



Public Works: Infrastructure Planning and Development Division

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Via Email Only

March 9, 2026

Region File: PLSD202401087, PLZBA202401088

Susan Smyth, CPT
Manager, Community Planning and Design
Township of West Lincoln
318 Canborough Street
Smithville, ON L0R 2A0

Dear Ms. Smyth:

Re: Regional Comments
Application type: Block Plan Area 9 Plan, Draft Plan of Subdivision, and Zoning By-Law Amendment
Township File Numbers: 1601-008-24, 2000-93-24
Applicants/Owners: Lockbridge Development Inc., Judy Hendler, TEK Corporation
Agent: Arcadis (c/o: Jared Marcus)
Location: 260202000923300, 260202000923400, and 260202000923500
Township of West Lincoln

Regional Infrastructure Planning and Development staff has reviewed the resubmission (third submission) for the Block Plan Area 9 application and the Zoning By-Law Amendment and Draft Plan of Subdivision applications for the Phase 1 lands. The lands are located east of Port Davidson Road, west of Shurie Road, and south of Townline Road (Roll No. 260202000923300, 260202000923400, and 260202000923500) in the Township of West Lincoln. The extent of the Phase 1 lands is also shown on the Block Plan land use plan.

Smithville Block Plan Area 9

Block Plan Area 9 consists of approximately 60.89 hectares (150.71 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, west of the Regional Smithville Sewage Lagoons, and north of the Smithville urban boundary.

The third submission of the Block Plan Land Use plan, prepared by Arcadis and dated February 11, 2026, sets out a mix of low and medium density residential uses as well as a commercial/mixed-use node, parklands/open spaces, trails, linkages, 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, a natural feature/buffer area adjacent to the proposed trail central to the block area, and an 'Alternative Sanitary Pumping Station' location in the southwest corner of the Block Plan. 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 updated Phase 1 '*Draft Plan of Subdivision, Smithville Block 9*' drawing, prepared by Arcadis (dated November 4, 2025) consists of 13.43 hectares (Phase 1) situated south of Townline Road, to the east of Port Davidson Road and west of Shurie Road. The draft plan proposes the following land uses:

- 177 lots for single detached dwellings;
- seven (7) lots for 14 semi detached dwellings;
- one (1) block for 31 townhouse dwellings;
- three (3) blocks for stormwater management;
- five (5) gas easement blocks;
- two (2) blocks for linkages;
- one (1) block for open space walkway;
- one (1) block for neighborhood trail;
- 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.

Provincial and Regional Comments

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. Regional comments were provided to the Township on October 31, 2024, April 14, 2025, and December 5, 2025.

The following comments regarding the natural environment are considered to be advice provided under the Planning Services Agreement between the Region and the Township of West Lincoln. Transportation, Regional servicing, stormwater management, and waste collection comments are provided in accordance with the Memorandum of Understanding between the Region and the Township and are Regional requirements to be addressed.

Natural Environment System

Regional staff have reviewed the following documents that were circulated with the Final Submission Package associated with the Draft Plan of Subdivision and Zoning By-law Amendment Applications for the subject lands identified as Block Plan Area 9 (Stage 3A):

- Comment Response Matrix prepared by Arcadis, dated February 12, 2026.
- Southeast Smithville Block Plan Area 9 prepared by Arcadis, dated February 11, 2026.

Based on our review, staff offer the following comments for the Township's consideration.

Previous Regional comments (dated December 5, 2025) requested clarification on how the proposed reduction in wildlife linkage width and restoration area would continue to support achievement of the natural heritage cover target in accordance with the Smithville MCP Secondary Plan. The Comment Response Matrix indicates that the 30% target could not be reasonably achieved while also meeting growth objectives and suggests that the target was intended to be applied on a Town-wide basis. Arcadis further recommends that the Township consider amending the policy, expressing concern that it is not implementable if applied across the MCP area or on a block-by-block basis.

Regional staff respectfully disagree with the assertion that the 30% natural heritage cover target was intended to be applied Town-wide. Consistent with Policy 6.11.7.3 of OPA 63, the target is to be achieved across the Smithville MCP Secondary Plan area. To support this objective, the Subwatershed Study identified lands within the Secondary Plan area where natural heritage features currently exist, historically existed, and where restoration opportunities would most effectively enhance the overall system. Accordingly, portions of the subject lands have been identified in the OPA 63 Schedules for protection as part of the natural environment system.

Given the lack of information provided by the application to support the reduction in linkage width and restoration area, it is recommended that the Township require the applicant/owner(s) of the subject lands to amend the current Draft Plan of Subdivision and Zoning By-law applications to include additional restoration areas sufficient to achieve the natural heritage cover target. Those areas should match the Secondary Plan or be supported by an updated Environmental Impact Study. Alternatively, should

the Township consider allowing the owner to compensate for the reduced restoration area through restoration or enhancement works within future phases under their ownership, it is recommended that appropriate planning tools and/or legal agreements be established to formally secure those commitments.

As it relates specifically to the linkage area identified within the proposed Draft Plan of Subdivision, staff have included recommended conditions in Appendix 1.

Transportation

Comments provided in the letter dated December 5, 2025, remain applicable.

Stormwater Management

Appendix F of the Functional Servicing Report (FSR) (Stantec, dated October 2025) addresses the North SWM facility for Phase I development and a South facility for future development. Based on staff's review of the Phase I SWM plan, the following comments are provided:

- The plan proposes that stormwater from the major areas of Phase 1 development will be directed to the North SWM facility (wet pond) prior to discharging to the 900mm culvert on Townline Road. Remaining areas will drain to a 600mm culvert located southwest of Townline Road and Shurie Road. Future development that cannot be directed to the North facility should provide onsite water quality treatment.
- Please note that unitary volumes include extended detention storage for erosion control. The North facility shows that the top of active storage (9,149 m³) exceeds the required unitary volumes; however, the discharge rate corresponding to the 100-year unitary storage (8,706 m³) surpasses the allowable rate of 1.34 m³/s. The pond outlet may need modification to meet this requirement.
- Table 4, which compares flows, is not considered necessary because the flow assessment methodologies used in the Smithville Subwatershed Study (SWS) and the Report differ.
- Additional details on the Outlet Rise are required to clarify how water will enter to the Riser to the 90mm orifice plate. The civil engineering plan should include DICB details referenced in the Report and confirm its rim elevation at 186.20 m.
- At the discretion of Township staff, the following items regarding SWM facility operation and maintenance may be required:
 - a) A reverse-slope pipe to draw cooler water from below the permanent pool and prevent inlet clogging.
 - b) Confirmation of safety buffers as outlined in the MECP Design Manual, or indication that the pond will not be publicly accessible.

- c) Provisions for future maintenance access and sediment dredging/drying areas in the pond design.
- d) An Inspection and Maintenance Manual
- Based on the figure 'Proposed Conditions Drainage Areas', the Report should include a table summarizing total drainage catchment areas and overall imperviousness, along with parameters of each drainage catchment (e.g., ID, area, imperviousness) draining to the SWM facility and outlets.
- Other details requiring review include:
 - Whether a 'Standard HYD' should apply to Catchment 213.
 - The difference between TIMP and XIMP for Catchment 211 (SWM block).
 - Application of a runoff coefficient of 0.8 for an outlet pipe and 0.6 for an orifice plate.
 - Clarification of drainage directions for Catchments 213 & 203 on the figure 'VO Schematic – Proposed Conditions'.

Please note that native soil conditions do not preclude implementation of Low Impact Development practices, such as rain gardens, absorbent soils, increased lawn soil depth, and tree pits, which help to reduce stormwater runoff and improve water quality at the sources.

A condition is included in Appendix 2 requiring submission of a detailed SWM plan and associated plans prior to final approval and any on-site grading.

Regional staff notes that the design of the South SWM facility is similar to the North facility and, as such, the above comments may also apply. Staff will review the South facility in detail during the future development stage.

Regional Sewage Pumping Station

Comments provided in the letter dated December 5, 2025, remain applicable.

In addition, staff have reviewed the Comment Response Matrix (prepared by Arcadis and dated February 12, 2026) which proposes several modifications to the Region's draft plan conditions to which staff offer the following comments:

The applicant requests that Condition #8 be revised such that Smithville Sewage Pumping Station (SPS) will not be available to accommodate the "full block plan limits" as opposed to the "full development." Staff maintain that the sewershed of the Smithville Sewage Pumping Station has a servicing capacity that will not be able to accommodate the full development, and while planned Region and Township improvements related to the Smithville Sewage Pumping Station and Townline Road Sanitary sewer will create additional capacity, allocation of this capacity will be subject to the Township's wastewater allocation policy and modelling and is not guaranteed to the subject

development. The associated draft plan condition included in Appendix 2 has been revised to provide this clarification.

The applicant requests that Conditions #9 to #11 (relating to the construction and transfer of a new sewage pumping station) be removed since they are not applicable to the current Block 9, Phase 1 subdivision but rather will be subject to future approvals pertaining to development on Block Plan Area 10 or Block Plan 9, Phase 2. While staff are in agreement with this contention, it is suggested that these conditions remain (similar to Conditions #12 and #13 relating to watermain improvements) with the understanding that these conditions would be cleared on the basis that they are not the responsibility of the Block 9, Phase 1 subdivision.

WATERMAIN SERVICING

Comments provided in the letter dated December 5, 2025, remain applicable. Conditions of draft plan approval are included in Appendix 2 to address the construction of the required Regional watermain.

Waste Collection

Comments provided in the letter dated December 5, 2025, remain applicable. Staff note for further information that further to previous comments, waste collection will be assessed at the time of site plan application for Block 185.

In addition, please be advised that the owner is responsible for securing private recycling collection services for commercial and institutional uses.

Conclusion

From a Provincial and Regional policy standpoint, it is the responsibility of the Township to evaluate whether the proposed applications are consistent with the *Provincial Planning Statement, 2024* and conform to the *Niagara Official Plan, 2022*.

In accordance with the Planning Services Agreement between the Region and Township to provide planning advice with respect to environmental review, Regional staff recommend that the Township require the owners of the subject property to amend the current Draft Plan of Subdivision and Zoning Bylaw Application to include additional restoration areas sufficient to achieve the natural heritage cover target. Those areas should match the Secondary Plan or be supported by an updated Environmental Impact Study. Alternatively, should the Township consider allowing the owner to compensate for the reduced restoration area through restoration or enhancement works within future phases under their ownership, it is recommended that appropriate planning tools and/or legal agreements be established to formally secure those commitments.

In accordance with the Memorandum of Understanding for Engineering Services between the Township and Region, staff advise that the proposed development is

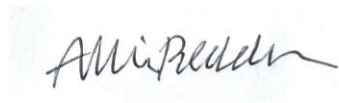
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located within the Smithville SPS sewershed. Regional staff maintain that there may not be sufficient capacity to support the entirety of the development at this time. Future capacity depends on redirecting flows to a new wastewater SPS, which is part of the Township's Master Servicing Plan. In the interim, any available capacity at the SPS will depend on reducing wet weather flows and completing other system upgrades.

Preliminary Regional conditions of draft plan approval to address these matters have been updated in Appendix 2.

If you have any questions regarding the above comments, please contact the undersigned at Alexandra.Reddon@niagararegion.ca, or Pat Busnello, Manager of Development Planning at Pat.Busnello@niagararegion.ca.

Kind regards,



Allie Reddon
Development Planner

cc: Pat Busnello, MCIP, RPP, Manager of Development Planning
Adam Boudens, Senior Environmental Planner / Ecologist
Maggie Ding, P.Eng., Stormwater Management Engineer
Philippe Biba, Development Approvals Technician
Josh Wilson, P. Eng., Manager of Development Engineering
Cara Lampman, BES, Associate Director Development Services
Susan Dunsmore, P. Eng., Associate Director Development Engineering

Appendix 1

Preliminary Recommended Conditions of Draft Plan Approval as per Planning Services Agreement between the Region and Township Smithville Block 9 Draft Plan, West Lincoln

1. Implementation of EIS Recommendations

That the subdivision agreement between the owners and Township of West Lincoln includes provisions requiring the owner to implement the mitigation measures outlined in the Environmental Impact Study (GeoProcess Research Associates, October 14, 2025), including but not limited to:

- a. Ensuring a visual search of the work area is conducted before work commences each day, particularly for the period when most wildlife is active (April 1st to October 31st). Visual searches will target snakes, turtles, and other ground-dwelling wildlife such as small mammals. Visual searches should also include inspecting machinery and equipment left in the work area overnight before starting equipment to ensure that wildlife is safely out of the work area.
- b. Restricting vegetation removal to October 1–March 14 (outside nesting and active bat season). If removal is required outside this window, a qualified ecologist and/or Ministry of Environment, Conservation and Parks must be consulted.
- c. Directing all building and site lighting downward and away from natural areas to the extent feasible.
- d. Regularly inspecting all sediment and erosion control measures to ensure they are in working order. Any deficiencies observed are to be recorded and immediately reported to the site contractor.
- e. Prohibiting the storage of materials or equipment within natural features or buffers.
- f. Requiring street trees to be native species, where practical.
- g. Heavy machinery on site should be washed prior to entering the Subject Property to prevent the spread of invasive species.
- h. Implementing dust control measures to reduce dust impacts on adjacent lands.
- i. Incorporating bird-friendly design measures (e.g., City of Toronto’s “Best Practices for Bird-Friendly Glass” and “Effective Lighting”).

2. Erosion and Sediment Control (ESC) Plan

That an Erosion and Sediment Control (ESC) Plan, consistent with the recommendations of the Environmental Impact Study prepared by GeoProcess Research Associates, October 14, 2025), be prepared to the satisfaction of the Township of West Lincoln. Measures must be maintained throughout construction until disturbed areas are stabilized. Muddy water shall not leave the site.

3. Grading Plan

That a Grading Plan be prepared to the satisfaction of the Township demonstrating no grading within natural features or buffers. The plan shall identify stockpile locations outside features and buffers.

4. Restoration Plan

That a Restoration Plan, prepared by a full member of the Ontario Association of Landscape Architects (OALA), be completed to the satisfaction of the Township. The plan must restore the Linkage with native plantings and incorporate invasive species removal where feasible. Consistent with the recommendations of the Environmental Impact Study (EIS) prepared by GeoProcess Research Associates, October 14, 2025), wildlife habitat features should be provided within the Linkage area, such as raptor poles, bat boxes, pollinator boxes, terrestrial log tangles and rock/brush piles. Please refer to the EIS for more information. Providing nature interpretative signage is also recommended for educational purposes.

5. Securities

That the developer provides a Letter of Credit in the amount of the approved estimated cost of restoration works. The Township may draw on the security to ensure installation if required.

6. Ecological Monitoring Plan

That an Ecological Monitoring Plan be prepared to the satisfaction of the Township to evaluate the success of restoration works. Reports (including photographs and recommendations for corrective action) must be submitted to the Township by September 1st of years 1 through 3.

7. Agreement to Implement Plans

That the subdivision agreement between the owners and Township of West Lincoln requires the owner to implement the approved ESC Plan, Grading Plan, Restoration Plan, and Ecological Monitoring Plan.

Appendix 2

Regional Conditions of Draft Plan Approval

Smithville Block 9 Draft Plan of Subdivision, West Lincoln

In accordance with the Memorandum of Understanding for Engineering Review between the Township and Region, the following are Regional Conditions of Approval.

Stormwater Management

1. 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 Planning and Development Services 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.
2. 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.

Servicing

3. 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.
4. 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.
5. That prior to final approval for registration of this plan of subdivision, the Developer/Owner shall submit the final design drawings (with calculations) for the sanitary and storm drainage systems required to service the development. Capacity in the Regional system is to be confirmed prior to the municipality

signing off on any CLI ECA forms. Copies of the approved CLI ECA forms and are to be forwarded to Niagara Region.

6. 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. The report is to be sealed by a qualified professional engineer. Prior to final approval, the Region will require sign-off from the Township that capacity is available in the system and has been allocated to this development, subject to their wastewater allocation policy and modelling.
7. That the subdivision agreement / servicing agreement between the Owner and the Township contain a clause that post flow monitoring shall be completed to verify that the estimated wet weather flows are being met in the field following the construction of sanitary sewers and prior to their assumption by the Township. If the verification is unsuccessful, further mitigation measures may be required.
8. 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. Allocation of additional capacity resulting from the planned Region and Township improvements related to the Smithville Sewage Pumping Station and Townline Road Sanitary sewer will be subject to the Township's wastewater allocation policy and modelling and is not guaranteed to the subject development.
9. That the Developer/Owner complies with the Regional design standards for a Regional sewage pumping station and forcemain, engage Regional staff in the design works and receive Niagara Region approval prior to obtaining approval under the Region's CLI ECA.
10. That the Owner transfers the sewage pumping station land block to the Township and once the maintenance period is completed and the pumping station is accepted by the Region and Township the block will be transferred to the Region.
11. That the subdivision agreement / servicing agreement between the Owner and the Township contain a clause stating that assumption of the sewage pumping station and forcemain will not occur until all the Regional conditions and policy conditions are cleared, development of the subdivision has reached 50% of build-out, and Niagara Region has reviewed and approved the operation and maintenance information provided including construction inspections for the pumping station.
12. 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.

13. 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.

Waste Collection

14. That the Developer/Owner shall comply with Niagara Region's Procedure for Requirements for Waste Collection and ensure all streets and development blocks can permit access to and egress from collection locations throughout all phases of development. On any streets where through passage is not provided/maintained, the Developer/Owner shall provide a temporary cul-de-sac / turnaround area designed according to the required minimum dimensions.
15. That the Owner shall register a temporary easement in favour of Niagara Region for any waste collection turnaround area that encroaches onto private lands, until such time that through-connection is provided.
16. That the Developer/Owner will be required to submit an Application for Commencement of Collection in order to initiate Regional waste collection services at the new development. Applicable terms and conditions are listed on the agreement form.
17. The Owner is advised that in order to receive Regional waste collection services on private roadways and/or properties, a properly executed Indemnity Agreement must be submitted to Niagara Region by the Owner or by a property management company with signing authority for the Owner.