

51 & 55 Hawkesville Road, Woolwich

DPC & OPA/ZBA Applications

1st Submission Comments & Responses

Application Submitted: February 4, 2025 Deemed Complete: March 25, 2025

Staff Contact: Stephen Dykstra, 519-669-1647 or sdykstra@woolwich.ca

Staff Contact	Agency		Response
Township of Woolwich			
Stephen Dykstra	Senior Planner	The following comments were provided by Proximity. They generally require that a rail safety assessment be completed and additional information with respect to the SWMP that is close to the CN lands.	A railway crossing assessment has been completed in Section 5.2 of the updated TIS.
		These comments are being provided at this time as your team may want to assemble this document now.	Noted
Ashkan Matlabi proximity@cn.ca		CN Proximity	
		Thank you for consulting with CN regarding the proposed developments at 51-55 Hawkesville Rd. CN is in favor of implementing a minimum 15 meter safety setback and a minimum 1.83 meter high chain link fence along the mutual property line.	As requested, a 1.83m tall chain link fence has been shown along the mutual property line on the engineering drawings. Additionally, the 15m setback has also been shown on the engineering drawings.
		The Transport Canada regulation requires for a travelled way or a road intersection to be designed at no less than 30 meters to the nearest rail of a grade crossing where the railway speed is more than 25 km/h. The rail corridor adjacent to the proposed development is a Spur Line with speeds less than 25km/h, however, given the additional traffic volume generated by the proposed 165 dwellings, we share the same opinion that the access entrance to the development should be pushed further from the crossing. The access located near the rail crossing is proposed as an emergency access. Clarifications should be provided on potential impacts that the rail operations may have on emergency measures and response times. We recommend for the proponent to complete a rail crossing safety assessment to evaluate if any upgrades to the crossing will be triggered.	It is noted that there is no longer an exclusive site emergency access to Hawkesville Road. The latest site plan illustrates two full moves street connections to Hawkesville Road. In Section 5.2 (Railway Crossing Assessment) of the updated TIS, the proposed site connections provide enough separation from the existing railway crossing on Hawkesville Road to the east of the site. Additionally, no changes to the existing warning system at the crossing are warranted.
		Lastly, we notice that the storm water management pond is placed adjacent to the rail corridor. CN recommends for a SWM report to evaluated reassuring that the storm water management facility is designed to control storm water runoff to pre-development conditions including the duration and volume of the flow and accordingly have no impacts on the railway right of way, including ditches, culverts and tracks.	As requested, the stormwater management design controls post-development flows to the pre-development levels, and does not direct any controlled or uncontrolled flows to the railway right-of-way.
		CN could provide further and more specific comments following a review of a rail crossing safety assessment.	Acknowledged.
Region of Waterloo			
Tanikia Kinear, (519) 897-5961	Region of Waterloo, Planning	Staff have reviewed the report titled Functional Servicing and Stormwater Management Report, 51-55 Hawkesville Road, Township of Woolwich, including the Preliminary Servicing Plan (SSP-1 & SSP-2) and Preliminary Grading Plans (GP-1 & GP-2) dated January 2025 prepared by GEI Consultants Canada Ltd and have found the plans and report satisfactory. For the purposes of the planning approvals associated with this development application, Corridor Development deems this matter concluded.	Noted that the Region Deemed the application concluded for Corridor Management. Although a revised plan is being submitted.

Staff Contact	Agency		Response
		Staff have provided the following comments, which should be reflected in the engineering plans submitted with the future Site Plan application, if they are not already included in the drawings. This will not affect the Official Plan and Zoning By-law Amendment application but will be required with the future Site Plan application.	Noted. The revised submission is only for the OPA and ZBA at this time.
		1. The minimum setback distance between the railway property and any building constructed on an adjacent property is fifteen (15) metres along the Waterloo and Huron Spur;	Noted, to be addressed in the Draft Plan of Subdivision submission
		2. No drainage shall be permitted onto the Regional rail corridor. All site drainage is to be captured and redirected to proper location away from the rail corridor;	As requested, all drainage is directed away from the Regional rail corridor.
		3. A condition of site plan approval for any development along the rail corridor property will be that the owner install, (not maintain), at its expense, a chain link fence at least 1.83 metres in height, at 0.15m (6”) onto the rail property, along the length of the mutual property line. The chain link fence is not allowed to have any type of gate to the rail corridor;	As requested, a 1.83m tall chain link fence has been shown along the mutual property line with the rail corridor. As there is a proposed retaining wall along the mutual property line, our proposal is to install this fence along the top of the retaining wall, to act as a guard. Should the fence be installed 0.15m onto the rail property, it would not be seen by residents at 51 Hawkesville Road, as the fence would be installed below to top of wall elevation.
		4. The Region of Waterloo recommends that a safety berm be constructed to a height of two (2) meters above rail elevation; and	Acknowledged. A retaining wall has been proposed along the mutual property line to direct drainage away from the rail corridor. Please note that should a berm be constructed, some drainage will be directed from 51 Hawkesville Road to the rail corridor.
		5. Shallow utilities that need to cross a Regional Road shall be placed within or immediately adjacent to the restoration limits of the deep service road impacts, and the restoration works are ultimately the responsibility of the Developer/Owner;	Acknowledged.
		6. If there is more than one road cut including curb removals the extent of the hard surface restoration will be at the discretion of Regional Corridor Management. This may result in the extent of the asphalt restoration to be the full limits of the hard surface impacts;	Acknowledged.
		7. Show full excavation areas required for unused service removals and show full depth repaving for the entire area from edge of pavement to edge of nearest travel lane. Show 1.0m step joints as a hatched area around limits of saw cut (to edge of travel lane or Centre line of road) and add a note to drawing for areas impacted that says "1.0m wide step joint as per RMOW Dwg. 207. Minimum 2.0m wide asphalt overlay longitudinal transition to be installed as per RMOW Dwg. 208 until full depth asphalt is restored. " Show this on both existing and proposed condition drawings. These drawings can be found at the following link: https://www.regionofwaterloo.ca/en/living-here/resources/Design-Standards/2025-Unit-Price-Contract-Supplemental-General-Conditions-and-Standard-Specifications.PDF	No service removals are proposed on Hawkesville Road as part of this development.
		Any new servicing connection(s), modifications to existing servicing, modifications to previously approved servicing plans or removal of existing services would require Regional approval through a separate process of Municipal Consent. Municipal Consent must be provided prior to any works commencing within the Regional right-of-way. For Servicing approval the applicant will be required to submit through the Region of Waterloo website (https://rmow.permitcentral.ca/).	Acknowledged.
		Prior approval must be obtained from the Region of Waterloo by anyone planning to work on or adjacent to a Regional road. A work permit is required for anyone wanting to occupy a Regional road, shoulder, sidewalk or right-of-way, even if the work is not expected to damage the road. The permit must be obtained in advance of the work being done via the Region of Waterloo website (https://rmow.permitcentral.ca/).	Acknowledged.

Staff Contact	Agency		Response
Will Towns, Senior Planner 519-616-1868	Region of Waterloo Regional Growth & Development Services	The Region has received concurrent application circulations pertaining to a draft plan of condominium, Official Plan amendment (OPA) and zoning by-law amendment (ZBA) for lands located at 51 and 55 Hawkesville Road in St. Jacobs in the Township of Woolwich (Township file number 2025-05). The application proposes a residential neighbourhood comprised of 151 dwelling units with two points of access to Hawkesville Road. The concept plan specifically includes: - Single-detached dwellings (17 lots) - Street-fronting townhouses (55 units) - Double stacked townhouses (34 units) - Triple stacked townhouses (45 units) - Three outdoor amenity areas (3294 square meters in total)	Noted
		Please note that as per the adoption of Regional Official Plan Amendment 6 and modifications made by the Province through Bill 162, the subject lands are located within the St. Jacobs Township Urban Area and Designated Greenfield Area in the Regional Official Plan (ROP), with the southernmost portion of the lands designated Significant Valley in the ROP. A portion of the subject lands are designated Residential and Ancillary and Environmental Protection in the Township of Woolwich Official Plan. The remaining lands are designated Prime Agricultural Areas in the Township Official Plan, and zoned Agricultural (A) in Township Zoning By-law. Regional staff understand that the OPA is required to bring the designation in the Township Official Plan into conformity with the designation in the ROP (i.e. incorporate the lands within the Township's Settlement Area Boundary, and redesignate the developable portion of the lands as Residential and Ancillary). The ZBA proposes to change the zone categories of the lands to Residential 7 (RES-7) and Open Space 2 (OS-2); permit single-detached dwellings within the RES-7 zone; and seek site-specific relief from interior side yard and building line setback requirements.	Acknowledged. As described in the updated PJR, the applicant is proposing a revised concept predicated on a Draft Plan of Subdivision which will be submitted following the review of the updated concept and OPA/ZBLA applications. Thhe purpose of the Official Plan Amendment remains unchanged. The zoning by-law amendment has been revised to reflect the proposed Draft Plan of Subdivision which seeks to apply RES-5, RES-7 and OS zones.
		A pre-consultation meeting was held on December 4, 2023, and a Record of Pre-consultation was issued on August 11, 2023 prior to the proclamation of Bill 23 (the More Homes Built Faster Act, 2022) for the Region of Waterloo. As a result, the following comments reflect the Region's responsibilities post-Bill 23.	Noted.
		Water Services	
		Regional staff have reviewed the report entitled "Functional Servicing and Stormwater Management Report, 51-55 Hawkesville Road, Township of Woolwich (St. Jacobs)" prepared by GEI Consultants Canada Ltd., dated January 2025 from a water and wastewater service perspective, and provide the following comments:	
		Section 4.1 of the report states the site is part of Waterloo Pressure Zone 4, which is incorrect. The site is located in the St. Jacobs pressure zone. It is correct that this development is part of the Integrated Urban System for water supply.	As requested, Section 4.1 has been revised to indicate that the site is located within the St. Jacobs pressure zone.
		The proposed 151 residential units would contribute an additional 351-382 people to the St Jacobs Wastewater Treatment Plant (WWTP) service area. The available capacity at the plant as of year-end 2023 is 1,038. While the WWTP has capacity for this application in isolation, the Region must review the proposal in the context of other development applications located in the St Jacobs WWTP service area.	See revised plan, which contemplates a reduction in the overall unit count. The revised concept contemplates 110-139 units, of which 16 are single-detached units, 44-58 are street townhouse units, and 50-65 are medium density units. This equates to a net PPJ/ha density of 41.1 - 51.4, with an expected population of 281.3 – 352.1.
		The Region is aware of several other development applications within the St. Jacobs WWTP service area which if all approved as proposed would exceed the available capacity. Please be advised that should the available capacity be exhausted through these developments, development in other parts of the St. Jacobs WWTP service area may be restricted. The 2025 Water and Wastewater Monitoring Report will be published shortly with updates to the year-end 2024 available capacity. Regional staff will provide updated figures to the Township as soon as possible, and the Township should confirm available capacity prior to draft approval.	The Staging Policy is not yet in place, but the number of people in capacity falls below the 357 people contemplated in the Draft Staging Policy report supported by staff and presented to Council.

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		Section 4.2 of the report correctly states that the Environmental Assessment for the St Jacobs WWTP is underway. Completion is anticipated in Q1 2026.	Noted.
		The report does not confirm that the proposed development can be supplied with the required fire flow from the municipal water system. Detailed fire demand calculations and an assessment of the firefighting capacity of the existing system must be provided in an addendum or revised report prior to OPA/ZBA approval.	As requested, fire flow calculations have been provided in the updated Functional Servicing and Stormwater Management Report (GEI Consultants Canada Ltd., dated December 2025).
		Corridor Planning	
		Condition of Approval for OPA/ZBA/Draft Plan of Condominium	Noted.
		Approval of the Noise and Railway Vibration Study and Transportation Impact Study is required prior to final approval of the OPA/ZBA and Draft Plan of Condominium applications.	Updated Transportation Study has been provided. Updated Noise study to be provided with Draft Plan of Subdivision application.
		Environmental Noise	
		Regional staff have received and reviewed the report entitled “Noise and Vibration Feasibility Study, Proposed Residential Development 51-55 Hawkesville Road, Township of Woolwich,” prepared by HGC Noise Vibration Acoustics and dated January 22, 2025, and provide the following comments regarding transportation (Regional road and Regionally-owned rail line) noise and vibration and associated recommendations:	Noted.
		The report and consultant’s affidavit indicate that the noise and vibration assessment has adequately considered the Railway Association of Canada/Federation of Canadian Municipalities’ Railway Guideline for New Development in Proximity to Railway Operations (RAC/FCM Guideline, 2013), and that these recommendations are appropriately reflected in the preliminary design of the proposed development.	Noted, to be addressed in the Draft Plan of Subdivision submission or subsequent Site Plan.
		The report indicates that there will be transportation noise impacts from Regional Road No. 17 (Hawkesville Road) as well as rail noise impacts from the Regionally-owned spur Line (on which CN Rail also operates), and that the acoustical impacts are above acceptable levels. For spur lines, the RAC/FCM Guideline line indicates that a 15 metre setback and no safety barrier (i.e. earthen berm or wall) need be provided. While not specifically referenced in the study as requested, Section 10 b) in the Planning Justification Report (prepared by Up Consulting, dated January 28, 2025) indicate this consideration and the Region is in agreement that the setback represents appropriate mitigation in light of the track type and rail traffic volume.	Noted, to be addressed in the Draft Plan of Subdivision submission, but 15m setback has been consistently provided for all iterations of a plan.
		To address road impacts from Hawkesville Road, mitigation – including central air conditioning for certain units, the provision for air conditioning for others, brick veneer or equivalent masonry construction for exterior walls, upgraded window glazing and noise warning clauses – are required to ensure indoor noise levels do not exceed acceptable levels noted in NPC-300 and NPC-216. The location, installation and sound ratings of future air conditioning devices should comply with NPC-300.	Mitigation measures to be incorporated in proposed dwelling units where required.
		The report indicates that noise levels in the Outdoor Living Areas (OLAs) in the backyards of all townhome blocks with exposure to Hawkesville Road exceed the MECP limit (55 dBA) by 3 dBA. The report notes that the MECP (in Section C7.1.1 of NPC-300) considers this range of excess acceptable with the inclusion of a noise warning clause. The report also indicates that most dwellings will require central air conditioning (or be designed with the provision to add central air conditioning at the occupant’s discretion), and all dwelling units will require a Type I noise warning clause to notify future residents of rail noise excesses.	Mitigation measures to be incorporated in proposed dwelling units where required.

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		The study recommends preliminary glazing requirements for blocks with flanking exposure to road and rail noise, some of which are noted as significant (STC-30 to STC-40). However, the study also notes that these requirements will need to be refined once building designs and floor-to-window ratios are further notes that once detailed floor plans and building elevations are available, an acoustical consultant will review the drawings and provide refined glazing specifications based on the actual window-to-floor area ratios. The requirement to complete an updated study will be required in a registered development agreement with the Region implemented as a condition of draft approval for the plan of condominium.	Noted, to be addressed in the Draft Plan of Subdivision submission or subsequent Site Plan.
		As the road traffic noise source, Regional Road No. 17 (Hawkesville Road), and rail noise source are under the Region's jurisdiction, an agreement with the Region of Waterloo to implement the recommendations of the noise study will be required as a condition of draft approval for the plan of condominium. This agreement will also require that the following noise warning clauses identified in the study be included in agreements of Offers of Purchase and Sale, lease/rental agreements and the condominium declaration:	Agreement with Region to be implemented at the time of approval. The appropriate warning clauses will be inserted into the APS
		All Dwelling Units	
		Type I	
		<i>Canadian National Railway Company or its assigns or successors in interest has or have a rights-of-way within 300 metres from the land the subject hereof. There may be alterations to or expansions of the railway facilities on such rights-of-way in the future including the possibility that the railway or its assigns or successors as aforesaid may expand its operations, which expansion may affect the living environment of the residents in the vicinity, notwithstanding the inclusion of any noise and vibration attenuating measures in the design of the development and individual dwelling(s). CNR will not be responsible for any complaints or claims arising from use of such facilities and/or operations on, over or under the aforesaid rights-of-way.</i>	Will make this a part of a subdivision agreement and/or site plan agreement and APS's
		Locations A (Units 118-123), B (Units 74-117), C (Units 41-44), D (Units 124-151) and E (Units 1-6)	
		Type A	
		<i>Purchasers/tenants are advised that sound levels due to increasing road and rail 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.</i>	Will make this a part of a subdivision agreement and/or site plan agreement and APS's
		Locations C (Units 41-44), D (Units 124-151) and E (Units 1-6)	
		Type C	
		<i>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 limits of the Municipality and the Ministry of the Environment.</i>	Will make this a part of a subdivision agreement and/or site plan agreement and APS's
		Locations A (Units 118-123) and B (Units 74-117)	
		Type D	

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		<i>This dwelling unit has been supplied with a central air conditioning system with 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.</i>	Will make this a part of a subdivision agreement and/or site plan agreement and APS's
		Prior to the issuance of any building permits, a Professional Engineer will be required to certify that the noise attenuation measures are incorporated in the building plans and upon completion of construction, a Professional Engineer will certify that the dwelling units have been constructed accordingly.	Will get sign off from HGC at the appropriate time prior to occupancy.
		Overall, Regional staff accept the recommendations of the environmental noise and vibration study and are satisfied that the RAC/FCM Guidelines have been appropriately considered in the analysis and mitigation recommendations as they pertain to environmental noise.	Noted.
		Transportation Impact Study (TIS)	
		Regional staff have also received and reviewed the study entitled "Transportation Impact Study, 51 Hawkesville Road, St Jacobs, ON" prepared by prepared by Paradigm Transportation Solutions Ltd. and dated January 2025. The following comments are provided for the Township and applicant's consideration. Note that additional comments on the TIS are forthcoming.	Noted
		Given that additional and significant development is proposed on the lands to the north, the TIS for 52 Hawkesville Road may determine that a left-turn lane on Hawkesville Road is warranted. To account for this possibility, Regional staff recommend that the proposed accesses for both 51-55 Hawkesville Road and 52 Hawkesville Road be coordinated and designed to be aligned on both sides of the intersection.	The accesses to 51 Hawkesville Road and 52 Hawkesville Road have been aligned to be opposite of each other.
		To enhance safety and in recognition of the short separation distance proposed, the Region would request that the applicant attempt to relocate the proposed emergency access as far as possible from the active rail crossing due to sightlines and the skew of the rail crossing with Hawkesville Road (a 60 degree intersection). The crossing may require upgraded controls from the current flashing light poles due to the new access. Additional information and/or confirmation will be provided to the applicant in follow-up comments.	The emergency access has been taken out of the plan and replaced with a second full access further away from the rail crossing.
		At the subject land's interface with the at-grade rail crossing, the conveyance of a daylight triangle to the Region will be required as a condition of draft approval. Precise dimensions are being confirmed and will be communicated to the applicant as soon as possible.	Noted
		Conditions of Future Site Plan Application	
		A Regional Road Access Permit, grading and Storm Water Management would be required as conditions of draft approval and/or prior to final approval of a future site plan application.	Acknowledged.
		Access Permit/TIS/Access Regulation	
		A Regional Access Permit will be required for the proposed accesses to Hawkesville Road (including the emergency access). The applicant will be responsible for all costs associated with the proposed accesses. Fees for the issuance of these permits is \$230 each.	Acknowledged.
		A Regional Access Permit (no fee) will also be required for the closure of the existing access to Hawkesville Road. The application for Access Permits (including closures) can be found on the Region's website at: https://forms.regionofwaterloo.ca/ePay/PDLS-Online-Payment-Forms/Commercial-Access-Permit-Application	Acknowledged.

Staff Contact	Agency		Response
		Stormwater Management & Site Grading	
		In addition to comments from Water Services presented above, Regional staff have also reviewed the “Functional Servicing and Stormwater Management Report, 51-55 Hawkesville Road, Township of Woolwich (St. Jacobs)” prepared by GEI Consultants Canada Ltd., dated January 2025 in relation to the Regional road. Detailed comments are appended to this letter – Regional staff accept the report for the purposes of OPA, ZBA and the draft plan of condominium, and provide a range of comments to be addressed through the future site plan application.	Acknowledged.
		Beyond the specific comments for site plan appended, the applicant must also submit detailed existing conditions/removals, landscaping, site grading/drainage control, and site servicing plans with the future site plan application. This should include drainage details for the subject property, abutting properties, and the public road allowance so as to ensure compatible drainage. Please show thereon all existing and proposed connections to municipal storm sewers, sanitary sewers and watermains, as well as all detailed erosion and siltation control features, all to the Region’s satisfaction. The site must be graded in accordance with the approved plan and the Regional road allowance must be restored to the Region’s satisfaction. Please also be advised that any new servicing connections or updates to existing servicing would require Regional approval through a separate process of Municipal Consent.	Acknowledged.
		Grand River Transit (GRT)	
		Please note that GRT has no plans to extend service to the subject property. The nearest transit stop is located approximately 700 metres away on Sawmill Road. As such, GRT has no transit infrastructure requirements associated with the draft plan of condominium.	Acknowledged.
		Hydrogeology and Source Water Protection	
		The subject lands are not located in a wellhead protection area. Regional staff have reviewed the Salt Management Plan (prepared by GEI Consultants, dated January 2025) provided with the application as required by ROP policy 8.B.3 for multi-residential developments, and find it satisfactory. Implementation of the plan’s recommendations in the condominium declaration will be required as a condition of draft approval.	Acknowledged.
		Please note that a geothermal prohibition was requested at the pre-submission stage on a precautionary basis in light of known contamination threats in the vicinity. However, staff are now satisfied that these threats are sufficiently separated from the subject lands by the Conestogo River and therefore the Region will not require the geothermal energy system prohibition within the amending zoning by-law for the site.	Acknowledged.
		Street Naming	
		Regional staff note that the internal roadways (A-E) have not yet been assigned names. For Emergency Services planning purposes, the Region will require as a condition of draft approval that the owner/applicant review the proposed name(s) with Regional staff prior to final approval.	Noted. Names forthcoming per Township requirements.
		Waste Management	

Staff Contact	Agency		Response
		The Region provides waste collection services as deemed eligible by By-law 17-007. The Region's current (2022) Waste Collection Guidelines are available here: https://www.regionofwaterloo.ca/en/living-here/resources/Documents/Waste/Waste-Collection-Guidelines-2022-AODA.pdf	Noted.
		Please note the Region's Waste Collection Guidelines may be updated in 2026 with the introduction of cart-style collection and a new waste collection contract. By the time this development is built, the service eligibility of this site may need to be reviewed.	Noted.
		As noted in the Region's pre-submission comments (October 3, 2024) the Region's Waste Collection Guidelines (Section 3.3) outlines the requirements for multi-residential units fronting a private road, as follows:	Medium Density block to be serviced with private collection. All other units are located on a public street and will be eligible for public collection.
		The internal road layout must permit continuous collection by collection vehicles to drive through freely, without reversing;	Noted.
		All roads must have a minimum width of six metres, excluding parking spaces;	Noted.
		The turning radius from the centre line must be a minimum of 13 meters on all turns;	Noted.
		All units must have individual driveways;	Noted.
		Private roads must meet the requirements set out by the Area Municipality and be structurally adequate to prevent damage by and support a fully loaded Collection Vehicle (approximately 35 tonnes);	Noted.
		Overhead clearance throughout the site must be a minimum of 7.5 metres and be free from obstructions such as overhangs, basketball nets, awnings, utility wires, balconies, and must be kept clear of tree branches, etc.; and	Noted.
		A "Terms and Conditions of Service – Internal Collection" form (Appendix A), must be completed, signed and accepted by the Region prior to the commencement of waste collection service.	Noted.
		Regional staff have reviewed the proposed development. Note that the site includes non-eligible buildings/units that would not be compatible with our waste collection guidelines – therefore, service may be tentatively approved for only the units that have individual driveways (highlighted in yellow within the figure below) for curbside waste collection of the following waste streams: Garbage, Bulky items, Green bin and Yard Waste	Noted.
		Any units not highlighted (circled in red) would have to have their own separate, private waste collection, at their own expense.	Private collection to be provided pending a further review of the Draft Plan of Subdivisio submission
		<i>SEE MAP</i>	
		At this time, approval should be considered tentative as construction will need to be completed with full occupancy before waste collection service is activated. A Regional Waste Inspector will be required to attend the finished site to perform an assessment of the complex to ensure compatibility with Regional service at that time. A Terms and Conditions for Service Agreement will also need to be signed by a representative of the condominium board to ensure all parties are aware of the expectations as well as authorizing access to the property for the purposes of waste collection. The terms and conditions shall also be reflected in the approved condominium declaration.	Noted.

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		Please note that this is also tentative with regards to the Region's Waste Collection Guidelines, which are slated to be updated in 2025 to align with major service changes in 2026 (i.e. automated cart collection for eligible residential properties). This tentative service eligibility approval may have to be reviewed again at that time to ensure compliance with our new service. It is the responsibility of the developer and/or condominium corporation to arrange temporary waste collection from the complex until Regional service is activated.	Noted.
		Due to recent waste collection service changes, the Region is no longer responsible for the collection of recycling waste from residential properties and any request for recycling collection will have to be requested from the current program administrator, Emterra Environmental. The Owner/Applicant is encouraged to reach out to the provider at customercareont@emterra.ca or 1-888-597-1541.	Noted.
		In line with these pending changes and the tentative approval identified, the applicant will be required as a condition of draft approval to confirm the availability and extent of waste collection services with the Region prior to registration.	Noted.
		Environmental Threats & Site Contamination	
		Pursuant to Bill 23 (More Homes Built Faster Act) the Township is now responsible for determining requirements associated with site contamination. The following information is provided as access to the Region's Threats Inventory Database (TID) has not yet been transferred to the Township of Woolwich:	Addressed through a peer review submission
		For the Township's awareness, the TID considers the active rail spur adjacent to the subject lands to be a "medium" threat. The TID identifies no other "medium" or "high" threats associated with current or past land uses on or adjacent to the subject lands.	Addressed through a peer review submission
		Regional Fees	
		As per the Regional Fees and Charges By-law 24-052, the review fee for a plan of condominium is \$3150 + \$100/unit to a maximum of \$6,150. The Region received payment of \$17,150, inclusive of the condominium (\$6,150), OPA (\$7,000), ZBA (\$3,000), and Transportation Impact Study review fee (\$500) on February 5, 2025.	Noted.
		Please note that in light of Bill 23 and a changing role in the planning framework, Regional OPA fees not applicable when circulated concurrently with a ZBA application. As such, the Region has not cashed the cheque received in February, which will be returned. The applicant is advised to provide a new cheque to the Region for \$10,150.	Noted.
		Conclusions	
		As per the foregoing and prior to Township of Woolwich Council considering the OPA, ZBA and draft plan of condominium applications, the applicant is required to provide an update or addendum to the Functional Servicing Report with Fire Underwriters Survey calculations demonstrating available fire flow capacity and address comments related to the location of the proposed emergency access.	Noted.
		General Comments	
		Any future development on the lands subject to the above-noted application will be subject to the provisions of Regional Development Charge By-law 19-037 or any successor thereof.	Noted.

Staff Contact	Agency		Response
		Please accept this letter as our request for a copy of the decision pertaining to this application. Should you have any questions, please do not hesitate to contact me.	Noted.
/NSHIP OF WOOLWICH			
Ainley Group	Township Peer Reviewer	Environmental Impact Study	
		Section 3.1	
		Section 3.1 provides a summary of the existing physiography and topography of the subject property, including a description of surface soils. The description of surface soils includes a discussion of soils observed as part of a single soil sample collected by the Consultant. This section of the report notes that further soil analysis will be completed in the summer. The Consultant should confirm if the additional sampling was completed, and if the results of this additional sampling modifies the description of existing soil conditions or changes the assessment of impacts.	Further soil analysis was completed during the summer (7/26/2024). The results only confirm the extent of the MAM (wetland) polygon and confirming the existence of a vegetation community does not affect the descriptions of existing soil conditions nor the assessment of impacts. This will be provided in a revised EIS.
		Section 3.2.1	
		Section 3.2.1 of the EIS notes that 10 ELC polygons were detected within the study area (i.e. subject lands + 120 area surrounding); however, twenty-five polygons are listed within Table 2. The Consultant should clarify the number of polygons within the study area.	The text has been clarified to state the total number of polygons detected within the subject and adjacent lands is 25 with 11 unique vegetation communities, confirmed with the ELC mapping. This will be provided in a revised EIS.
		Section 3.3.3	
		Section 3.3.3 notes a total of 193 call sequences were recorded; primarily Northern Hoary Bat and other low-frequency bats (Silver-haired bat and Big Brown Bat), noting that these species are not considered at risk in Ontario. In January of 2025 both Silver-haired bat and Northern Hoary Bat were listed as Endangered species in Ontario. The Consultant should confirm if the presence of these additional SAR bats influences the results of the impact assessment.	We can confirm that the additional SAR bats detected do not influence the results of the impact assessment, so long as the removal of buildings and trees providing suitable habitat does not impact critical life history windows of SAR bats. Updated recommendations for enhancement of these additional SAR bats detected during field surveys will be provided in a revised EIS.
		Section 3.4.1	
		Section 3.4.1 of the report should be updated to include the additional SAR bat species observed on the subject property.	The table and accompanying text in section 3.4.1. has been updated to include the two additional SAR bat species. This will be provided in a revised EIS.
		Section 3.4.5	
		Section 3.4.5 provides a summary of the wetland features present on the subject property and includes a review of the wetland and comparison to GRCA Policy Analysis for Development Within Anthropogenic Wetlands. The Consultant should confirm whether the results of this analysis have been shared with GRCA, and / or if GRCA has provided any comments in regard to the potential development within the wetland on the subject property. The consultant and/or design team should ensure that coordination with other disciplines such as functional servicing and geotechnical is undertaken regarding the assumptions / expectations in Table 6. Should any of the expectations in Table 6 change, a secondary review of GRCA policy criteria should be undertaken to ensure conformity.	We can confirm that the results of the wetland comparison has been shared with GRCA, however, we have not yet received any comments from GRCA on this matter.

Staff Contact	Agency		Response
		Figure 4 / 5	
		The description of Figures 4 and 5 within the EIS suggests that one is looking downstream (Figure 4), and one is facing upstream (Figure 5); however, the image appears to be the same for both figures. The Consultant should update these figures as necessary.	The incorrect timing window has been removed from the text, leaving on the correct timing window (vegetation clearing permitted from September 1 to March 31). This will be provided in a revised EIS.
		Section 4.1.2	
		Section 4.1.2 notes that to reduce the risk of damaging or disturbing bird nests and contravening the MBCA, vegetation clearing will occur between August 16 and March 31. The report then follows to say that vegetation clearing should not take place within the active nesting season between approximately April 1 and August 31 (allows for a vegetation clearing window of September 1 to March 31). The Consultant should clarify which vegetation clearing window is to apply at the subject property.	The incorrect timing window has been removed from the text, leaving on the correct timing window (vegetation clearing permitted from September 1 to March 31). This will be provided in a revised EIS.
		Section 4.2.2	
		Section 4.2.2 should be updated to reflect the additional SAR bat species that were observed on the subject property.	The text in section 4.2.2. has been updated to include the two additional SAR bat species. This will be provided in a revised EIS.
		Section 8.3.3	
		Section 8.3.3 recommends the construction of 0.18 ha replacement pond (minimum size) as a method of habitat enhancement for the loss of the existing wetland feature, with specific consideration for overwintering turtles and amphibian breeding habitat. The proposed pond design elements included in Section 8.3 appear to be appropriate for developing similar offsetting habitat, and reduced distance to the Conestoga River for the proposed pond location may provide for increase movement to and from the feature. The consultant / design team should ensure during future stages of the property development that the pond design incorporates design elements as presented in the EIS, with consideration to replicating existing features to the extent possible. The construction of this feature should also be discussed with the Conservation Authority given that the feature is proposed to be placed within the flood plain of Conestoga River. The results of the discussion should be provided to the Municipality, and included as correspondence within the EIS as warranted.	We will ensure the habitat enhancement design incorporates all designed elements presented within the EIS. This will be provided in a revised EIS.
		Phase One Environment Site Assessment	
		Section 1.0/2.0	
		Section 1.0 of the Phase I ESA notes that the work was completed for due diligence purposes. Section 2.0 of the report indicates that the scope of Phase I ESA was generally in accordance with requirements of CSA Standard Z768-01 (R2022). The consultant should provide information with respect to the suitability of using CSA standards as opposed to completing the Phase I ESA and overall site requirements in consideration of O.Reg. 153/04 – Records of Site Condition.	Premier was retained by Polocorp Inc. to complete a Phase I ESA at the subject property for due diligence purposes. The industry standard for completing Phase I ESAs for due diligence purposes is (CAN/CSA) Standard Z768-01 (R2022). If future plans for the property include development to a more sensitive land use, an O. Reg 153/04 Phase One ESA at minimum would be required to support filing for a Record of Site Condition (RSC).

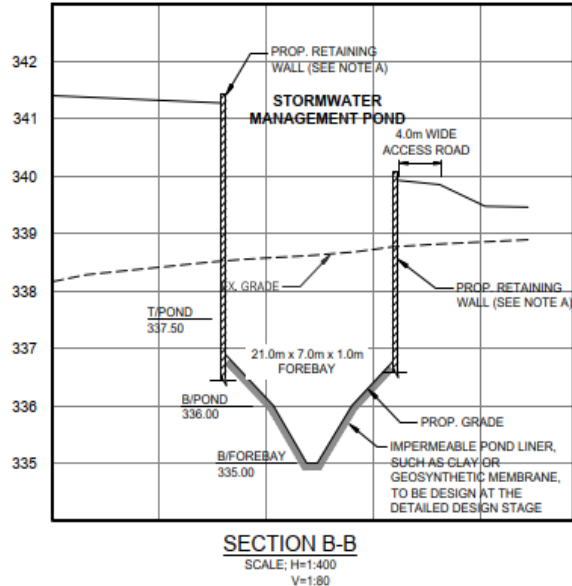
Staff Contact	Agency		Response
		Based on information provided in Section 6.2 of the report, it appears as though portions of the property are being used in part for commercial uses by tenants (Mega Cone Creamery and TAS Trucking). The report would benefit from additional information on the building / tenant arrangement, and a determination of the property use as defined in O.Reg. 153/04.	In 2020, Mega Cone Creamery entered into a 5-years lease agreement with the previous property owner to store two ice cream trucks and ice cream in freezers in Site Building A. Mega Cone Creamery and the current owner have agreed to extend the lease on a month-to-month basis while Mega Cone Creamery looks for alternate space. In 2020, TAS Trucking entered into a lease agreement with the previous property owner to store dump truck / snowplows at the subject property. Vehicles were stored inside Site Building A and exterior to the south elevation of Site Building A. As of August 2025, TAS no longer leases the subject property. Both tenants used vehicle bays in Site Building A to store vehicles and perform light maintenance. Based on review of the tenant spaces at the time of the Phase I ESA, these activities were not expected to result in subsurface contamination at the subject property, and a Phase II ESA was not required.
		Should the property be determined to be of commercial usage, the consultant should provide information with respect to the requirements of O.Reg. 153/04, and the transition of property usage to a more sensitive land use such as residential in this case. A statement on whether or not reporting / filing to satisfy a Record of Site Condition is required for the proposed development should be included.	If the subject property is determined to be of commercial use, and the intended future property use is residential, the requirement to file an RSC would be triggered in accordance with O. Reg 153/04, Based on the attached Opinion Letter prepared by Up Consulting, dated November 13, 2025, the property is considered agricultural use. Residential development would not trigger the requirement to file an RSC
		If it is determined that the requirements of O.Reg. 153/04 apply to this project, the consultant / design team should provide a plan to the Municipality with respect to how the requirements will be achieved. As a result of this further review, the consultant should also update with any recommendations for Phase II intrusive investigations if these are deemed necessary based on alternative regulatory requirements (i.e. O.Reg. 153/04).	N/A
		Section 4.2	
		Section 4.2 of the Phase I ESA notes that at the time of report submission the city directories search had not yet been received. It is noted that if the results of this search alter the conclusions of the report that the Client would be notified in writing. At the time of review, it was unclear if the search results were received by the Consultant or not. If received, a brief summary / statement of the search results should be provided to confirm that they do not alter the conclusions of the report or the report should be updated as appropriate.	The city directory search results were received on December 6, 2023. The only results received were for the Calvary United Church located at 48 Hawkesville Road for the years, 2012, 2017 and 2021. These results do not alter the conclusions of the Phase I ESA.
		Section 4.3	
		Section 4.3 of the Phase I ESA provides a summary of the historical aerial photographs collected as part of the records review. The summary notes predominantly agricultural use within the study area; however, does not recognize the presence of a railway line along the western edge of the subject property. While it is understood that the Phase I ESA has been prepared to meet the requirements of CSA Standard Z768-01 (R2022) and not to meet O.Reg. 153/04 – Records of Site Condition, railway yards, tracks, and spurs are considered a potentially contaminating activity within O.Reg. 153/04. As such, a discussion of the presence of this railway line should be incorporated in the report along with an evaluation as whether or not the feature represents an area of potential environmental concern.	If an O. Reg. 153/04 compliant Phase One ESA was the mandate, the railway line along the west property boundary would be identified as an off-site potentially contaminating activity (PCA). Based on the PCA being located in a down- to cross-gradient direction of the subject property with respect to groundwater flow direction, the railway line PCA may not result in an area of potential environmental concern (APEC) at the subject property

Staff Contact	Agency		Response
		Section 4.5.3	
		Section 4.5.3 of the Phase I ESA notes that at the time of report submission a response from Grand River Conservation Authority had not yet been received. It is noted that the Consultant has indicated that if the results of this response alter the conclusions of the report that the Client would be notified in writing; however, it is unclear if a response was received by the Consultant or not. A brief summary / statement of the response should be provided regarding the status of this correspondence, and any implications with respect to the report conclusions provided.	The GRCA response was received on February 9, 2024. The response did not include information that was not already discussed in the Phase I ESA narrative. The GRCA response does not alter the conclusions of the Phase I ESA.
		Section 6.1	
		Section 6.1 of the Phase I ESA indicates that an interview was completed with the Site representative on November 20, 2023; however, the report does not include a summary of this interview. It is anticipated that the results of the interview have been incorporated in the report; however, a section summarizing the results of the interview should be included in the report for documentation purposes and to ensure consistency with Appendix C of CSA Standard Z768-01 (R2022).	The results of the interview were incorporated into the report. The interview was conducted with Mike Puopolo, the property owner.
		Section 6.2	
		Section 6.2 of the Phase I ESA indicates that Building A is currently used for commercial purposes. Per CSA Standard Z768-01 (R2022), for commercial properties, company records shall be examined. The Standard notes the following as useful documents; site plans, building plans, permit records; production and maintenance records; asbestos surveys; site utility drawings; emergency response or contingency plans; spill reporting plans and records; inventories of chemicals and their usage; material safety data sheets; environmental monitoring data; waste management records; inventory of underground and above ground storage tanks; environmental audit reports; and, prior relevant reports and studies. Based on a review of the Phase I ESA it appears that the Consultant gained some related information from the site representative; however, it is not clear if any site records from the commercial entities were reviewed. The Consultant should clarify if any such records were made available and / or reviewed.	There are no company records for the tenants as they use the space for storage only. There is no advertising, exchange of commercial goods, public access, city directories, or ERIS database results for these tenants.
		Section 6.2 would also benefit from an expanded description of light vehicle maintenance for clarity with respect to the determination of no areas of potential environmental concern.	The light vehicle maintenance completed by the tenants in Site Building A consisted of routine maintenance. There were no records of waste generation, fuel storage, chemical storage, or spills.
		Per Table 1 of O.Reg. 153/04, the report is to include details of cooling systems at the subject property. The report currently does not provide any information related to cooling systems on the subject property and should be updated to include this information.	There are no air conditioners present at the subject property. Based on age, the refrigerators used by Mega Cone Creamery are not expected to contain ozone depleting substances (ODS), although this has not been confirmed. If the refrigerators are serviced, or removed during maintenance, it is recommended the units be inspected by qualified personnel and the presence or absence of ODS confirmed.

Staff Contact	Agency		Response
			In summary, at the time the Phase I ESA was completed in December 2023, the subject property was primarily used for agricultural purposes with storage space in Site Building A leased to two commercial tenants that complete their business off-site. The tenants have leased space at the subject property since 2020. There was no advertising, exchange of commercial goods or public access to the subject property. There were also no city directories, or any other records available related to these tenants on the subject property. At the time of the site inspection the tenant activities were not expected to result in subsurface contamination and therefore a Phase II ESA was not recommended. Based on the attached Opinion Letter prepared by Up Consulting, dated November 18, 2025, the subject property is considered agricultural use. Agricultural is a land use classification that is considered more sensitive than the proposed residential use under O. Reg 153/04, as amended. The proposed residential development of the subject property does not trigger the requirement to file an RSC for the site.
GRCA			
Angela Wang Resource Planner awang@grandriver.ca 519-621-2763 x2270	GRCA	GRCA has reviewed this application under the Mandatory Programs and Services Regulation (Ontario Regulation 686/21), including acting on behalf of the Province regarding natural hazards identified in Section 5.2 of the Provincial Planning Statement (PPS, 2024), as a regulatory authority under Ontario Regulation 41/24 and as a public body under the Planning Act as per our CA Board approved policies. Information currently available at this office indicates that the subject property contains wetland, floodplain, slope erosion and a tributary of the Conestogo River. Additionally, the property contains an offline pond, an associated watercourse and wetland, as well as slope erosion. As such, a large portion of the subject property is regulated by the GRCA under Ontario Regulation 41/24. Any new development/site alteration within the regulated area will require a permit from the GRCA. A copy of our resource mapping is attached for your reference. GRCA previously provided comments on the associated pre-consultation application, dated July 18, 2023, requesting revisions to the concept plan and additional studies to be completed to support the proposed development. Based on our review of the current submission, we offer the following comments to be addressed in a future resubmission. Please provide a comment response matrix indicating how each comment has been addressed.	Noted.
		Stormwater Management Report and Modelling	
		1. Please provide a detailed breakdown of how the impervious area for Catchment Area 100 was determined to be 20%. Our review of Figure No. 4 indicates that the impervious area is below 20%, which may require a different modelling approach (i.e., 'NasHyd' instead of 'StanHyd').	As requested, the impervious area of Catchment 100 has been reviewed further and determined to be 14%. As a result of this change, the NasHyd modelling approach has been used. A figure showing the imperviousness calculation for Catchment 100 has been included in the appendix of the revised Functional Servicing and Stormwater Management Report (GEI Consultants Canada Ltd., December 2025).
		2. A portion of the single-detached dwellings within Catchment Area 2000 is conveyed uncontrolled to the river. Consider exploring the opportunity to convey all roof water to the north. Additionally, it should be determined whether modelling this portion of the single-detached dwellings as a separate catchment would yield a more precise hydraulic representation, and consequently, more accurate modelling results.	As noted in the updated post-development drianage area plan, rooftops of the single-detached dwellings are proposed to be directed to Street A, while the rear-yards are directed, uncontrolled, to the Conestogo River.
		3. There is a discrepancy between Table 5-2 and Figures 4 and 5 in the SWM Report concerning the existing and proposed drainage areas. Please correct this.	The table and figures within the revised Functional Servicing and Stormwater Management Report (GEI Consultants Canada Ltd., December 2025) have been updated to ensure consistency throught the report and modelling files.

Staff Contact	Agency		Response
		4. The drainage area for Catchments 4000, 3000 and 1000 in the VO6 model does not match SWM Report Table 5-2. Please revise accordingly.	The table and figures within the revised Functional Servicing and Stormwater Management Report (GEI Consultants Canada Ltd., December 2025) have been updated to ensure consistency through the report and modelling files.
		5. The SCS Curve Number provided in Table 5-2 of the SWM Report does not match the VO6 modelling and Appendix E.	The table and figures within the revised Functional Servicing and Stormwater Management Report (GEI Consultants Canada Ltd., December 2025) have been updated to ensure consistency through the report and modelling files.
		6. Confirm if the post-development Regional Storms can be safely conveyed to the proposed SWM Facility without causing flooding.	The Regional storm event can be safely conveyed through the proposed stormwater management facility without causing flooding.
		7. Correct the following warning message within the model: "WARNING: STORAGE COEFF. IS SMALLER THAN TIME STEP!"	The timestep has been reduced to 1-minute to resolve this warning message. Some model runs still have this warning message, however the time-step was not further reduced as per the Visual Otthymo manual: "Do not reduce DT less than 1.0. This warning message can be safely ignored when DT is set to 1.0."
		8. Note that the total precipitation during the Regional Storm is 285 mm. Revise accordingly.	The regional storm input data has been revised to reflect a total precipitation depth of 285mm.
		9. According to the Ministry of Environment, Conservation and Parks (MECP) Stormwater Management Planning and Design Manual, 2003 (DSMP&DM), the 25 mm storm drawdown time should be 24 hours. The SWM Report indicates a drawdown time of 15 hours with the proposed 100 mm orifice, which exceeds the minimum required size of 75 mm. To achieve a 24-hour drawdown time, please revise the orifice size, ensuring it is not below 75 mm.	As requested, the stormwater management design and outlet structure have been revised such that a minimum 24-hour drawdown time is achieved during the 25mm storm event.
		Drawings and General Comments	
		10. Please provide the survey signed by an OLS and confirm the vertical datum used.	Noted, to be addressed in the Draft Plan of Subdivision submission or subsequent Site Plan.
		11. The development limit related to slope and erosion hazards, as determined in the Slope Stability Report (GEI, January 23, 2025), should be plotted on all applicable engineering drawings.	As requested, the top of stable slope and the 6.0m setback from the top of stable slope, have been indicated on the engineering drawings.
		12. The floodplain should be identified on the Draft Plan.	Flood plain limit shown on Draft Plan and FSR
		13. The seasonal high groundwater elevation should be plotted on the SWM pond profiles.	As requested, the seasonally high groundwater elevation has been provided on the section views of the stormwater management facility.
		14. The geotechnical engineer should verify if the deep excavation for the 600 mm sewer (SWM pond outlet) and the proposed sewer and manhole loads will negatively impact slope stability.	Acknowledged, to be completed at the draft plan approval stage.
		15. We acknowledge that riprap has been provided at the 600 mm storm sewer outlet. However, it should be confirmed whether concentrated flows could cause erosion downstream of the proposed riprap.	Erosion control measures downstream of the proposed riprap (such as erosion control blankets) will be reviewed at the draft plan approval stage. Overall, the actual flow velocity for the 100-year design storm outflow is limited to less than 3.5 m/s from the pond outlet pipe.
		16. The potential overflow weir flows over the steep slope could cause erosion concerns. Slope protection measures (appropriate non-structural measures may be acceptable) should be implemented to protect the steep slope from erosion.	Acknowledged, we are following up with Terrafix to determine an appropriate slope protection measure at the weir of the stormwater management facility.
		Water Balance and Infiltration	
		17. A monthly water balance is generally a GRCA requirement for this type of draft plan of condominium application. Please provide the monthly water balance that utilizes the Thornthwaite and Mather method.	As requested, a monthly water balance utilizing the Thornthwaite and Mather method has been provided in the updated Functional Servicing and Stormwater Management Report (GEI Consultants Canada Ltd., December 2025).

Staff Contact	Agency		Response
		18. The SWM Report states the following: “The average hydraulic conductivity of the sandy silt to silt sand till was found to be 1.6 x 10-8 m/s, per the Hydrogeological Study undertaken by GEI.” The Hydrogeological (HG) Study indicates that the hydraulic conductivity in the vicinity of MW 24-01 and MW 24-02 is 1.5 x 10-7 m/s and 1.1 x 10-7 m/s, respectively. GRCA’s review of the Low Impact Development Stormwater Management Planning and Design Guide, Credit Valley Conservation – Toronto and Region Conservation Authority, 2010 (LIDSM&DM) indicates that the above hydraulic conductivity is suitable for infiltration. The hydraulic conductivity at MW 24-06, which is located at the site’s north boundary, is 2.9 x 10-9, suggesting that additional infiltration measures may be required. Please investigate and propose additional infiltration features to maximize infiltration under the post-development conditions.	The Functional Servicing and Stormwater Management Report (GEI Consultants Canada Ltd., December 2025) has been updated to accurately reflect the hydraulic conductivity tests as presented in the Hydrogeological Study. Infiltration galleries have been added to infiltrate rooftop and rearyard runoff where feasible (i.e. where a 1m vertical distance from seasonal high groundwater table can be maintained).
		19. The SWM Report (Section 6, pg. 19) states the following: “There will be some opportunity for infiltration in the rear and side yard swales. During periods of frequent precipitation and/or snow melt, there is potential that water would infiltrate into the ground faster than it could be drained through the deeper strata, causing groundwater levels to rise. As a result, no infiltration facilities are proposed for the site, and the stormwater management will be lined.” This statement is not consistent with the HG study. The HG study states the following: “Therefore, though the pre-development target may not be achievable, it is recommended that some effort be taken to implement ‘Low Impact Development’ structures (i.e., bioswales, infiltration galleries) and best management practices to minimize the change in recharge caused by development.” Based on the above, please investigate and propose additional infiltration features to minimize the change in recharge caused by development.	Low impact development measures, specifically infiltration galleries, have been proposed where feasible, to achieve a post to pre-development water balance.
		20. We acknowledge that groundwater table elevations have been provided. The measurements reflect several months of monitoring rather than seasonal high groundwater elevations. Please confirm whether an updated report with the seasonal high groundwater table will be provided.	At this time, over 18 months of groundwater level data has been collected at the Site. The Hydrogeological Study Report (Version R02, dated December 15, 2025) was updated to include the water level data collected at the Site up to December 2025. Seasonal high groundwater elevations established for the Site based on water level monitoring from May 2024 to December 2025 are presented in Table 3-2 in Section 3.2.
		Erosion and Sediment Control (ESC)	
		21. Given the scale and complexity of this development, the use of heavy-duty silt fence is recommended over a light-duty silt fence.	As requested, heavy duty silt fence has been proposed on the Sediment and Erosion Control Plan (GEI Consultants Canada Ltd., Drawing SEC).
		22. Please provide a comprehensive ESC plan at the detailed design stage that contains several ESC measures (i.e., sediment/silt fence, mud mat, sediment traps, sediment control ponds, swale check dams, silt sack, etc.).	As requested, a more detailed Sediment and Erosion Control Plan will be provided at the detailed design stage.
		23. The proposed monitoring requirement for the ESC measures should include sufficient detail on the frequency of monitoring (e.g., once weekly as well as immediately before and after significant forecast precipitation events).	Monitoring requirements of the sediment and erosion control measures have been provided on the Notes and Details Plan (GEI Consultants Canada Ltd., Drawing ND), specifically note 9 under the Sediment and Erosion Control section.
		Environmental Impact Study	
		24. The wetland limits on site need to be confirmed with GRCA staff, including the limits of the wetland proposed to be removed. The presence or absence of GRCA mapped wetland that the EIS indicates is not a wetland will also need to be confirmed with GRCA staff.	The wetland limits will be confirmed with GRCA in the springtime (tentatively scheduled for May, 2026).
		25. The presence/condition of the regulated watercourse, including its presence within the wetland should also be confirmed.	The presence/condition of the regulated watercourse will be confirmed with GRAC in the springtime (tentatively scheduled for May, 2026).

Staff Contact	Agency		Response
		26. Demonstration of the proposed wetland removal meeting GRCA policy needs to be better established as it appears that there is a watercourse present in the wetland proposed to be removed.	The removal of the wetland has been evaluated in Table 6 of section 3.4.5 in the EIS. Our site work did not characterize the drainage north of the pond as a channel. Therefore, the response to this comment is contingent on the site evaluation with GRCA planned for May of 2026, and any changes in compliance will be further assessed after this site evaluation is complete.
		27. GRCA discourages removals and enclosures of watercourses and only permits such activities in rare circumstances based on a number of considerations. Clear demonstration that the removal or enclosure of the mapped regulated watercourse can meet GRCA policy 8.9.17 must be provided.	Should the onsite feature confirmation characterize the drainage to the feature as a channel, we will provide an update to the EIS addressing GRCA policy 8.9.17.
		Advisory Comments	
		28. There is a serious concern regarding public safety (see below) with the retaining wall being higher than 4 m. This issue should be discussed with the municipality and alternative options should be explored (i.e., a high chain fence with a lock).  SECTION B-B SCALE: H=1:400 V=1:80	Acknowledged, retaining walls have been reduced under each respective option.
		29. Please confirm if the proposed retaining wall will affect the slope stability (e.g., additional load to the slope).	
		The GRCA applies Plan Review Fees for Planning Act applications located within GRCA areas of interest. Consistent with GRCA's 2023-2025 plan review fee schedule, a base fee of \$2,505.00 plus \$1,305 per net hectare (excluding lands outside of the development limit) is required for our review of these applications, to a combined total of \$8,742.90. At the time of application submission, 70% of the combined total, which is \$6,120.03, will be invoiced to the applicant. The remaining 30% will be invoiced prior to the issuance of draft plan approval.	Noted.