover objective.
  - Analysis should include whether there is a difference in natural coverage protection in the Block Plan Area between the SWS and the Block Plan proposal. The EIS does not include a percentage value related to natural cover within the west part of Area 9. However, the EIS does infer that the percentage does not achieve 30% natural cover objective described in OPA 63. A detailed analysis of natural cover is required.

The EIS must demonstrate that there will be no negative impact on the features or their ecological/hydrological function. Within settlement areas, mandatory buffers are required. The ecologically appropriate widths of the mandatory buffers are to be determined through the EIS. Development or site alteration is not permitted within the boundaries of either feature.

The subject lands were also assessed as part of the Smithville Subwatershed Study (SWS). The EIS should be informed by the results/recommendations of the SWS. Specifically, Section 3.3.1 of the SWS indicates that Master Environmental Services Plans (MESPs) are to be completed in support of the Block Plans for the future development areas encompassed in the SWS area. The MESPs are intended to build upon the SWS recommendations and refine the analyses and recommendations as appropriate based upon additional study and investigation, particularly for non-participating lands during the SWS process. Key Outcomes are listed within Section 3.3.1 as well as other items to be considered.

**Staff note that an EIS has not been circulated with the applications and, as such, there are no environmental planning conditions provided at this time.** Draft Plan conditions will be provided at a later date upon review and approval of the outstanding EIS.

## **Stormwater Management**

Based on the review of the Functional Servicing Report (FSR), prepared by Stantec, dated August 2024, which contains Appendix F – Preliminary Stormwater Management (SWM) Report (dated August 2023), Region staff offer the following comments:

- The FSR mainly provides a conceptual storm servicing plan for the areas west of Shurie Road and notes that another SWM pond will be required east of Shurie Road, in conjunction with development of the Alma lands. Please be advised that the storm outlet cannot cross the Regional Sewage Lagoon lands immediately east of Alma lands. The overall servicing plan for Block Plan Area 9 should confirm an adequate storm outlet(s) required to service Alma lands and other development east of Shurie Road.
- The preliminary SWM Report contains sizing details of the North SWM Pond for Stage 1 Draft Plan, which the development's storm outlet is to Townline Road culverts and ultimately to Twenty Mile Creek. The pond active storages for flood control does not meet the unitary storage requirements identified by the Smithville Subwatershed Study (SSWS). Note the unitary storage criteria were obtained from the continuous simulation and frequency analysis. The flood control storages of North Pond need to be enlarged to satisfy the requirements.
- It is Regional staff's understanding that a hydrologic investigation will be completed to identify the water balance requirements of the development. The SWM plan may need to be updated based on the study findings.
- Note sizing for the South Pond proposed for other properties within the Block Plan Area is incomplete. This pond should also comply with the criteria of the SSWS with respect to erosion and flood control.
- The FSR indicates foundation weeping tiles will be pumped to storm service laterals. This approach requires measures of preventing storm water surcharge and cuts off water infiltration. It is recommended that detail engineering design confirm Street A overland flow can be directed to the North Pond rather than Townline Road, and the feasibility to direct minor flow from the road between Townline Road and Street C to the pond.
- The future SWM facilities will be subject to the review and approval from Township staff to ensure local infrastructure requirements to be adequately addressed and obtain the necessary Environment Compliance Approval through the Township's CLI-ECA program.



## **Servicing**

### **Regional Sewage Pumping Station**

The FSR reviewed the capacity of the Smithville Sewage Pumping Station (SPS).

The Smithville SPS sewershed experiences significant Inflow/Infiltration (I/I) and has limited capacity. The current Smithville SPS has an operational capacity of 104 L/s and the current 2021 Master Servicing Plan (MSP) has indicated that an upgrade to the station is currently required and will be required to accommodate all anticipated growth in the SPS sewershed. An upgrade to the station is needed together with an I/I reduction program, which should be on-going to restore design capacity and potentially gain additional capacity in the system during rainfall events in order to allow for development. The Smithville SPS planned upgrade will be required to support all the development proposed in the Smithville Community Master Plan.

As noted in the FSR, the capacity of the station may be able to accommodate some of the flows from the Block 9 area, and the remaining area is to be directed to a new SPS to the south in accordance with the Township's Master Servicing Strategy. Further flow monitoring will be required to determine the actual flows in the system, and the FSR is to be updated to include current development applications in the urban area that are underway, draft approved, or registered to determine the overall new flow to the SPS. It is recommended that a draft plan condition be implemented by the Township to ensure capacity at the station is available through I/I reduction and/or station upgrade prior to registration of the subdivision.

In accordance with the current Township MSP, the majority of Block 9 will be serviced by a new pumping station and forcemain for this station to be assumed in the future by the Region in accordance with the Region's Sewage Pumping Station Policy. The current design standards for a Regional Pumping Station will need to be followed in partnership with Regional staff through the design process. Regional staff must review and approve the final design of the pumping station and forcemain; submission for the new station will be under the Region's CLI-ECA.

Niagara Region will only assume the station if the requested conditions of draft plan of subdivision approval are incorporated into the approved draft plan conditions and the Region's policy regarding assumption items has been completed. Furthermore, a condition requiring that the development be at 50% build out prior to assumption to ensure that the pumping station is operating in accordance with the proposed design and no wet weather flows being received by the station has been added to Appendix I.

An agreement between the Township and the developer will be required to be entered for the building of this station and an agreement between the Region and Township will need to be in place for the construction and maintenance of this station.

Regional staff note that the proposed block for the pumping station must meet the minimum land requirements of 40 metres by 40 metres.

### **Watermain Servicing**

The FSR has acknowledged that the Stage 1 Draft Plan can be serviced by the existing watermain system; sizing will be determined through future analysis. As per the report, the remainder of the Block will require Phase 2 of the Regional Trunk Watermain identified in the Townships MSP. Should the owner wish to proceed in advance of the Region constructing Phase 2 of the Regional Trunk Watermain, then the owner will need to enter into a front-ending agreement to construct the Regional watermain to Regional standards and requirements to the satisfaction of the Region.

### **Transportation**

Transportation Impact Study:

Region staff have reviewed the “Transportation Impact Study (TIS) for the Smithville 3A Block Plan Area 9 Development”, prepared by Stantec and dated August 19, 2024. Region staff offer the following comments:

- General comment - check that all turning movements are correctly labelled. For example, Section 8.0 Conclusions & Recommendations makes reference to a “Westbound left-turn movement” at the St Catharines Street and Industrial Park Road intersection, which does not exist at this three-legged intersection.
- Figure 4.11 and Figure 4.12 (Block Plan Area 9, without Phase 1 Site-generated Volume – AM Peak Hour & PM Peak Hour):

The figures appear to show lower trip volumes than those calculated in Table 4.1, which will underestimate the capacity analysis results in the subsequent scenarios. Please revise figures to reflect the total trips generated from block Area 9 without phase 1 as calculated in Table 4.1.

- Figure 5.1 (Existing Conditions Scenario (2024) – Weekday AM Peak Hour Traffic Volumes:

The traffic volumes shown at intersections of Townline Road with Port Davidson Road and Canborough Street are lower than the TMCs volumes in Appendix A. Please revise and edit volumes accordingly as this will underestimate the assessment results in the subsequent AM peak hour scenarios.

- Section 5.2 Existing Conditions Scenario (2024):

The TIS states, “the traffic count data at the five intersections were collected on June 13th, 2024, with the exception of Townline Road and St. Catharines Street,

which was collected on June 15th, 2023.” This should be revised to indicate the traffic count for the St. Catharines Street and Industrial Park Road was also collected on June 15th, 2023. Please refer to the TMCs attached in Appendix A.

- Section 5.3 Future Background Scenario (2030):

It is noted that traffic volumes used in the capacity analysis (attached in Appendix E) for Future Background Scenario (2030) - PM peak hour are lower than the volumes calculated in Figure 5.5: Future Background Scenario (2030)- Weekday PM Peak Hour Traffic Volumes. Please revise the capacity analysis, synchro reports, and results shown in Table 5.4 accordingly with the corrected volumes.

- As a general comment, the Region will monitor conditions to determine when various improvements (e.g. recommended signalization of St. Catharines Street and Industrial Park Road) are warranted. The Region notes that traffic patterns in the area could change following the potential future construction of a Downtown Smithville Bypass Route. Future improvements to Regional and municipal roads were also contemplated through the Smithville Master Community Plan and Smithville Transportation Master Plan recently prepared by the Township.

## **Waste Collection**

Niagara Region provides curbside waste collection for developments that meet the requirements of Niagara Region’s Waste Collection Policy. The subject property is eligible to receive Regional curbside waste collection provided that the owner brings the waste to the curbside on the designated pick-up day and that the following limits are not exceeded (based on current waste collection contract):

- No Limit green containers; and,
- 2 Garbage Containers per unit (Biweekly)
- Curbside Collection Only

The draft plan of subdivision was reviewed for the potential for Regional curbside waste collection services to be provided throughout the entirety of the proposed development. Region staff acknowledge that the single-detached lots and townhomes proposed along the future municipal streets will be eligible for Regional curbside waste collection services. Future engineering plans will need to be submitted for review and approval to ensure the design meets the current policy requirements. Please note that if the development is to be phased, in order to facilitate Regional curbside waste collection services, the owner will be required to submit a revised draft plan showing a temporary turn-around/cul-de-sac with a minimum curb radius of 12.8 metres for all dead-end streets.

Circular Materials Ontario is responsible for the delivery of residential Blue / Grey Box recycling collection services. The most up to date information regarding recycling can be found using the following link: <https://www.circularmaterials.ca/resident->

[communities/niagara-region/](#)

## Conclusion

As outlined in the discussion above, Regional staff are unable to confirm at this time whether the proposed Zoning By-law Amendment and Draft Plan of Subdivision applications are consistent with and conform to the PPS and NOP as the required EIS has not been provided.

A list of preliminary conditions for the proposed Draft Plan of Subdivision application are included in Appendix I for the information of Township staff and the applicant. These conditions are subject to change, including additional conditions with respect to environmental planning interests, upon review and approval of the EIS when formal comments are provided following circulation of the complete applications .

Regional staff are available to engage in additional discussions with the applicant and the Township regarding these requirements as needed. If you have any questions related to the above comments, please contact me at [Connor.Wilson@niagararegion.ca](mailto:Connor.Wilson@niagararegion.ca) or Pat Busnello at [pat.busnello@niagararegion.ca](mailto:pat.busnello@niagararegion.ca).

Kind Regards,



For: Connor Wilson  
Development Planner

cc: Pat Busnello, MCIP, RPP, Manager, Development Planning, Niagara Region  
Diana Morreale, MCIP, RPP, Director, Growth Management and Planning, Niagara Region  
Cara Lampman, Manager, Environmental Planning, Niagara Region  
Adam Boudens, Senior Environmental Planner, Niagara Region  
Susan Dunsmore, P. Eng., Acting Director, Infrastructure Planning and Development Engineering, Niagara Region  
Joshua Wilson, Acting Manager, Development Engineering, Niagara Region  
Philippe Biba, Development Approvals Technician, Niagara Region  
Maggie Ding, P.Eng., Stormwater Management Engineer, Niagara Region

## Appendix I

### Preliminary Regional Conditions of Draft Plan Approval

(for information purposes only)

1. That the contain provisions whereby the Owner agrees to implement the recommendations of the 'Noise Impact Study', prepared by Stantec (dated July 19, 2024).
2. That the Subdivision Agreement between the Owner and Township of West Lincoln contain the following warning clauses and included in offers of purchase and sale and / or lease agreements for the first row of dwellings along Port Davidson Road:

*"This dwelling unit has been designed with the provision for adding central air conditioning at the occupant's discretion. Installation of central air conditioning by the occupant in low and medium density developments will allow windows and exterior doors to remain closed, thereby ensuring that the indoor sound levels are within the sound level limits of [the Municipality and] the Ministry of the Environment, Conservation and Parks."*

*"Purchasers/tenants are advised that sound levels due to increasing road traffic may occasionally interfere with some activities of the dwelling occupants as the sound levels exceed the sound level limits of [the Municipality and] the Ministry of the Environment, Conservation and Parks."*

3. That the applicant/owner submit a Stage 3 Archaeological Assessment, prepared by a licensed archaeologist (and any required subsequent archaeological assessments) to the Ministry of Citizenship and Multiculturalism (MCM) and receive an acknowledgement letter from MCM (copied to Niagara Region) confirming that all archaeological resource concerns have met licensing and resource conservation requirements prior to any development on the site. The licensed archaeologist must engage with the appropriate First Nations and Indigenous community of closest cultural affiliation for the Stage 3 Archaeological Assessment, in accordance with the Standards and Guidelines for Consulting Archaeologists and Niagara Official Plan policy 7.11.1.5. No demolition, grading or other soil disturbances shall take place on the subject property prior to the issuance of a letter from the Ministry through Niagara Region confirming that all archaeological resource concerns have met licensing and resource conservation requirements.
4. That the following warning clause is included in the Subdivision Agreement between the Owner and Township of West Lincoln to protect for any potential archaeological resources that may be encountered during construction activities:

*"If deeply buried or previously undiscovered archaeological remains/resources are found during development activities on the subject lands, all activities must stop immediately. If the discovery is human remains, contact the Niagara*

*Regional Police Service and coroner to secure the site. If the discovery is not human remains, the area must be secured to prevent site disturbance. The project proponent must then follow the steps outlined in the Niagara Region Archaeological Management Plan: Appendix C."*

[Archaeological Management Plan - Niagara Region, Ontario](#)

5. That the owner provides a written acknowledgement to Niagara Region stating that draft approval of this subdivision does not include a commitment of servicing allocation by Niagara Region as servicing allocation will not be assigned until the plan is registered and that any pre-servicing will be at the sole risk and responsibility of the owner.
6. That the owner provides a written undertaking to Niagara Region stating that all Offers and Agreements of Purchase and Sale or Lease, which may be negotiated prior to registration of this subdivision shall contain a clause indicating that servicing allocation for the subdivision will not be assigned until the plan is registered, and a similar clause be inserted in the subdivision agreement between the owner and the Township.
7. That prior to final approval for registration of this plan of subdivision, the owner shall submit the design drawings [with calculations] for any new municipal sanitary and storm sewers, and stormwater management facilities required to service this development. The capacity in the Regional system is to be confirmed and copies of the approved CLI-ECA forms and final drawings must be forwarded to Niagara Region.
8. That prior to approval of the final plan, the owner shall submit detailed sanitary sewer design information (flows, timing, revised flows for any changes to development plans) for the subdivision, and prior to final approval, the anticipated design flows will be submitted along with flow monitoring information to evaluate if capacity is available at the Smithville Sewage Pumping Station. The report is to be sealed by a qualified professional engineer.
9. That the Owner submit a written undertaking to Niagara Region that acknowledges the sewershed of the Smithville Sewage Pumping Station has a servicing capacity that will not be able to accommodate the full development.
10. That the owner complies with the Regional Design standards for a Regional pumping station and forcemain, engage Regional staff in the design works and receive Niagara Regional approval prior to obtaining approval under the Region's CLI ECA.
11. That the owner transfers the pumping station land block to the Township and once the maintenance period is completed and the station is accepted by the Region and Township the block will be transferred to the Region.

12. That the subdivision agreement/servicing agreement between the developer/owner and the Township contain a clause stating that the assumption of the pumping station and forcemain will not occur until all the Regional conditions and policy conditions are completed as well as the subdivision has reached 50% of the build-out and Niagara Region has reviewed and approved the Operation and maintenance information provided, construction inspections for the station.
13. That the owner complies with the Regional Design standards for a Regional watermain, engage Regional staff in the design works and receive Niagara Regional approval prior to obtaining approval under the Region's Drinking Water License.
14. That the owner will be required to enter into a legal agreement with the Region for the construction/design of the Regional watermain to the satisfaction of the Region.
15. That prior to approval of the final plan or any on-site grading, the owner shall submit a detailed stormwater management plan for the subdivision and the following plans designed and sealed by a qualified professional engineer in accordance with the Ministry of the Environment, Conservation and Parks documents entitled 'Stormwater Management Planning and Design Manual March 2003' and 'Stormwater Quality Guidelines for New Development, May 1991', or their successors to Niagara Region Public Works Department (Growth Management and Planning Division) for review and approval:
  - Detailed lot grading, servicing and drainage plans, noting both existing and proposed grades and the means whereby overland flows will be accommodated across the site.
  - Detailed erosion and sedimentation control plans.
16. That the subdivision agreement between the owner and the Township contain provisions whereby the owner agrees to implement the approved plan(s) required in accordance with the approved Stormwater Management Plan.
17. That the owner/developer ensure that all streets and development blocks can provide access in accordance with Niagara Region's Corporate Policy and By-laws relating to the curbside collection of waste and recycling and complete the Application for Commencement of Collection prior to waste collection services commencing.
18. In order to be eligible for Regional curbside waste collection services, the owner will be required to provide a temporary turnaround/cul-de-sac with a minimum curb radius of 12.8 metres for all dead-end streets.

## Susan Smyth

---

**From:** Taran Lennard <tlennard@npca.ca>  
**Sent:** November 6, 2024 12:37 PM  
**To:** Susan Smyth  
**Subject:** RE: NPCA Response: Block Plan Application Preliminary Circulation (Block Plan Area 9 - Stage 3A) File No. 4000-001-24

Hi Susan,

Our Tech Staff have reviewed and offer the following comments. In principle, the NPCA has no concerns with the outfall location as sufficient SWM details are provided.

The NPCA offers no objections at a high level to the Karst Study, and offer no objections to the conclusion that the karst feature can be mitigated. The NPCA will require further information regarding the close-out process within the Study, to which this can be provided at a future submission date.

From that time, the NPCA will review the EIS once prepared and will be in a position to provide any further comments.

Thank you.



**Taran Lennard**  
Watershed Planner II

**Niagara Peninsula Conservation Authority (NPCA)**  
3350 Merrittville Highway | Unit 9 | Thorold, ON L2V 4Y6

905.788.3135 ext. 277  
[www.npca.ca](http://www.npca.ca)  
[tlennard@npca.ca](mailto:tlennard@npca.ca)

For more information on Permits & Planning, please go to the Permits & Planning webpage at <https://npca.ca/administration/permits>.

For mapping on features regulated by the NPCA please go to our GIS webpage at <https://gis-npca-camaps.opendata.arcgis.com/> and utilize our Watershed Explorer App or GIS viewer.

To send NPCA staff information regarding a potential violation of Ontario Regulation 41/24 please go to the NPCA Enforcement and Compliance webpage at <https://npca.ca/administration/enforcement-compliance>

---

**From:** Susan Smyth <:ssmyth@westlincoln.ca>  
**Sent:** October 31, 2024 10:33 AM  
**To:** Taran Lennard <tlennard@npca.ca>  
**Cc:** Paige Pearson <ppearson@npca.ca>  
**Subject:** RE: NPCA Response: Block Plan Application Preliminary Circulation (Block Plan Area 9 - Stage 3A) File No. 4000-001-24

Hi Taran,

I am just following up because we wanted to know if NPCA will provide some high level comments on the technical reports that you are able to review and determine if they satisfy your requirements from the Block Plan level and/or the




**From:** [Taran Lennard](#)  
**To:** [Susan Smyth](#)  
**Subject:** RE: Block Plan Area 9 - Stage 3A: Environmental Impact Study Report for Preliminary Agency Review  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.jpg](#)

---

Hi Susan,

The NPCA has reviewed the EIS titled 'Environmental Impact Statement Block 9 Smithville, Township of West Lincoln, ON', as prepared by GeoProcess and dated November 07, 2024. NPCA recognizes that the wetland identified within the EIS is associated with the regulated watercourse and headwater drainage features on subject lands. The NPCA is supportive of the proposed mitigation measure identified within the EIS to maintain the function to downstream features (e.g. sediment supply, water supply, seasonal wildlife habitat) by either keeping the HDF open or by replicating its function through the stormwater management strategy, which can include elements such as enhanced lot level conveyance such as bioswales, low-impact development measures, vegetated swales or constructed wetlands. Further elements will be provided through future submissions and/or detailed design. As such at a high level, the NPCA is supportive in principal with the EIS.

Thank you.

|                                                                                     |                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p><b>Taran Lennard</b><br/>Watershed Planner II</p> <p><b>Niagara Peninsula Conservation Authority (NPCA)</b><br/>3350 Merrittville Highway   Unit 9   Thorold, ON L2V 4Y6</p> <p>905.788.3135 ext. 277<br/><a href="http://www.npca.ca">www.npca.ca</a><br/><a href="mailto:tlennard@npca.ca">tlennard@npca.ca</a></p> |
|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

For more information on Permits & Planning, please go to the Permits & Planning webpage at <https://npca.ca/administration/permits>.

For mapping on features regulated by the NPCA please go to our GIS webpage at <https://gis-npca-camaps.opendata.arcgis.com/> and utilize our Watershed Explorer App or GIS viewer.

To send NPCA staff information regarding a potential violation of Ontario Regulation 41/24 please go to the NPCA Enforcement and Compliance webpage at <https://npca.ca/administration/enforcement-compliance>

---

**From:** Susan Smyth <[ssmyth@westlincoln.ca](mailto:ssmyth@westlincoln.ca)>  
**Sent:** November 25, 2024 12:43 PM  
**To:** Lampman, Cara <[Cara.Lampman@niagararegion.ca](mailto:Cara.Lampman@niagararegion.ca)>; Adam Boudens

**From:** [Taran Lennard](#)  
**To:** [Susan Smyth](#)  
**Subject:** NPCA Response -File: 4000-001-24 (Block Plan); 1601-008-24 (Area 9)  
**Date:** April 4, 2025 3:30:27 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image007.png](#)  
[RE Block Plan Area 9 - Stage 3A Environmental Impact Study Report for Preliminary Agency Review .msg](#)  
[RE NPCA Response Block Plan Application Preliminary Circulation \(Block Plan Area 9 - Stage 3A\) File No. 4000-001-24.msg](#)

---

Hi Susan,

NPCA's attached comments remain applicable. The NPCA would advise that our Agency would request a copy of the Hydrogeological Study for review, as there is known Karst in the area.

Thank you.



**Taran Lennard**  
Watershed Planner II

**Niagara Peninsula Conservation Authority (NPCA)**  
3350 Merrittville Highway | Unit 9 | Thorold, ON L2V 4Y6

905.788.3135 ext. 277

[www.npca.ca](http://www.npca.ca)

[tlennard@npca.ca](mailto:tlennard@npca.ca)

For more information on Permits & Planning, please go to the Permits & Planning webpage at <https://npca.ca/administration/permits>.

For mapping on features regulated by the NPCA please go to our GIS webpage at <https://gis-npca-camaps.opendata.arcgis.com/> and utilize our Watershed Explorer App or GIS viewer.

To send NPCA staff information regarding a potential violation of Ontario Regulation 41/24 please go to the NPCA Enforcement and Compliance webpage at <https://npca.ca/administration/enforcement-compliance>

---

**From:** Susan Smyth <[ssmyth@westlincoln.ca](mailto:ssmyth@westlincoln.ca)>

**Sent:** March 11, 2025 12:11 PM

**To:** Ben Agro <[bagro@westlincoln.ca](mailto:bagro@westlincoln.ca)>; Canada Post <[Thomas.Dell@canadapost.postescanada.ca](mailto:Thomas.Dell@canadapost.postescanada.ca)>; Carling Macdonald <[Carling.Macdonald@niagararegion.ca](mailto:Carling.Macdonald@niagararegion.ca)>; Catholic School Board <[clark.euale@ncdsb.com](mailto:clark.euale@ncdsb.com)>; Chamber of Commerce <[westlincolnchamber@bellnet.ca](mailto:westlincolnchamber@bellnet.ca)>; Cogeco <[randy.leppert@cogeco.com](mailto:randy.leppert@cogeco.com)>; Dennis Fisher <[dfisher@westlincoln.ca](mailto:dfisher@westlincoln.ca)>; Development Planning <[devtplanningapplications@niagararegion.ca](mailto:devtplanningapplications@niagararegion.ca)>; District School Board Niagara <[Michelle.McPhee@dsbn.org](mailto:Michelle.McPhee@dsbn.org)>; Enbridge <[MunicipalPlanning@enbridge.com](mailto:MunicipalPlanning@enbridge.com)>; First Nations <[executivedirector@fenfc.org](mailto:executivedirector@fenfc.org)>; Haudenosaunee <[info@hdi.land](mailto:info@hdi.land)>; Jennifer Bernard <[jbernard@westlincoln.ca](mailto:jbernard@westlincoln.ca)>; MCFN <[MCFN.Consultation@mncfn.ca](mailto:MCFN.Consultation@mncfn.ca)>; Metis

---

# Memo

**To:** Susan Smyth, Senior Planner  
**From:** Jennifer Bernard, Coordinator of Engineering Services  
**Date:** November 8, 2024  
**Re:** Block Plan Area 9 – Block Plan, Draft Plan of Subdivision, and Zoning By-law Amendment

---

Public Works has completed a review of the Block Plan Area 9 – Block Plan, Draft Plan of Subdivision, and Zoning By-law Amendment submission and provides the following comments:

## **Block Plan Area 9**

### **Block Plan Area 9 Land Use Concept Plan**

The transportation network of the Block Plan generally aligns with Schedule E-10 (South Community Area Land Use Plan) of OPA 63, however it is noted that the realignment of the Port Davidson Rd and Canborough Rd intersection has not been included. The Block Plan Area 9 Development Report notes this was not included intentionally as Lockbridge Development Inc. does not own the lands however it has been identified in OPA 63 Policy No. 6.11.7.4.6 h) and the Township's Transportation Master Plan (TMP) and should be identified in the Block Plan layout.

OPA 63 Policy No. 6.11.7.4.6.e) states Block Plans shall identify through the MESP the timing of the transportation improvements in relation to phasing, for Block Plan Area 9 this includes Townline Road between Canborough Street and St. Catharines Street (Regional Road 20) which is to be widened to three lanes (Project ID TWL-Road-17a in the TMP). This is noted in the Block Plan Area 9 Development Report however no details are provided on the timing of the upgrade.

### **Functional Servicing Report (August 2024)**

#### **Section 6.3 Block Plan Wastewater Servicing**

This section notes a location for the Port Davidson Rd pumping station which deviates from the Township's Water & Wastewater Master Servicing Plan (W&WWMSPP) due to a non-participating landowner where the station was to be located. This is a significant change and will require further analysis to confirm if there will be any impacts on the servicing strategy for Block Plan Areas 10 and 11, and the Phase 4 lands that are all to connect to this pumping station. The FSR should identify the proposed location of the pumping station and modelling will have to be completed to confirm serviceability of the Block Plan Areas 10 and 11 and Phase 4 lands. Refer to the **Peer Review Services** section of this memo for more information.

This section notes the depth of the sanitary sewer required to service the Alma lands by gravity. As they are a participating landowner in Block Plan Area 9, Public Works would like to see comments from their Engineer to confirm servicing has been reviewed.

## **Draft Plan of Subdivision Phase 1 (Stage 3A)**

### **Draft Plan of Subdivision Drawing**

Staff provided comments at the previous pre-consultation meetings that there are concerns for the future safety and operating efficiency of the proposed local collector road Street B. The proposed lots fronting Street B will not be supported by Public Works. The lots are to be oriented to face the local roads to maximize the efficiency of Street B as per OPA 63 Policy No. 6.11.7.4.4 f) and to align with the future lot orientation of the development to the west.

As the lands to the west of this site are developed with connections to Port Davidson Rd the through movements at the east-west intersections with Street B will increase. Staff will require a traffic study to determine how those intersections will function and what traffic control may be required as the Phases of the Block Plan progress or if there are intersection configurations possible to avoid the future need for all-way stop controls at the through intersections.

### **Functional Servicing Report (August 2024)**

Section 2.3 of the report notes the karst hazard identified in the Phase 1 lands and a Karst Assessment Report has been provided. A Professional Engineer in the appropriate discipline should provide confirmation there is no liability concerns if public infrastructure or a private structure is built over the closed out feature.

### **Section 5.0 Watermain Servicing**

The W&WWMSPP concluded that Stage 3A can connect to the existing 150mm watermain on Townline Rd based on information provided about the development at that time, and that the remainder of the Block Plan 9 area will require the Regional 400mm watermain to proceed. This is confirmed in Section 5.0 of the FSR.

Based on the water and fire flow requirements identified for the site and the Preliminary Servicing Plan proposing 200mm watermain internal to the development, the Township will have Aecom confirm through the Township's water model that the existing system is capable of meeting the demand once this application has been deemed complete. Refer to the **Peer Review Services** section of this memo for more information.

### **Section 6.0 Wastewater Servicing**

The W&WWMSPP identifies the need to upsize the sanitary sewer on Townline Road and Anderson Cres to the Twenty Mile Creek crossing to accommodate flows from this development and in consideration of future intensification. This project is in the Township's Development Charges Background Study and capital budget forecast.

The sanitary servicing section of the FSR proposes to connect to the existing sanitary sewer with no upgrades. Public Works had this proposal and all associated background information reviewed by a third party Engineering Consultant, Agile Infrastructure, their Technical Memorandum has been included.

The Technical Memorandum notes that the design flows presented in Stantec's sanitary design sheets are slightly underestimated and confirms the design flows identify a number of sewer sections where the capacity would be exceeded. The review also identified that the flow monitoring data used to promote connection to the existing sewer, indicates that during the largest storm event observed (which was below the 5-year design storm), the sewer is surcharging and there is no flow to the pumping station indicating there is an exceedance at the pumping station and a sewer backup occurred. A memo was provided by the Township on July 12, 2024 after the 2<sup>nd</sup> pre-consultation meeting noting there were concerns of surcharging on Anderson Cres and further analysis would need to be undertaken to determine the impacts of additional flows from this development. The Technical Memorandum from Agile Infrastructure makes recommendations including upsizing sections of the existing sewer to support Phase 1 of the development.

Further to the July 12, 2024 Township memo regarding surcharging on Anderson Cres and overflows to the environment, the Township is taking a proactive approach by undertaking an Interim Wastewater System Capacity Management Strategy.

Based on the work completed for the W&WWMSPP and the recommendations from Agile Infrastructure's review, there is sufficient data to support that upsizing of the sewer on Anderson Cres and Townline Rd should be completed with this development to mitigate risk and minimize sewer overflows to the environment while allowing for future intensification. A Front Ending Agreement between the proponent and the Township for the design and construction of this sewer could be considered.

Public Works staff would like to schedule a meeting with Stantec and the Niagara Region to review the sanitary servicing concerns identified and agree on the strategy moving forward. The work being undertaken as part of the Interim Wastewater System Capacity Management Strategy may assist with determining the strategy to be undertaken.

#### Peer Review Services

The Township has engaged Aecom to provide peer review services for the transportation, water and wastewater components of the MESP. This would include an update to the transportation, water and wastewater models to confirm the proposal addresses the requirements of the Township's Master Plans.

The Niagara Region will be performing the Stormwater Management Plan reviews on behalf of the Township. All storm pond outlets are to be fully investigated and confirmed to be legal outlets, with any required easements, that can be maintained by the Township. Any proposals that do not align with the Subwatershed Study work may require further peer review services.

The peer reviews will be completed at the expense of the proponent.

## Susan Smyth

---

**From:** Wilson, Connor <Connor.Wilson@niagararegion.ca>  
**Sent:** December 19, 2024 3:10 PM  
**To:** Susan Smyth  
**Cc:** Lampman, Cara; Boudens, Adam  
**Subject:** RE: Block Plan Area 9 - Stage 3A: Environmental Impact Study Report for Preliminary Agency Review

Good afternoon Susan

Please see the below Preliminary EIS comments for your files.

### Preliminary EIS Review

Regional staff completed a preliminary review of the EIS circulated with the applications and recommend that a revised EIS be prepared to address the following items before the applications are deemed complete.

The subject area is impacted by the Region's Natural Environment System (NES), consisting of the Lower Twenty Mile Creek Provincially Significant Wetland (PSW) Complex, Significant Woodland, a permanent/intermittent watercourse, Other Woodland and Other Wetlands.

Niagara Official Plan (NOP) policy 3.1.5.7.1 requires the completion of an Environmental Impact Study (EIS) when development or site alteration is proposed within 120 metres of a PSW/Significant Woodland. An EIS (prepared by Geoprocess Research Associates, dated November 7, 2024) was circulated with the application for review. As such, Regional staff offer the following comments:

- Previous comments from Regional Staff noted that additional details were required to confirm if sufficient survey effort was undertaken and surveys were in compliance with acceptable protocols. Regional staff require that the applicant submit an EIS Addendum that clearly outlines the methodology of the field investigations that occurred for the subject property by previous consultants.

Details, including but not limited to, dates, survey locations, weather conditions, should be compiled from previous reports and summarized in the current submission. For example, it is unclear if a robust vegetation inventory was completed as part of the Subwatershed Study (SWS), or if additional survey effort is required in support of the Draft Plan of Subdivision.

- The EIS indicates that information/data collected by Myler Ecological Consulting was incorporated into this EIS; however, it is unclear how that data was utilized. Please clarify in a revised report.
- Staff note that the typically acceptable shelf-life of ecological field surveys is 5 years and that it appears that the majority of information utilized in this EIS was gathered in 2020. As such, updated surveys should be considered to ensure the data remains relevant.
- Staff note that an 'Other Woodland' is mapped adjacent to the northern boundary of the subject lands. This area is identified with ELC codes CUW and FOD7. It is unclear if these treed communities achieve 'Other Woodland' designation criteria. Please assess this area in accordance with NOP policies and confirm if an 'other woodland' is present on the subject

lands.

If an 'other woodland' is present, consistent with NOP Policy 3.1.11.2, development or site alteration shall not be permitted unless it has been demonstrated through the preparation of an EIS that there will be no negative impacts on the other woodland or its ecological function. Further, when a proponent proposes to remove a woodland or portion of a woodland, a Woodland Enhancement Plan is required. Requirements of the Woodland Enhancement Plan are outlined in the NOP Glossary of Terms.

- The EIS indicates that consistent with the SWS Phase 2 Report (Wood, 2022a), a secondary linkage, 50 metres in width, is identified along the entire length of the eastern property boundary. The EIS does not dispute the 50-metre width; however, the Draft Plan of Subdivision appears to only show a 23-metre-wide linkage. Please clarify.
- It is unclear to Regional staff how the findings of the EIS have come to conclusions that differ from the SWS, considering it appears that the EIS is based on field studies that were completed in support of the SWS. In particular:
  - A restoration area was recommended within the SWS; however, the EIS does not include the recommendation for a restoration area on the subject property. Regional staff would expect that the specific location of the restoration area be depicted within this site-specific EIS. If a restoration area is not proposed, thorough justification will be required to explain how additional field surveys have informed this new conclusion and how the Block Plan area will achieve the 30% natural cover objective described in OPA 63.

Please feel free to reach out if you have any questions.

Thank you



**Connor Wilson**  
Development Planner

Niagara Region, 1815 Sir Isaac Brock Way,  
Thorold, ON, L2V 4T7

**P:** (905) 980-6000 ext. 3399

**W:** [www.niagararegion.ca](http://www.niagararegion.ca)

**E:** [connor.wilson@niagararegion.ca](mailto:connor.wilson@niagararegion.ca)

---

**From:** Susan Smyth <[ssmyth@westlincoln.ca](mailto:ssmyth@westlincoln.ca)>

**Sent:** Monday, November 25, 2024 12:43 PM

**To:** Lampman, Cara <[Cara.Lampman@niagararegion.ca](mailto:Cara.Lampman@niagararegion.ca)>; Boudens, Adam <[Adam.Boudens@niagararegion.ca](mailto:Adam.Boudens@niagararegion.ca)>; Wilson, Connor <[Connor.Wilson@niagararegion.ca](mailto:Connor.Wilson@niagararegion.ca)>; Development Planning Applications <[devtplanningapplications@niagararegion.ca](mailto:devtplanningapplications@niagararegion.ca)>; Jennifer Bernard <[jbernard@westlincoln.ca](mailto:jbernard@westlincoln.ca)>; Paige Pearson <[ppearson@npca.ca](mailto:ppearson@npca.ca)>; Taran Lennard <[tlennard@npca.ca](mailto:tlennard@npca.ca)>; Dunsmore, Susan <[Susan.Dunsmore@niagararegion.ca](mailto:Susan.Dunsmore@niagararegion.ca)>

**Cc:** Gerrit Boerema <[gboerema@westlincoln.ca](mailto:gboerema@westlincoln.ca)>; Mike DiPaola <[mdipaola@westlincoln.ca](mailto:mdipaola@westlincoln.ca)>

**Subject:** Block Plan Area 9 - Stage 3A: Environmental Impact Study Report for Preliminary Agency Review

**GROWTH AND SUSTAINABILITY DEPARTMENT**

Date: January 22, 2025

TO: Arcadis Professional Services (Canada) Inc.  
360 James Street North, Suite 200  
Hamilton, ON L8L 1H5


ATTN: Jared Marcus – Arcadis (Agent)

**SUBJECT: Block Plan Area 9 – Stage 3A  
Block Plan Application (File No.4000-001-24)  
Zoning By-law Amendment Application (File No. 1601-008-24)  
Draft Plan of Subdivision Application (File No. 2000-093-24)  
Lockbridge Development Inc.; Judy Hendler; TEK Corporation (Owners)  
ENVIRONMENTAL IMPACT STUDY COMMENTS**

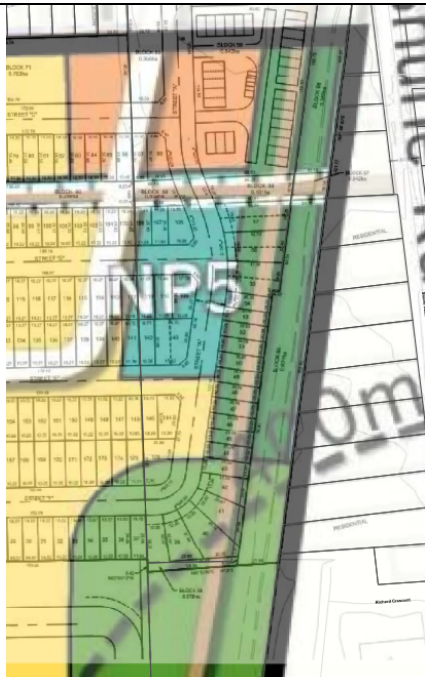
We have received the Environmental Impact Study prepared by GeoProcess Research Associates, dated November 7, 2024 (Project No. P2024-922) for the Smithville Municipal Community Plan (MCP) Block Plan Area 9 Stage 3A.

The Region and the NPCA have already provided comments. Please note that these comments need to be addressed prior to any recommendation report can be brought forward to Council. Please also note that the Township is in the process of retaining the Region for ongoing Environmental Review following the proclamation date of March 31, 2025.

Upon the Planning review, please refer to the following comments for consideration.

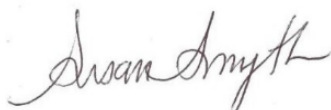
|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Page 32</b></p> | <p><b>Section 7.1.1 Proposed Linkages</b><br/>The statement “50 m in width and running the entire length of the Subject Property. It would provide a direct connection between the Twenty Mile Creek and North Creek corridors while passing through woodlands and PSWs in between the two valleys. The proposed Linkage also provides abundant naturalization opportunities for the lands which are currently manicured lawns and agricultural fields.”</p> <p>Is the EIS suggesting this is the only linkage in the study area?</p> <p>Although the pipeline representative indicated that a natural trail – linkage can be provided in this easement, the</p>  |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|



|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                | <p>Township is also asking for the linkage along the eastern edge of the study area from Townline Road south to the limit of the block plan area and reaching the restoration area.</p> <p>Last sentence states “No buffer for the proposed Linkage feature is included in the draft plan for the Subject Property.” Township staff are not clear on this statement.</p>                                                                                                                                                                                                                                                                                       |
| <b>Page 46</b> | <p>The page numbering is off – likely a page break.</p> <p>Section 8.4 Impact Summary, there is a statement that reads “As the woodland is comprised of one early successional species, it does not represent a diverse and high-quality wildlife habitat and does not support any significant species, SAR or their habitats. The ecological functions that this feature currently provides will be replaced by planting a diverse range of native species within the Linkage feature, which will support approximately <b>four times</b> the natural cover currently provided within the woodland.</p> <p>Is this suggested a 4:1 ratio for restoration?</p> |
| <b>Map 2</b>   | <p>The map shows the recommended restoration area which lies within the limits of the subject lands although the draft plan shows no restoration area, roughly lots 33-57 and the condo block. Township Staff would like to see the restoration area connected with the linkage which will provide both pedestrian and an ecological connectivity in the study area. The EIS needs to justify any removal or alignment of the restoration area that deviates from the Subwatershed Study and the Master Community Plan.</p>                                                 |

Should you have any questions, please do not hesitate to contact myself or the commenting agency directly.

Sincerely,



Susan Smyth, CPT  
Senior Planner

Cc: *Gerrit Boerema, Director of Growth and Sustainability*

X:\pb-Planning\2. Block Plans\2024\4000-001-24 - Block Plan 9 Stage 3A\5. Comments\4000-001-24 - First Preliminary Submission Comment Letter.docx



Enbridge Gas Inc.  
500 Consumers Road  
North York, Ontario M2J 1P8  
Canada

March 14, 2025

Susan Smyth  
Senior Planner  
Township of West Lincoln  
Planning Department  
318 Canborough Street  
P.O. Box 400  
Smithville, ON L0R 2A0

Dear Susan,

Re: Draft Plan of Subdivision, Block Plan, Zoning By-law Amendment  
Lockbridge Development Inc., Tek Corporation, and Judy Hendler  
Block Plan Area 9 (Stage 3A)  
Township of West Lincoln  
File No.: 2000-93-24, 4000-001-24, 1601-008-24

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.

Please always call before you dig, see web link for additional details:  
<https://www.enbridgegas.com/safety/digging-safety-for-contractors>

The Owner agrees to provide Enbridge Gas Inc. (Enbridge Gas) the necessary easements at no cost and/or agreements required by Enbridge Gas for the provision of local gas services for this project, in a form satisfactory to Enbridge Gas.

Sincerely,

**Willie Cornelio** CET  
Sr Analyst Municipal Planning  
Engineering

ENBRIDGE  
TEL: 416-495-6411  
500 Consumers Rd, North York, ON M2J1P8  
[enbridge.com](https://www.enbridge.com)  
Safety. Integrity. Respect. Inclusion.