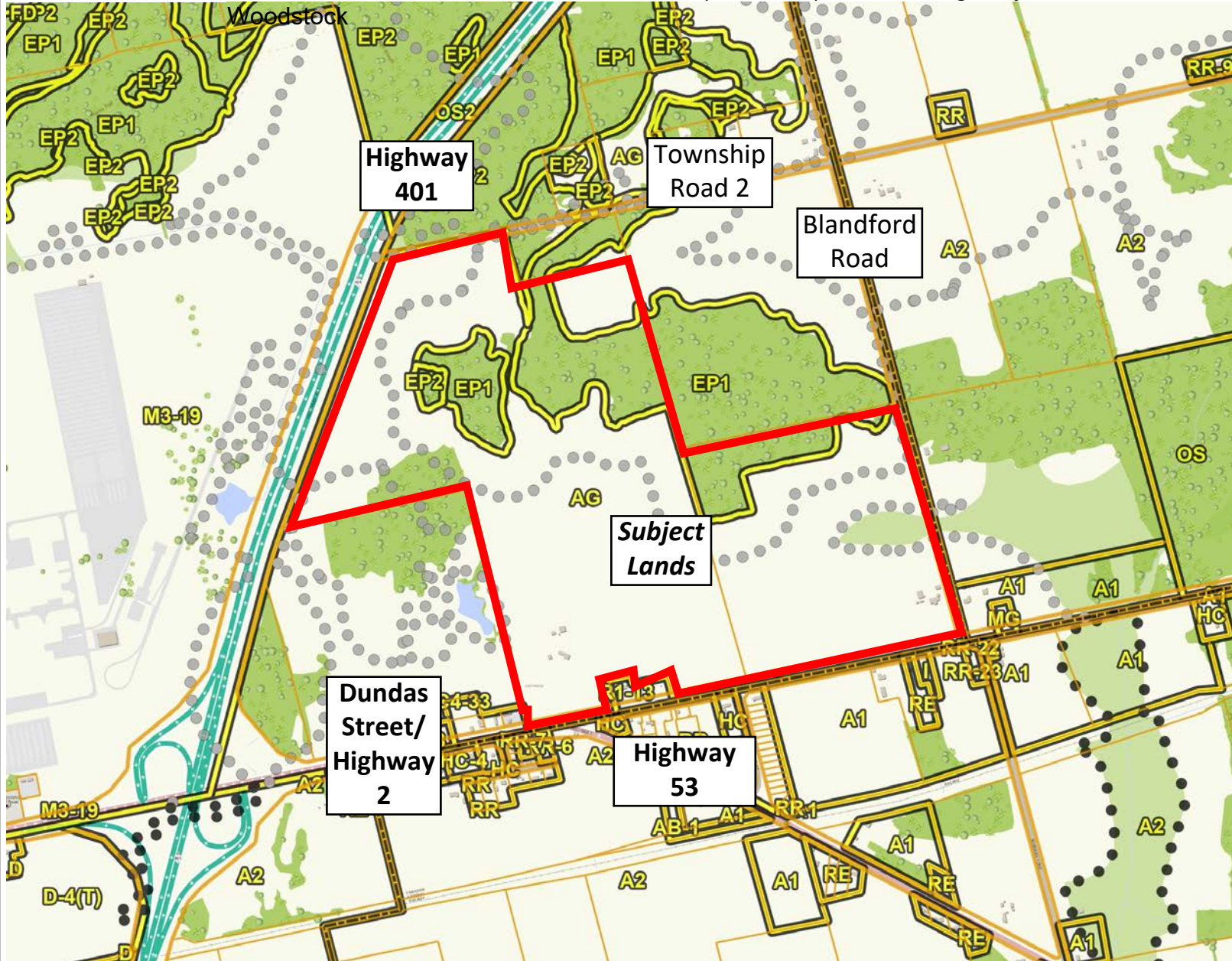




Plate 1: Location Map with Existing Zoning

File Nos: SB 24-02-8 & ZN 8-24-03- City of Woodstock

Part of Lots 7, 8 & 9, Concession 1 (Blandford) - 685761 Highway 2 & 775019 Blandford Road, City of



Legend

- Parcel Lines**
 - Property Boundary
 - Assessment Boundary
 - Unit
 - Road
 - Municipal Boundary
- Zoning Floodlines Regulation Limit**
 - 100 Year Flood Line
 - 30 Metre Setback
 - Conservation Authority Regulation Limit
 - Regulatory Flood And Fill Lines
- Land Use Zoning (Displays 1:16000 to 1:500)

Notes



0 409 818 Meters

NAD_1983_UTM_Zone_17N



This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. This is not a plan of survey

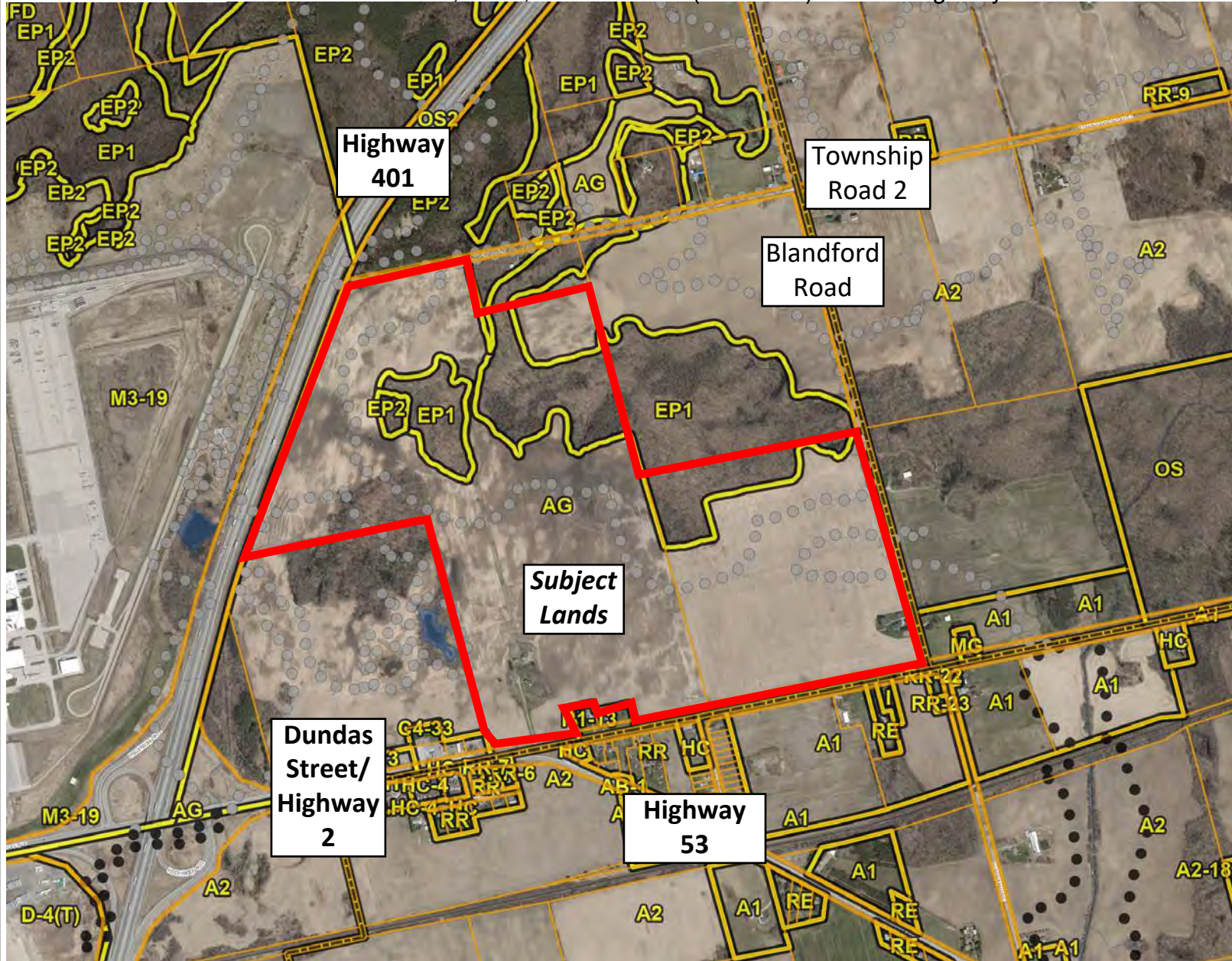
February 20, 2024



Plate 2: 2020 Aerial Map

File Nos: SB 24-02-8 & ZN 8-24-03- City of Woodstock

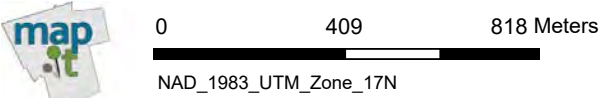
Part of Lots 7, 8 & 9, Concession 1 (Blandford)-685761 Highway 2 & 775019 Blandford Road, City of Woodstock



Legend

- Parcel Lines**
 - Property Boundary
 - Assessment Boundary
 - Unit
 - Road
 - Municipal Boundary
- Zoning Floodlines Regulation Limit**
 - 100 Year Flood Line
 - 30 Metre Setback
 - Conservation Authority Regulation Limit
 - Regulatory Flood And Fill Lines
- Land Use Zoning (Displays 1:16000 to 1:500)**

Notes



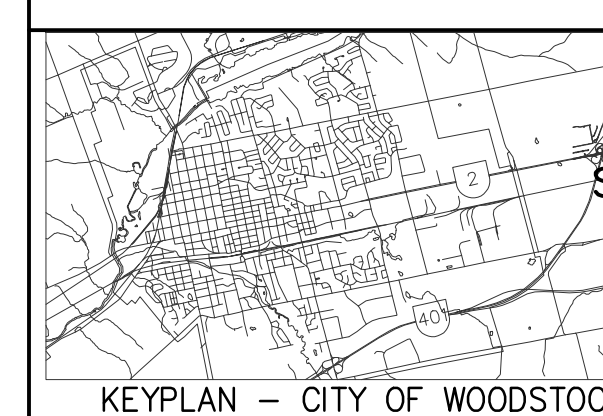
This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. This is not a plan of survey

February 20, 2024



London, Ontario 519.873.0510

THE PLANES AND SPECIFICATIONS OF THIS DRAWING ARE SUBJECT TO THE TERMS AND CONDITIONS OF THE AGREEMENT BETWEEN THE CLIENT AND AECOM, WHICH IS INCORPORATED BY REFERENCE INTO THIS DRAWING. THE CLIENT'S RESPONSIBILITY IS TO OBTAIN ALL NECESSARY PERMITS AND APPROVALS FROM THE APPROPRIATE AUTHORITIES. AECOM'S RESPONSIBILITY IS LIMITED TO THE DESIGN AND ENGINEERING SERVICES PROVIDED HEREIN. NO WARRANTIES ARE MADE BY AECOM FOR THE ACCURACY OR COMPLETENESS OF THE INFORMATION PROVIDED HEREIN. ALL MEASUREMENTS MUST BE TAKEN FROM THE ORIGINAL RECORD DRAWINGS.



LAND USE SCHEDULE

LAND USE	BLOCKS	AREA	%
SWIM FACILITY BLOCK	1	6.8364 Ha	5.0%
SANITARY PUMPING STATION BLOCK	2	0.1658 Ha	0.1%
INDUSTRIAL DEVELOPMENT BLOCK	3	5.8181 Ha	4.3%
INDUSTRIAL DEVELOPMENT BLOCK	4	5.7205 Ha	4.2%
INDUSTRIAL DEVELOPMENT BLOCK	5	25.2533 Ha	18.6%
INDUSTRIAL DEVELOPMENT BLOCK	6	10.3374 Ha	7.6%
INDUSTRIAL DEVELOPMENT BLOCK	7	8.8153 Ha	6.5%
INDUSTRIAL DEVELOPMENT BLOCK	8	9.3190 Ha	6.9%
INDUSTRIAL DEVELOPMENT BLOCK	9	2.9766 Ha	2.2%
INDUSTRIAL DEVELOPMENT BLOCK	10	13.8372 Ha	10.2%
INDUSTRIAL DEVELOPMENT BLOCK	11	6.0760 Ha	4.5%
3.0m WIDENING BLOCK	12	0.1403 Ha	0.1%
3.0m WIDENING BLOCK	13	0.0498 Ha	0.0%
0.3m RESERVE BLOCK	14	0.0035 Ha	0.0%
0.3m RESERVE BLOCK	15	0.0051 Ha	0.0%
0.3m RESERVE BLOCK	16	0.0100 Ha	0.0%
0.3m RESERVE BLOCK	17	0.0134 Ha	0.0%
0.3m RESERVE BLOCK	18	0.0014 Ha	0.0%
0.3m RESERVE BLOCK	19	0.0050 Ha	0.0%
0.3m RESERVE BLOCK	20	0.0006 Ha	0.0%
0.3m RESERVE BLOCK	21	0.0121 Ha	0.0%
0.3m RESERVE BLOCK	22	0.0006 Ha	0.0%
MTO SETBACK	23	1.0280 Ha	0.8%
NATURAL HERITAGE FEATURE	24	15.6810 Ha	11.5%
NATURAL HERITAGE FEATURE	25	3.1583 Ha	2.3%
NATURAL HERITAGE FEATURE	26	6.6409 Ha	4.9%
FUTURE DEVELOPMENT	27	4.3064 Ha	3.2%
TOTAL SITE AREA		135.7727 Ha	

SECTION 51 - PLANNING ACT REGULATIONS
 A AS SHOWN ON DRAFT PLAN
 B AS SHOWN ON DRAFT PLAN
 C AS SHOWN ON DRAFT PLAN
 D AS SHOWN ON DRAFT PLAN
 E AS SHOWN ON DRAFT PLAN
 F AS SHOWN ON DRAFT PLAN
 G AS SHOWN ON DRAFT PLAN
 H AS SHOWN ON DRAFT PLAN
 I AS SHOWN ON DRAFT PLAN
 J AS SHOWN ON DRAFT PLAN
 K AS SHOWN ON DRAFT PLAN
 L AS SHOWN ON DRAFT PLAN

PLAN OF SURVEY COMPLETED BY ARCHIBALD GRAY & MCKAY LTD. IN APRIL 2022.
 PLAN OF SURVEY PART OF LOTS 7, 8 & 9, CONCESSION 1, TOWNSHIP OF BLANDFORD, COUNTY OF OXFORD.

SURVEYOR'S CERTIFICATE
 I HEREBY CERTIFY THAT THE BOUNDARY OF THE LANDS TO BE SUBDIVIDED AS SHOWN ON THIS PLAN AND THEIR RELATIONSHIP TO THE ADJACENT LANDS ARE ACCURATELY AND CORRECTLY SHOWN.

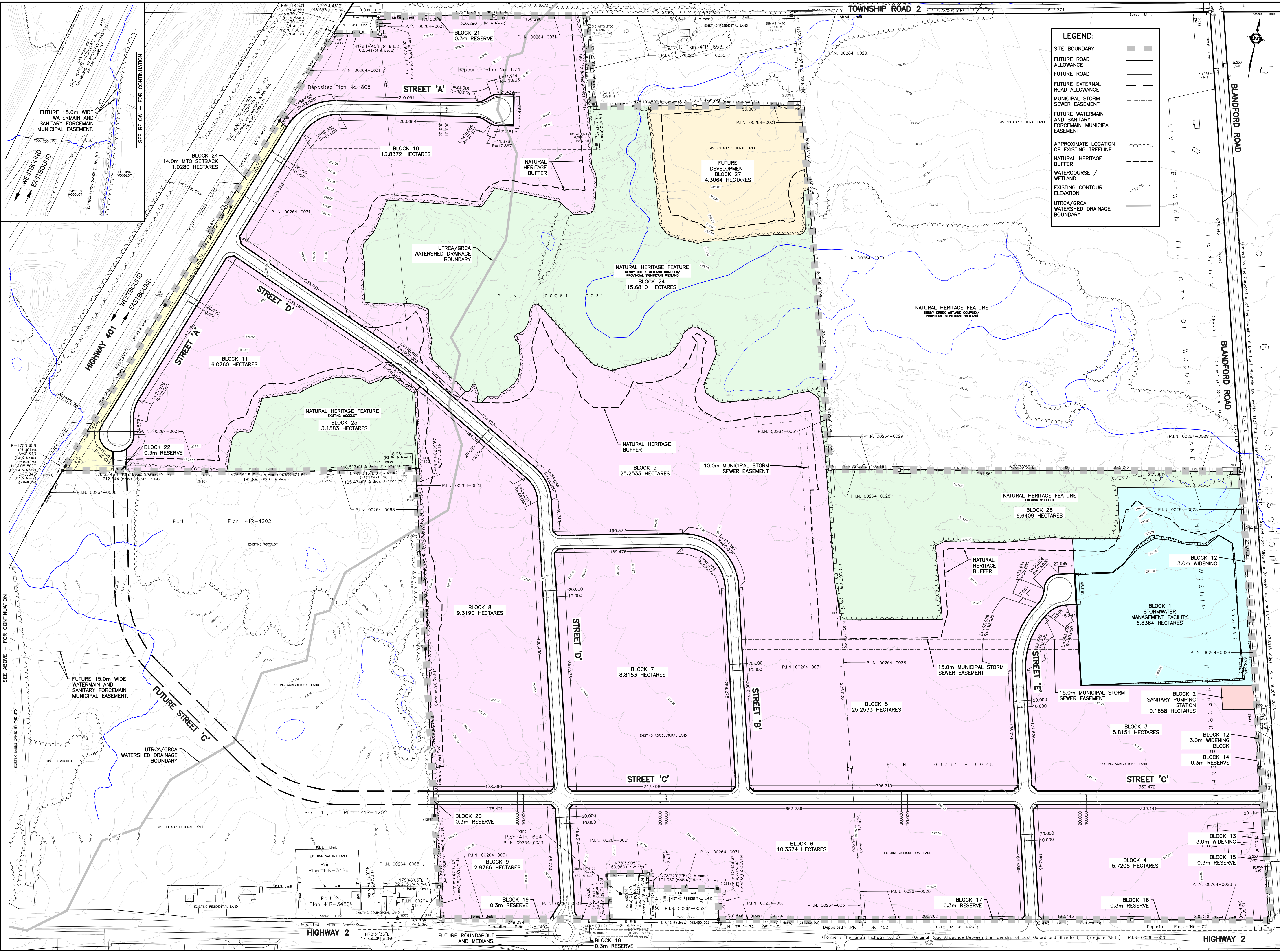
LONDON, ONTARIO JASON WELAND ONTARIO LAND SURVEYOR

NORTHEAST WOODSTOCK INDUSTRIAL PARK PLANNING & SERVICING STUDY
 DRAFT PLAN OF SUBDIVISION
 WOODSTOCK, ONTARIO

No.	REVISIONS	DATE



DRAWN BY: KM/JP PROJECT No: 60632016
 DESIGNED BY: JJK DRAWING No:
 CHECKED BY: JJK SCAN No:
 APPROVED BY: DATE: MARCH, 2023
 SCALE: 1:2500 SHEET OF



LEGEND:

- SITE BOUNDARY
- FUTURE ROAD ALLOWANCE
- FUTURE ROAD
- FUTURE EXTERNAL ROAD ALLOWANCE
- MUNICIPAL STORM SEWER EASEMENT
- FUTURE WATERMAIN AND SANITARY FOREMANS MUNICIPAL EASEMENT
- APPROXIMATE LOCATION OF EXISTING TREELINE
- NATURAL HERITAGE BUFFER
- WATERCOURSE / WETLAND
- EXISTING CONTOUR ELEVATION
- UTRCA/GRCA WATERSHED DRAINAGE BOUNDARY

Plate 3: Draft Plan of Subdivision
 File Nos: SB 24-02-8 & ZN 8-24-03- City of Woodstock
 Part of Lots 7, 8 & 9, Concession 1 (Blandford)-685761 Highway 2 & 775019 Blandford Road, City of Woodstock

Andrew Baker
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Lee English
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Borden Ladner Gervais LLP
Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto ON M5H 4E3
Canada
T 416-367-6000
F 416-367-6749
blg.com



File No. 040292.000001

May 13, 2024

DELIVERED BY EMAIL
(skatikapalli@cityofwoodstock.ca)

City Council
Corporation of the City of Woodstock
500 Dundas Street
PO Box 1539
Woodstock ON N4S 0A7

Dear Mayor Acchione and Members of Council:

Re: City Council Meeting – May 16, 2024 – Item 9.a
685761 Highway 2 & 775019 Blandford Road, City of Woodstock
City of Woodstock Applications for Draft Plan of Subdivision and Zoning By-law
Amendment
City File Nos. SB24-02-8 and ZN8-24-03
Comment Letter - 2729902 Ontario Inc.

We are counsel to 2729902 Ontario Inc. (“**2729902**”), the owner of lands municipally known as 685691 Highway 2, City of Woodstock (“**Gill Lands**”). The Gill Lands are 36.37ha (89.89ac) in size and immediately adjacent to the lands subject to the above-referenced *Planning Act* applications.

The City of Woodstock (“**City**”) is hastily advancing applications to amend the City of Woodstock Zoning By-law 8626-10 (“**City ZBL**”) (“**ZBA Application**”) and for draft plan of subdivision (“**DPOS Application**”, collectively the “**City Applications**”) for the lands municipally known as 685761 Highway 2 and 775019 Blandford Road in the City of Woodstock (“**Subject Lands**”).

We write to request that City Council defer consideration of this item. Adopting the recommendations in the staff report regarding the City Applications dated May 16, 2024 (“**Staff Report**”) would adversely impact the public process prescribed by the *Planning Act* and the provincial policy direction to coordinate land use planning, including servicing and transportation.

For example, the City will hold the public meeting later today (May 13, 2024) **after** City staff prepared the report recommending approval in principle of the City’s Application. This “tick the box” approach to consultation and public participation undermines the merits of the City’s plans to redevelop the Subject Lands with industrial and service commercial uses.

2729902 has worked cooperatively with the City to accomplish the City's interests, as well as advancing the development of the Gill Lands concurrently with the City's vision for the Northeast Industrial Park. However, we have significant concerns with the manner in which the City has advanced the City's Applications. These concerns are amplified given the recent decision to advance and approve OPA 268 without providing notice to 2729902, despite the City's knowledge of the implications of that planning instrument on the Gill Lands. Our client has previously raised these concerns in past correspondence to the City in July 2022 and January 2023.

We therefore request that City Council defer this matter until such time that the City, County and our client have had an opportunity to have a meaningful discussion regarding the City's Applications.

The Gill Lands and Development Applications

The Gill Lands are immediately west of the Subject Lands and are directly impacted by the City's Applications. As the City has known for years, 2729902 plans to redevelop the Gill Lands with 'service/highway commercial' uses along the Highway 2 frontage and 'industrial' uses (specifically, but not limited to a transportation/trucking depot, warehousing and other typical industrial uses) on the interior of the property, inclusive of the Highway 401 frontage.

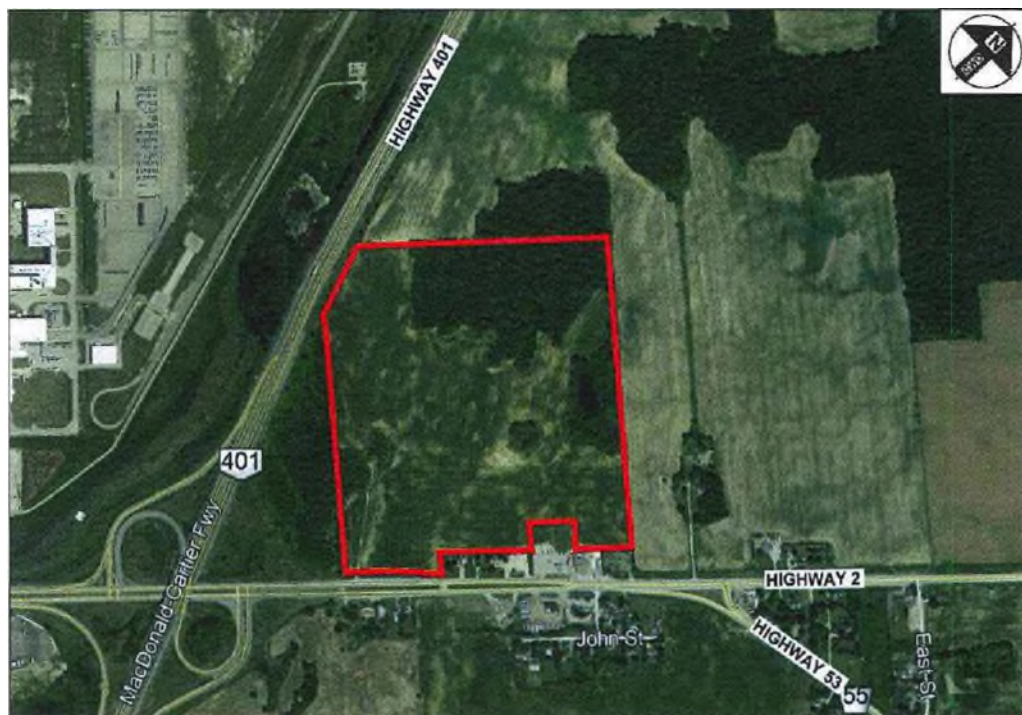


Figure 1: Gill Lands

On September 3, 2021, 2729902 requested a pre-consultation meeting with City staff regarding a proposal to redevelop the Gill Lands for industrial and service commercial purposes. 2729902 advised the City as early as January 2021 that potential future development of the Gill Lands may include a trucking centre with warehouse-loading docks and offices.

2729902 filed applications for official plan amendment, zoning by-law amendment and draft plan of subdivision approval for the Gill Lands in October, 2023 bearing City File Nos. OP 23-11-8, SB 23-06-8 & ZN 8-23-1). (“Gill Applications”). The County deemed the Gill Applications complete on March 19, 2024.

The City’s Applications and 2729902’s proposed redevelopment of the Gill Lands reflect similar land uses and both require coordination regarding servicing and transportation. In particular, 2729902 has been working with the City’s consulting team to advance the servicing of the Northeast Industrial Park lands, which includes plans for a 15m wide easement on the Gill Lands to facilitate the preferred watermain and sanitary forcemain design. Matters related to servicing and land acquisition have not yet been resolved and the City’s Applications are premature until such time as these critical infrastructure matters are addressed.

2729902’s applications to facilitate the redevelopment of the Gill Lands were filed in October, 2023 and have not yet advanced to a public meeting (despite repeated requests from 2729902). On the contrary, City’s Applications were deemed complete in February, 2024 and have already been slated for public meeting and are presented to City Council for approval and/or endorsement.

The City has refused to advance the Gill Applications to a public meeting on the basis that Ministry of Transportation (“MTO”) comments have not been received. We understand that the City has not yet received comments from the MTO regarding the City Applications. If the City has received comments from the MTO, we kindly request a complete copy of the MTO’s comments regarding the City’s Applications.

This condition (i.e. the need for MTO comments) applies equally to the City’s Applications as it does to the Gill Applications. There is no basis for the City’s discrimination as between our client’s applications and the City’s Applications. This is especially so given the City’s Applications rely on internal street networks and servicing connections (including easements) on and under the Gill Lands and integration with Highway 401 is a relevant factor for both applications.

The City’s approach – advancing its own applications, while delaying 2729902’s related applications for adjacent and directly impacted lands – is unfair, prejudicial and does not reflect the coordinated approach to land use and infrastructure planning mandated by provincial policy.

Preliminary Comments on the City’s Applications

The City has failed to provide sufficient time or information for 2729902 to provide comments on the City’s Applications. The proposed zoning by-law amendment itself has not yet been made publicly available and was provided to our client on May 10, 2024 and only upon request (despite the long-history of our client’s involvement in the planning processes leading to the City’s Applications). We have not had sufficient time to review the instruments themselves, let alone the studies, information or materials that inform the City’s Applications.

Notwithstanding the limited and insufficient time for review, we offer the following comments on the Staff Report and City's Applications:

- 2729902 does not support the Special Prestige Industrial Holding Zone (M1-12(H)), which corresponds to Blocks 10 and 11 on the DPOS Application. These blocks back onto Highway 401 and are designated as "Business Park" designation in the City's Official Plan (as amended by OPA 268) which does not permit predominantly trucking operations.
- The City's Applications anticipate sanitary and water services infrastructure being extended from the west, across Highway 401 and the Gill Lands. The City has not yet secured the necessary property interests to advance its servicing plan. 2729902's willingness to consensually convey the necessary property interests to the City (or County as the case may be) is contingent on the City's response to the Gill Applications.
- The DPOS Application anticipates a 4.3 hectare, land-locked parcel within the Subject Lands. The City and County have advised 2729902 that it is unable to have a landlocked parcel on the Gill Lands and identified this an issue preventing the Gill Applications from being advanced to a public meeting. The City (and County) must treat all landowners equally and cannot afford special treatment to the City on the grounds that it is the owner of the lands subject to the City's Applications.
- The Staff Report fails to adequately explain the impact of the City's Applications on the Gill Lands and understates the importance of the Gill Lands in terms of realizing the City's vision for the Subject Lands. For example, the description of the surrounding lands on page 3 of the Staff Report is silent regarding the Gill Lands, the ongoing applications for their redevelopment and the impacts of the City's Applications on those lands. Our client has provided the City with numerous updates (both in meetings and in correspondence) regarding its preferred plans for the Gill Lands and requests that those land uses be properly considered as part of the City's Applications.
- The Prestige Industrial zone does not reflect the Gill Applications' proposal to redevelop the portion of its lands north of Highway 2.
- The Staff Report does not include a copy of the proposed zoning by-law amendment (we requested and received a copy on May 10, 2024). Concerns regarding public notice and input aside, City Council cannot be asked to approve a by-law it has not seen.
- The Staff Report includes proposed conditions of draft plan approval. Draft plan of subdivision conditions are important matters that may have off-site implications and require sufficient time for review and comment (which was not afforded to 2729902). Given the impacts of the City's Applications on the Gill Lands (including reliance on the Gill Lands for servicing and transportation connections), 2729902 requests additional time to consider the draft plan conditions. The draft plan conditions do not address any matters related to coordinating development with 2729902.

Clarity Needed Regarding ZBA Recommendation

The Staff Report recommends that City Council “approve in principle” the ZBA Application. The effect of a decision to adopt this recommendation is unclear.

The April 29, 2024 Notice of Public Meeting states:

PLEASE NOTE: The Council of the City of Woodstock will make a recommendation to County Council regarding the Draft Plan of Subdivision and Zone Change applications. The applications will be considered for decision by County Council at a regular meeting as noted below/on the reverse of this page.

This statement implies that the County Council will make a decision regarding the ZBA Application. That is contrary to the *Planning Act* – it is the City, not the County, that can enact and amend zoning by-laws. Subsection 34(1) of the *Planning Act* is clear that “[z]oning by-laws may be passed by the councils of local municipalities”.

While we understand Oxford County provides planning support to the City, it is City Council that must make a decision regarding the ZBA Application. The *Planning Act* does not provide for “approval in principle” of an amendment to the City’s ZBL.

We ask that City Council clarify what is meant by “approval in principle” as it relates to City staff’s recommendation regarding the ZBA Application and amend the recommendation to either:

1. approve the ZBA Application (giving rise to rights of appeal); or,
2. receive the draft zoning by-law amendment for information and direct City staff to provide the draft zoning by-law amendment (together with all related information and materials) to the County and any persons who request a copy of the ZBA Application materials.

Conclusion

The manner in which the City has advanced the City’s Applications does not reflect coordinated land use planning in a manner that allows for meaningful public input, especially from affected landowners, including 2729902.

We encourage the City to embrace a collaborative approach to the redevelopment of this area by deferring this item to a later meeting of Council and directing City staff to meet with our client and its consultants to discuss the City’s Applications and the Gill Applications. These applications should advance in tandem, or at a minimum, be coordinated. Rushing to advance the applications for the Subject Lands, while ignoring the implications on the Gill Lands, will lead to increased time, cost and complexity in redeveloping this area in a manner envisioned by the City.

We request to be notified of this and any decision of City Council regarding the City’s Applications.

Yours truly,

BORDEN LADNER GERVAIS LLP

A handwritten signature in blue ink, appearing to read "Lee English".

Lee English

Cc Client
Andrew Walker, GWD, awalker@gwdplanners.com
Michael Gagnon, GWD, mgagnon@gwdplanners.com
Michelle Harris, GWD, mharris@gwdplanners.com
Eric Gilbert, egilbert@oxfordcounty.ca

From: Eric Gilbert
Sent: May 14, 2024 4:49 PM
To: Planning
Subject: FW: BLG Letter- SB 24-02-8

Eric Gilbert, MCIP RPP
Manager of Development Planning | Community Planning
Oxford County

From: Eric Gilbert
Sent: Tuesday, May 14, 2024 4:13 PM
To: Jerry Acchione <jacchione@cityofwoodstock.ca>; Deb Tait <dtait@cityofwoodstock.ca>; Liz Wismer-Van Meer <lwismervanmeer@cityofwoodstock.ca>; Mark Schadenberg <mschadenberg@cityofwoodstock.ca>; Connie Lauder <clauder@cityofwoodstock.ca>; Kate Leatherbarrow <kleatherbarrow@cityofwoodstock.ca>; Bernia Martin <bmartin@cityofwoodstock.ca>
Cc: David Creery <dcreery@cityofwoodstock.ca>; Amy Humphries <ahumphries@cityofwoodstock.ca>; Harold deHaan <hdehaan@cityofwoodstock.ca>
Subject: BLG Letter- SB 24-02-8

Good Afternoon Council,

In response to some questions and concerns that were received in response to the letter received on Monday from Lee English, representing the abutting lands to the east (the Gill Lands), respecting the City's industrial subdivision (SB 24-02-8 & ZN 8-24-03), staff offer the following comments.

The planning for the industrial park has spanned over 4 years, since 2020. The lands were part of the Southeast Woodstock Secondary Plan, which involved investigating servicing options to extend water and sanitary sewer services across Highway 401 to serve the lands that are designated for industrial purposes on the east side of Highway 401. As part of that integrated Environmental Assessment and Secondary Plan, staff have:

- Met with the owner, his planning and consulting team many times over the past 4 years and as recently as April 26, 2024;
- Met with MTO, Toyota, Grand River Conservation Authority, Upper Thames River Conservation Authority, Oxford County, First Nations and abutting landowners.
- Shared studies, engineering designs, surveys with the owner and his consultant to help prepare their design;
- There have been Public Notices, two Public Information Centers and City Staff have been available for questions anytime throughout the past 4 years.

The letter accuses the City of treating it's application differently than the Gill application, this is false.

- The City's application follows the approved Official Plan designations as contained in the approved Southeast Woodstock Secondary Plan.
- The City's subdivision application does not propose any new accesses onto Highway 2 within the MTO permit control area. The Gill development is proposing a connection to Dundas within the MTO control area which is why MTO comments are necessary before proceeding.
- Many of the supporting studies required (Environmental Impact Study, Traffic Study) were completed through the Secondary plan and only required minor updates;

- The subdivision Plan follows the street layout and preferred servicing, drainage options of the secondary plan and EA. As such, there were minimal review comments from circulated agencies.

For the above reasons, the City application was ready to proceed to a public meeting in a relatively quick manner. The City's subdivision plan is only linked to the Gill property by the required servicing easement, otherwise it is able to proceed independently. The Gill lands will need access to a gravity sewer and sanitary pumping station that would be constructed within the City's subdivision lands.

The Gill application was originally submitted in November 2023, and the payment for the peer review of the Environmental Impact Statement was not received until February 2024. Circulation comments were provided to the agent in March 2024, and some of the comments are significant and require a response or modifications to the plan. The primary issue is that the Gill plan proposes direct access to Highway 2 within the MTO access-controlled area where MTO had previously communicated to the City through the Secondary Plan that no access would be permitted. No response to the circulation comments have been received to date.

As the City's plans for its lands are the subject of a comprehensive integrated MCEA and Planning Act process that has been ongoing since mid-2020 and has allowed ample opportunity for public and agency input and feedback which have been considered and address in the submissions, and the City's applications directly implement the approved Official Plan / Secondary Plan land use designations and do not seek to justify any changes to them, the related planning draft plan and re-zoning applications have advanced from submission to public meeting more quickly. Conversely, the Gill applications are being considered for the first time, request changes to the approved land use designations, and have resulted in comments that will take more time to address.

With respect to the comments referencing a lack of notice of the City's applications, as recently as April 26, City staff, Planning Staff, and the City's engineering consultant met with Gill, their planning consultant and engineering team to discuss next steps. At that meeting, City staff offered to defer consideration of the City's application for another month, which Gill declined. Gill was provided notice of complete application by mail of the City's applications on February 26, 2024 & Notice of Public meeting by mail on April 29, 2024. No request for a copy of the planning report or any studies was received prior to the posting of the Planning Meeting Agenda.

The City has been working cooperatively with Gill as the City requires an easement through the Gill property for water and wastewater servicing. For this reason, City staff and their consultants have been very diligent about sharing information and completed work with Gill and his consultants.

BLG has a few comments on page 4 of their letter. In response Staff have the following comments:

- It is not clear why Gill has an objection to the proposed M1-sp zoning on the City's lands in proximity to the 401, the reason for the objection is not clear. The proposed zoning will be on City property and have no impact on the Gill property.
- The city does not need to secure the easements prior to DPOS approval. Easements are generally secured when exact location of utilities is determined through detailed design.
- The landlocked parcel on the city's DPOS is proposed to be zoned "Future Development" which effectively freezes it until access is provided. Also this conforms with the Secondary Plan
- The City is willing to work with the owner but not for the owner. There is no reason why the city should include the owner's development in its applications.
- The need for offsite servicing is why the city approached development through an integrated master plan EA and draft plan of subdivision approach. As mentioned, the city has been in contact with all of the necessary stakeholders, including the owner, multiple times throughout the past 4 years.

A draft zoning by-law amendment was not included with the Planning agenda, however it was included in the background studies and planning justification report that was prepared for the application. Planning staff typically

recommend an approval in principle where the by-law has not been prepared but will be passed at a future date when the subdivision is given draft approval. This is standard practice and not unique to this application.

From the letter, it is stated that Gill's position relates to their willingness to consensually convey the required servicing easements is dependent on the City's response to their Official Plan Amendment, draft plan of subdivision and zone change applications. While the City is willing to work with Gill to develop their property, this does now mean that the city will approve or overlook issues that require resolution.

I hope that this provides clarity on the issues raised in the letter. Please contact Harold de Haan or myself if you have any questions or comments or wish to discuss further.

Regards,

Eric Gilbert, MCIP RPP
Manager of Development Planning | Community Planning
Oxford County
P.O. Box 1614 | 21 Reeve Street
Woodstock ON N4S 7Y3

P: 519 539 0015 ext 3216
E-mail: egilbert@oxfordcounty.ca



"Inspiring a Healthy Environment"

May 6, 2024

County of Oxford Community Planning Office
21 Reeve Street
Woodstock, ON N4S 7Y3

Attention: Eric Gilbert, Manager of Development Planning (via e-mail planning@oxfordcounty.ca)

Re: Draft Plan of Subdivision and Zone Change Applications
File No.: SB 24-02-8 & ZN 8-24-03
Agent: GSP Group Inc. c/o Steve Wever
Owner: The Corporation of the City of Woodstock
685761 Highway 2 & 775019 Blandford Road, City of Woodstock

The Upper Thames River Conservation Authority (UTRCA) has reviewed this application with regard for the policies within the Environmental Planning Policy Manual for the Upper Thames River Conservation Authority (June 2006), Section 28 of the *Conservation Authorities Act*, the *Planning Act*, the Provincial Policy Statement (PPS, 2020), and the Upper Thames River Source Protection Area Assessment Report.

BACKGROUND & PROPOSAL

The subject lands are described as part of lots 7, 8 & 9, Concession 1 (Blandford), now in the City of Woodstock. The lands are located on the north side of Highway 2, west side of Blandford Road, south side of Township Road 2, and are adjacent to the eastern side of Highway 401, and are municipally known as 685761 Highway 2 & 775019 Blandford Road in the City of Woodstock. The subject lands are currently used for agricultural cash crop production with the exception to the natural heritage features which includes part of a Provincially Significant Wetland complex.

The approximately 135.8 ha in area subject lands are currently designated as Business Park, Traditional Industrial, Future Urban Growth and Environmental Protection on Schedule 'W-1' City of Woodstock Land Use Plan of the County of Oxford Official Plan, and zoned 'Agricultural (AG)' and 'Environmental Protection (EP1 & EP2)' in the City of Woodstock Zoning By-law No. 8620-10. The majority of the subject lands are located within the jurisdiction of the Grand River Conservation Authority (GRCA), with an area in the north-west portion of the subject lands located within the jurisdiction of the Upper Thames River Conservation Authority (UTRCA). Each Conservation Authority (GRCA & UTRCA) is submitting their comments for this subdivision under a separate cover.

The purpose of the application for **Draft Plan of Subdivision (file SB24-02-8)** is to create a municipal industrial plan of subdivision consisting of:

- Nine (9) blocks for industrial uses (Blocks 3 to 11) which may be further subdivided;
- Two (2) 3.0 m road widening blocks (Blocks 12 & 13);
- One (1) block for stormwater management (Block 1);
- One (1) block for a future sanitary pumping station (Block 2);
- Nine (9) 0.3 m reserve blocks (Block 14 to 22)
- One (1) MTO setback block (Block 23)
- Three (3) blocks for the natural heritage features (Blocks 24 to 26); and

- One (1) block for future development (Block 27).

The purpose of the application for **Zone Change (file ZN8-24-03)** is to rezone the lands from Agricultural (AG), Environmental Protection 1 & 2 (EP1 & EP2) to Special Prestige Industrial Holding Zone (M1-12(H)), Special General Industrial Holding Zone (M3-40 (H)), Future Development Zone (FD) and to refine the limits of the current Environmental Protection 1 & 2 Zones (EP1 & EP2). The limits of the Environmental Protection Zones (EP1 and EP2) are proposed to be refined to reflect updated mapping based on the results of the Environmental Impact Study (EIS) and changed to a site-specific EP1-2 Zone to require a more detailed EIS for proposed site developments within 120 metres of the identified environmentally sensitive areas.

Alongside the applications the UTRCA has received the following documents:

- **Planning Justification Report**, prepared by GSP Group, dated February 2024;
- **Preliminary Geotechnical Investigation**, prepared EXP Services Inc., dated May 11, 2021;
- **Draft Geotechnical Investigation (Highway 401 Crossing)**, prepared EXP Services Inc., dated October 2021;
- **Preliminary Hydrogeological Assessment** prepared EXP Services Inc., dated March 28, 2022
- **Environmental Impact Study**, prepared by AECOM, dated August 2022;
- **Study Conceptual Stormwater Management and Water Balance**, prepared by AECOM, dated March 2023;
- **Integrated Master Plan Approach #4**, prepared by AECOM, dated May 2023;

DELEGATED RESPONSIBILITY & STATUTORY ROLE

Provincial Policy Statement 2020

The UTRCA has the provincially delegated responsibility for the natural hazard policies of the PPS, as established under the “Provincial One Window Planning System for Natural Hazards” Memorandum of Understanding between Conservation Ontario, the Ministry of Natural Resources and Forestry (MNRF) and the Ministry of Municipal Affairs and Housing. Accordingly, the Conservation Authority represents the provincial interest in commenting on development applications with respect to natural hazards and ensures that applications are consistent with the PPS.

The UTRCA’s role in the development process is comprehensive and coordinates our planning and permitting interests. Through the plan review process, we ensure that development applications meet the tests of the *Planning Act*, are consistent with the PPS, conform to municipal planning documents, and with the policies in the UTRCA’s Environmental Planning Policy Manual (2006). Permit applications must meet the requirements of Section 28 of the *Conservation Authorities Act* and the policies of the UTRCA’s Environmental Planning Policy Manual (2006). This approach ensures that the principle of development is established through the *Planning Act* approval process and that a permit application can be issued under Section 28 of the *Conservation Authorities Act* once all of the planning matters have been addressed.

Section 28 Regulations - Ontario Regulation 41/24

The subject lands are regulated by the UTRCA in accordance with Ontario Regulation 41/24, made pursuant to Section 28 of the *Conservation Authorities Act*. The regulation limit is comprised of:

- The Kenny Creek Provincially Significant Wetland Complex (GR 15) and the associated area of interference for the wetland complex; and
- The riverine hazards associated with the Lock Drain.

The attached Regulated Areas mapping identifies the approximate location of the regulated features. In cases where a discrepancy in the mapping occurs, the text of the regulation prevails and a feature determined to be present on the landscape may be regulated by the UTRCA.

Please note that the boundary of the Kenny Creek Provincially Significant Wetland (PSW) has been reviewed as part of the Environmental Impact Study (EIS), prepared ACOM. For the location of the Kenny Creek PSW Complex please refer to Figure 6-01 of the EIS. The UTRCA regulates the Kenny Creek PSW Complex as well as the lands within 120 metres of the wetland boundary.

The UTRCA has jurisdiction over lands within the regulated area and requires that landowners obtain written approval from the Authority prior to undertaking any site alteration or development within this area including filling, grading, construction, alteration to a watercourse and/or interference with a wetland.

NATURAL HAZARDS

Natural hazard planning involves planning for risks associated with naturally occurring processes. These risks include the potential for loss of life and property damage. In Ontario, prevention is the preferred approach for managing hazards in order to minimize these risks. The UTRCA represents the provincial interest in commenting on *Planning Act applications* with respect to natural hazards. The UTRCA's policies are consistent with the PPS and the applicable policies include:

3.2.2 General Natural Hazard Policies

These policies ensure that new development and site alteration are directed away from hazard lands. No new hazards will be created and existing hazards will not be aggravated through new development. As well, the UTRCA does not support the fragmentation of hazard lands through lot creation which is consistent with the PPS.

3.2.6 Wetland Policies

New development is not permitted in wetlands. Further, new development and site alteration may only be permitted in the area of interference and /or adjacent lands of a wetland if it can be demonstrated through the preparation of an Environmental Impact Study (EIS) that there will be no negative impact on the hydrological function of the wetland feature and no potential hazard impact on the development.

As discussed above, the boundary of the Kenny Creek PSW has been reviewed as part of the EIS prepared by AECOM. For the location of the Kenny Creek PSW please refer to Figure 6-01 of the EIS. Further, the EIS confirms the presence of the Cattail Mineral Shallow Marsh (MAS2-1), on the west side of Highway 401. Any development and site alteration, (i.e. installation of servicing infrastructure) within the area of interference of the wetland features will require a Section 28 permit or letter of clearance.

3.5.2 Policies for Stormwater Management and Erosion & Sediment Control Measures

Generally discusses the requirements for stormwater management (SWM) and ESC and the requirements for report submissions, while advocating for catchment area planning of SWM facilities. When discharging to watercourses, the UTRCA requires quantity controls to ensure that post-development flow rates are equal to or less than the pre-development rates for all the storm events from the 2 year to the 250 year storms.

DRINKING WATER SOURCE PROTECTION - *Clean Water Act*

The subject lands **are** located within a vulnerable area. For more information pertaining to drinking water source protection, please refer to the approved Source Protection Plan at:

<https://www.sourcewaterprotection.on.ca/approved-source-protection-plan/>

COMMENTS

It has been agreed on between the GRCA and the UTRCA staff that the GRCA would be the Conservation Authority lead and provide the technical review of the EIS and Hydrogeological Assessment for the entirety of the subdivision, while both Conservation Authorities will review the SWM for works

within their respective watershed jurisdictions. However, as the findings of these reports provide important connections to the overall design of the subdivision and stormwater management infrastructure, the UTRCA will require copies of these reports to administrative review.

1. The Environmental Impact Study (EIS) completed for the Northeast Industrial Park recommended preliminary buffers from the woodland and wetland communities, 15m and 30m respectively. Recommendation 3 of the EIS states: *'A review of ecological buffers should be completed at detailed design for future site plan approvals to determine the adequacy of preliminary buffers based on proposed adjacent land development.'* Further the EIS identifies that development associated with the proposed servicing plan has the potential to alter surface water quality and quantity and that changes to water contributions to wetland features have the potential to result in unsuitable conditions for the wetland features.
 - i. The UTRCA is supportive of the proposed holding provision requirement 17.3.12.2.3.1 iii) & 19.3.40.2.2.1 iii). Please note the reference to the subsection – Setbacks from Environmental Protection Zone EP1-2 in the draft ZBA, currently 25.3.1.2.2, should be revised to 25.3.2.2.1.
 - ii. The UTRCA is supportive of the proposed requirements contained in the proposed zoning provision 25.3.2.2.1 – Setback from Environmental Protection Zone EP1-2. The EIS shall review the hydrological functions of the wetlands, review any potential impacts and provide mitigation recommendations to ensure no negative impacts to the hydrological functions.
2. As recommended in the EIS, water quality and quantity monitoring, as well as wetland vegetation monitoring for the PSW is to occur pre to post construction to monitor impacts of land development activities on the PSW. The UTRCA recommends that a comprehensive design mitigation plan be developed following the guidelines specified in the Wetland Water Balance Monitoring Protocol (TRCA, 2016), along with the formulation of a mitigation plan. The wetland monitoring plan and the mitigation plan are to be included within the final Hydrogeological Assessment. Annual monitoring reports are to be circulated to the UTRCA and the GRCA.
3. Please identify the minimum setback from the wetlands to the proposed Street 'D' and any required grading. The UTRCA generally does not permit grading within 15 m of a wetland. If grading is proposed to encroach into the 15 m setback the details on the extent of the grading should be discussed within the EIS to ensure no negative impacts to the feature.
4. The UTRCA is generally satisfied with the proposed Highway 401 Servicing Corridor Crossing and Easement Alternative 2: Southerly Crossing from adjacent property. The UTRCA recommends that the servicing be located at a minimum 15 m from the Cattail Mineral Shallow Marsh (MAS2-1) as identified in the EIS. Any site alteration within 30 m of the MAS2-1 wetland feature will require a section 28 permit or letter of clearance from the UTRCA.
5. Various external infrastructure improvements have been identified to address capacity deficiencies. Any alteration works and construction associated with new and existing infrastructure within lands regulated by the UTRCA will require a section 28 permit or letter of clearance.
6. The UTRCA will require detailed Erosion and Sediment Control (ESC) drawing supported by notes, standards, inspection, monitoring and reporting duly signed, sealed, and dated by P.Eng. The ESC fence is to be constructed along the interface of the buffer and the development lot limits to prevent grading within the features and their associated buffers.

FUNCTIONAL SERVICING REPORT & WATER BALANCE

7. Please use section 5 of the County of Oxford Design Guidelines and Supplemental Specifications for Municipal Services for stormwater management.

8. The Draft Geotechnical Investigation, prepared by EXP Services Inc. reported groundwater levels in Table 3 varying from 1.35 m to 2.29 m. Please consider the effects of groundwater recharge on the proposed SWM infrastructure.
9. Under section 3.1, the Report mentioned the safe conveyance of the 250-year design storm event on the UTRCA portion of the watershed. The UTRCA requires the control of the 250-year storm. Please consider the control of the 250-year storm and not just the conveyance.
10. Please ensure that the proposed development does not affect the conveyance capacities of culverts, thus avoiding local flooding and ponding. Please consider the existing capacities of the three culverts identified as Outlet A1-A3 in the UTRCA watershed. The proposed development should not cause any conveyance or capacity issues for these culverts.
11. Under section 4.7, the Report lists 'reasonable soil conditions to match existing conditions infiltration rates' as a constraint. However, the Draft Geotechnical Report identified most of the local soils to be gravel, sand, and silt with only 18-20% clay. Please justify why infiltration is a constraint to meet the water balance requirements.
12. Under section 7.4, the Report notes that the portion of the subject lands located within the UTRCA watershed can utilize on-site permanent private systems (PPS) to manage SWM quantity controls and quality treatment. The UTRCA will require the PPS to control to the 250-year storm and provide enhanced water quality treatment. Additionally, a feature-based water balance analysis, to be implemented through the SWM design for the private parcels, will be required to ensure compensation for any loss of infiltration to the wetlands under proposed conditions.
13. The water balance calculations need to be refined at the design stage of the project by considering the local site slope, cover, and other properties. Also, the area 27.79 m² shown in Table 12 should be shown on the drawing supported by contour information.
14. As mentioned in comment 13, the UTRCA requires a feature-based water balance for the wetlands within the UTRCA watershed using the catchments areas contributing to each wetland feature. The UTRCA recommends establishing infiltration target volumes for each block to be implemented through the individual site plans. Please consider infiltration of only clean runoff.
15. In relation to the overall site and feature-based water balance the Report concludes that a minimum of 2 mm of daily runoff retention from 'clean' sources is required across the subject lands to match existing infiltration rates. The UTRCA requires justification for the proposed 2 mm of daily runoff retention for infiltration. The UTRCA suggests a target rainfall depth of 15-25 mm for proposed SWM LID for infiltration, considering the local soil composition with a maximum clay content of 20%.

UTRCA REVIEW FEES

Consistent with UTRCA Board of Directors approved policy; Authority Staff are authorized to collect fees for the review of *Planning Act* applications. Our fee for this review is as follows:

Planning Act Application Review

Draft Plan of Subdivision	\$1,360.00
Zoning By-law Amendment (minor)	\$ 580.00
Official Plan Amendment (minor)	\$ 580.00

Technical Report Review*

Functional Servicing Report	\$1,270.00
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TOTAL \$ 3,789.00

*Our technical peer review includes one (1) initial and one (1) subsequent review of the reports. Additional reports may be subject to subsequent review fees.

Section 28 permits will be required from both Conservation Authorities for works within the respective jurisdiction. Fees associated with the **Section 28 Permit Applications** will be determined upon submission.

RECOMMENDATION

As discussed above, the GRCA is the Conservation Authority lead for the proposed development and will provide the technical review of the EIS and Hydrogeological Assessment for the entirety of the subdivision. However, as the findings of these reports provide important connections to the overall design of the subdivision and stormwater management infrastructure, the UTRCA will require copies of these reports to administrative review.

In addition to these reports, both Conservation Authorities (UTRCA and GRCA) will review the SWM for works within their respective watershed jurisdictions. The UTRCA is of the opinion that our remaining concerns can be addressed in finalized reports as part of the conditions of approval. Pending the GRCA’s recommendation we offer the following conditions of draft plan approval in addition to, or in conjunction with, the conditions recommended by the GRCA:

- i. That prior to final approval, Owner shall provide a Final Stormwater Management Report and Water Balance Assessment, which addresses the Conservation Authority’s outstanding comments and concerns, to the satisfaction of the Upper Thames River Conservation Authority.
- ii. That prior to final approval, Owner shall provide a Final Hydrogeological Assessment which includes a detailed wetland monitoring and mitigation plan, to the satisfaction of the Upper Thames River Conservation Authority.
- iii. In conjunction with the submission of the engineering drawings, the Owner shall submit detailed grading plans and erosion and sediment control plans that will identify all erosion and sediment control measures for the subject lands to the satisfaction of the Upper Thames River Conservation Authority. The plans are to include measures to be used during all phases of construction including the installation of servicing under highway 401. Prior to any work on the site, the Owner shall implement these measures satisfactory to the Upper Thames River Conservation Authority.
- iv. In accordance with Ontario Regulation 41/24 made pursuant to Section 28 of the Conservation Authorities Act, the Owner shall obtain the necessary permits/approvals from the UTRCA prior to undertaking any site alteration or development within the UTRCA Regulated Area including filling, grading, construction, site alteration to watercourse and/or interference with a wetland.

Thank you for the opportunity to comment. Please contact the undersigned if you have any questions.

Yours truly,

UPPER THAMES RIVER CONSERVATION AUTHORITY



Laura Biancolin
Land Use Planner II

Enclosure – Regulated Areas Map (please print on legal size paper to ensure the accurate scale).

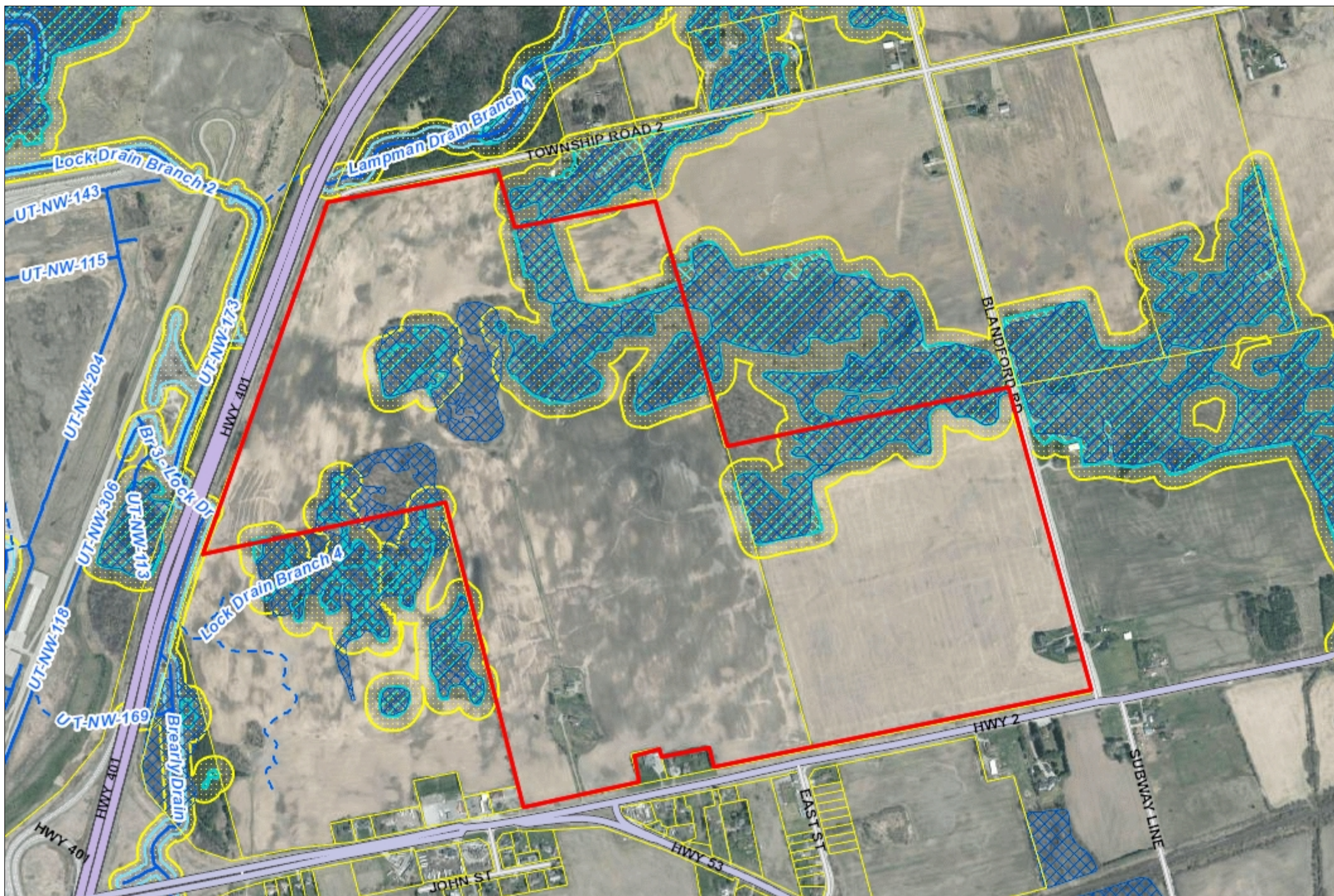
- c.c. Sent via e-mail -
GRCA – Jessica Conroy, Resource Planner
UTRCA - Imtiaz Shah, Senior Environmental Engineer
UTRCA - Ben Dafoe, Land Use Regulations Officer
GSP Group Inc. – Steve Wever (Applicant)
City of Woodstock – Harold de Hann (Owner)

Regulated Areas

Regulation under s.28 of the Conservation Authorities Act
 Development, interference with wetlands, and alterations
 to shorelines and watercourses. O.Reg 157/06, 97/04.

Legend

- Assessment Parcel (MPAC)
- Watercourse (UTRCA, 2020)**
 - Open
 - Closed Design/Tiled
- Wetlands (MNR)**
 - Evaluated-Provincial
 - Evaluated-Other
 - Not Evaluated
- Regulated Wetland
- Flooding Hazard Limit
- Erosion Hazard Limit
- Regulation Limit 2024



The mapping is for information screening purposes only, and shows the approximate regulation limits. The text of Ontario Regulation 157/06 supersedes the mapping as represented by this data layer. This mapping is subject to change. A site specific determination may be made by the UTRCA.

This layer is the approximate limit for areas regulated under Ontario Regulation 157/06 - Upper Thames River Conservation Authority: Development, Interference with Wetlands and Alterations to Shorelines and Watercourses, which came into effect May 4, 2006.

The UTRCA disclaims explicitly any warranty, representation or guarantee as to the content, sequence, accuracy, timeliness, fitness for a particular purpose, merchantability or completeness of any of the data depicted and provided herein.

The UTRCA assumes no liability for any errors, omissions or inaccuracies in the information provided herein and further assumes no liability for any decisions made or actions taken or not taken by any person in reliance upon the information and data furnished hereunder.

This map is not a substitute for professional advice. Please contact UTRCA staff for any changes, updates and amendments to the information provided.

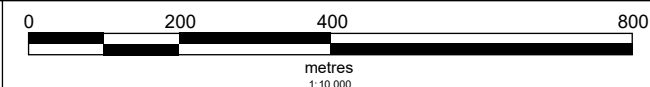
This document is not a Plan of Survey.

Sources: Base data, Aerial Photography used under licence with the Ontario Ministry of Northern Development, Mines, Natural Resources and Forestry Copyright © Queen's Printer for Ontario; City of London.

Notes:
 685761 Highway 2 & 775019 Blandford Road, City of Woodstock

Created By: LB May 6, 2024

* Please note: Any reference to scale on this map is only appropriate when it is printed landscape on legal-sized (8.5" x 14") paper.





Administration Centre: 400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519-621-2761 Toll free: 1-866-900-4722 Fax: 519-621-4844 www.grandriver.ca

May 24, 2024

via email

GRCA File: SB 24-02-8 & ZN 8-24-03 - 685761 Highway 2 & 775019 Blandford Road

Eric Gilbert
Manager of Development Planning
County of Oxford Community Planning Office
21 Reeve Street
Woodstock, ON N4S 7Y3

Dear Eric Gilbert,

Re: Draft Plan of Subdivision and Zone Change Applications (SB 24-02-8 & ZN 8-24-03)
685761 Highway 2 & 775019 Blandford Road, City of Woodstock, Oxford County
Agent: GSP Group Inc. c/o Steve Wever
Owner: The Corporation of the City of Woodstock

Grand River Conservation Authority (GRCA) staff has reviewed the above-noted Draft Plan of Subdivision and Zone Change applications.

We understand the purpose of these applications is to facilitate the development of a municipal industrial plan of subdivision. The proposed plan of subdivision will contain 9 blocks for industrial development, 2 road widening blocks, 1 block for stormwater management purposes, 1 block for a future sanitary pumping station, 2 road widening blocks, 9 0.3 m reserve blocks, 1 MTO setback block, 3 natural heritage blocks, and a block for future development served by 5 new local streets.

We understand the proposed zone change application will rezone the subject lands from Agricultural (AG), Environmental Protection 1 & 2 (EP1 & EP2) to Special Prestige Industrial Holding Zone (M1-12(H)), Special General Industrial Holding Zone (M3-40 (H)), Future Development Zone (FD) and Environmental Protection Zone 1 & 2 (EP1 & EP2). These proposed zones will implement the proposed draft plan of subdivision.

Recommendation

At this time, GRCA staff recommends that the County of Oxford defers the decision on the Draft Plan of Subdivision and Zone Change applications until the below comments are addressed.

Please include a comment response table with a future submission identifying how the comments have been addressed. Please also provide digital copies of the modelling with future submissions.

Documents Reviewed by Staff

GRCA staff have reviewed the following information submitted in association with the proposed development:

- Draft Plan of Subdivision (AECOM, March 2023);
- Conceptual Stormwater Management and Water Balance (Prepared by AECOM, dated March 2023);
- Draft Zoning By-law Amendment Application (City of Woodstock, February 2 2024);

- Draft Plan of Subdivision Application (Oxford County, January 26 2024);
- Preliminary Hydrogeological Assessment (EXP Services Inc., dated March 28 2022);
- Northeast Woodstock Industrial Park Planning and Servicing Study Planning Justification Report (Prepared by GSP Group, dated February 2024);
- Northeast Woodstock Industrial Park Planning and Servicing Study Integrated Master Plan (Prepared by AECOM, dated May 2023);
- Preliminary Geotechnical Investigation (prepared by exp. Services Inc., dated May 11 2021); and
- Anderson drain Geomorphology and Function Memo (AECOM, May 3 2022).

GRCA staff have previously provided pre-consultation comments on the proposed subdivision, dated March 24, 2020.

GRCA Comments

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 3.1 of the Provincial Policy Statement (PPS, 2020), 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.

Based on information currently available at this office, the subject property is divided between Grand River Conservation Authority (GRCA) and Upper Thames River Conservation Authority (UTRCA) jurisdictions.

The subject lands contain portions of the Kenny Creek Provincially Significant Wetland Complex. The subject lands also contain the regulated watercourses Balls Municipal Drain and the Anderson Municipal Drain. As a result, portions of the subject property are regulated by the Grand River Conservation Authority and Upper Thames River Conservation Authority under Ontario Regulation 41/24. We have included a copy of GRCA's current resource mapping for reference.

It has been coordinated between GRCA and UTRCA staff that GRCA would be the lead reviewer for the EIS and Hydrogeological review for the subdivision, while both conservation authorities are reviewing the Stormwater Management Reports for works within respective watershed jurisdictions. Each conservation authority is submitting their comments for this subdivision under separate cover. Please note that permits will also be required from both conservation authorities for works within the respective watershed jurisdictions.

Comments to be Addressed Prior to Consideration of Draft Plan Conditions:

GRCA Ecology Comments on the Conceptual Stormwater Management and Water Balance Report (AECOM, March 2023):

1. Section 4.7 Opportunities and Constraints, Constraint #3 the report states "*The existing outlet location on the GRCA side of the subject lands is a small Municipal Drain (Balls Drain) with very shallow and poorly defined surface channel features, which will not be an adequate outlet for collected storm drainage discharge from a SWM facility. The existing drain may not be serviceable due to conveyance capacity and depth-to-cover constraints. This drainage pipe likely cannot convey discharge from a local storm sewer or SWM facility outlet due to the above-mentioned physical constraints*". Constraint #4 states "*To service the eastern portion of the site, the SWM facility will be required to be located on the Phase 3A lands and have a sufficient outlet. A future storm sewer is required to be designed and*

constructed along Blandford Road discharging to Anderson Drain along County Road 2 to provide an adequate outlet". If a storm sewer is required to be designed and constructed to support this proposed development, it should be part of the development plan and incorporated into the study area and study details and not deferred to future applications. The feasibility and sequencing for a required storm sewer outlet should be determined.

2. Section 5.5.2 Wet Pond Sizing, the report identifies that the SWM Facility has been designed to include an interim condition where Phase 3A lands will remain undeveloped to allow for expansion to accommodate the ultimate conditions for the site: *"This SWM facility will require a piped outlet along Blandford Road to Oxford County Road 2, where the sewer will outlet east of Blandford Road to Anderson Drain / Kenny Creek. Overland flow from this SWM facility is to follow existing conditions topography and conveyed across Blandford Road in alignment with the existing Balls Drain where it will ultimately discharge to Anderson Drain / Kenny Creek"*. A complete evaluation of the existing conditions within the outlet along Blandford Rd. to Oxford County Rd. 2 to Anderson Drain and finally Kenny Creek should be completed to identify how the current conditions, capacity, stability, and erosion threshold will be impacted.
3. The proposed Subject Lands water balance shows a proposed approximate 1.5 times increase in the controlled surface runoff from the Subject Lands. The proposed outlet route identified in Appendix G Fluvial Geomorphology Memorandum (AECOM, May 2, 2022) as showing signs of slumping and accumulation of loose unconsolidated sediments. Only Reach KC-1c was evaluated and was identified as being transitional or in a stressed condition with an overall stability index of 0.28. The report also identifies *"evidence of instability is frequent"* with dominant processes of aggradation and widening. The report further states *"The process of aggradation is generally influenced by discharge, sediment load, morphological characteristics, and changes in flow regime due to human activity"*. For Channel Widening the report states *"This typically occurs as a result of the channel attempting to enlarge its cross section due to changes in flow regimes, such as those resulting from increased urbanization (i.e., increased stormwater flows due to higher impervious surface and therefore elevated runoff)." As the SWM report and water balance is proposing an approximate 1.5 times increase in runoff from the Subject Lands this would contribute to further instability and channel erosion to the receiving waterways. This should be addressed.*
4. Subject Site Water Balance: Grand River Catchment of Subject Site

	<i>Infiltration mm/m³</i>	<i>Runoff mm/m³</i>
<i>Table 12 Existing Condition Water Balance</i>	<i>193/199,000</i>	<i>269/277,800</i>
<i>Table 13 Proposed Condition Water Balance uncontrolled</i>	<i>99/101,500</i>	<i>642/655,300</i>
<i>Table 14 Proposed Condition Water Balance LID</i>	<i>197/261,200</i>	<i>545/555,900</i>

The proposed runoff volume is twice the pre development volume. This proposed volume is to be directed to Anderson Municipal Drain and Kenny Creek. The May 3, 2022 Fluvial Geomorphology Memorandum identifies the reach KC-1c as being in a transitional or stressed condition with an overall stability index of 0.28 and *"evidence of instability is frequent"* with dominant processes of aggradation and widening. The proposed outlet has not been thoroughly assessed to determine if it has the capacity to handle the increase in volume without causing erosion and instability issues. This should be amended.

5. The August 2022 DRAFT Northeast Industrial Park Planning and Servicing Study Water Servicing – Environmental Impact Study (Prepared by AECOM) should be amended to review and interpret the most current SWM and Water Balance reports.

Engineering Comments on the Conceptual Stormwater Management and Water Balance Report (AECOM, March 2023) and associated figures and drawings:

1. Section 5.1 indicates an imperviousness of 75% has been applied to the site in accordance with City of London Design Specifications for commercial/industrial lands. 75% represents the lowest imperviousness in the range provided in Table 6.1 of the City Specifications for this land use (i.e., 75% to 90%) and may result in an underestimate of the required quantity control and infiltration volume. Please consider increasing the imperviousness, provide justification for the low value, or provide a clear discussion within the report of any development limitations and/or requirements if future development plans propose imperviousness in excess of 75%.
2. Please explicitly explain within – or prior to – Section 5.4 the level and extent of development that represents the interim condition and reference the appropriate figure.
3. Sheet 1A (Storm Sewer Area Plan) shows blue linework suggesting connectivity within the Kenny Creek Wetland Complex. Please clarify how it was determined that catchments B20-1, B20-3 and B2-6,7 drain to outlet B2 and not B1.
4. Section 8 (Erosion and Sediment Control) should reference the Sustainable Technologies Evaluation Program (STEP) Erosion and Sediment Control Guide for Urban Construction (TRCA, 2019 – see www.sustainabletechnologies.ca)

Comments Specific to GRCA:

5. The outfall B1, B2 and B3 locations shown on Figure 6 do not match those shown on the existing conditions modelling schematic figure in the appendix. Please provide some discussion in the report to clarify the difference and to indicate which locations the flows listed in Table 4 correspond to. Please also clarify how the existing condition B1, B2 flow locations relate to the proposed condition B1, B2 and B3 locations.
6. Please clarify why no existing condition flows are listed for Outlet B3 in Table 4.
7. The flows listed in column “B1+B2+B3” in Table 5 do not appear correct. Please update as required.
8. The third paragraph of Section 5.5.5 refers to an east-west conveyance swale. It appears this may be shown as a storm sewer on Figure 7. Please show on the figure and clarify the drainage area in the text.
9. Sheet 1A (Storm Sewer Area Plan) should be referenced in Section 5.5.6 so that the assumed drainage area to the perimeter swale is clearly identifiable for any future development plans/studies. Also, the perimeter swale should be shown on Figure 7.
10. It is unclear from the text and figures what the stormwater management plan is for the lands north of outlet B1. Figure 7 shows “onsite stormwater controls”. Please indicate the area, assumed imperviousness, outlet location, and quantity/quality control requirements for this area.
11. Section 5.5.2 indicates that a 50-m wide emergency overflow weir will discharge flows across Blandford Road. It is unclear if this discharge will flow across the surface of the road or via a culvert. Please clarify.
12. Tables 8 and 9 show negative freeboard during the 250-year and Hazel events. Please clarify if the freeboard is relative to the weir elevation or the top of berm.

13. It is unclear whether the peak discharges from the SWMF in Tables 8 and 9 correspond to proposed outlet B2 or B3, or a combination of those two. Please clarify in the report text or with Table notes. Assuming it is outlet B3, it is unclear why the Interim Condition peak discharges listed in Table 8 for the 250-yr (24-hr) and Hurricane Hazel do not match those for Outlet B3 in Table 5. Similarly, for the Ultimate Condition, peak discharges for the same storms in Table 9 do not match those for Outlet B3 in Table 6.
14. The drainage area and % impervious to the SWMF listed in Table 10 include catchments B20-1, B20-3 and B2-6 and B2-7. Per comment above, further justification of including these areas in the SWMF and Outlet B2 catchment area rather than Outlet B1 is required.
15. It would be helpful if an additional table was provided to identify existing and proposed flows at each outlet.
16. The outfall summary tables in Appendix C indicate an 84% increase in 25 mm event flows to Outlet B (Anderson Drain) in interim and ultimate conditions. Please explain why existing rates are not met for this event. If the intention is to maintain this increase through final design, the draft Fluvial Geomorphology Memorandum in Appendix G should include some discussion related to the impact of the increase in flows during frequent events on the Anderson Drain and provide recommendations for mitigation measures. The increase in flow and geomorphological recommendations should be discussed in the main report.
17. Section 5.5.7 discusses a culvert under Street E that will convey flows from the east-west swale to the SWMF. Please show the culvert and conveyance route/method from the culvert to the SWMF on Figure 7.
18. The storm sewer arrows on Sheet A1 do not match those in the legend and Figure 7 shows a storm sewer heading northward to the terminus of Street E at the SWMF. Please confirm if the SWMF will have a single inlet (i.e., downstream of the east-west swale) or two (i.e., one for the storm sewer system at the north end of Street E and one from the east-west system).
19. In Table 10, the required MOE Quality treatment volumes (total and permanent pool) should be adjusted to reflect the area and imperviousness for each development condition. They are currently shown as identical.
20. Please clarify how the flows presented in Table 11 relate to the "Peak Inflow" rates presented in Tables 8 and 9.
21. Some of the catchment area labels on Figure 6 do not match those in the calculations provided in Appendix C and there are no catchment area labels provided on Figure 7. Please correct Figure 6 and provide labels on Figure 7.
22. The groundwater table elevation relative to the pond bottom is based on 2020 data. Please clarify why more recent data was not used. Additionally, given the groundwater elevation is above the pond bottom, the report should indicate that a liner will be required.
23. For Draft Plan approval, the report must clearly indicate and demonstrate that the SWM block size is adequate to provide the required quality and quantity volumes in addition to maintenance access, forebay berm, grading, etc. that meet municipal standards.
24. Section 5.5.4 defers additional assessment of the downstream receiver (Anderson Drain) to detailed design. This work should be completed prior to Draft Plan approval to ensure the SWMF block is adequately sized.

With respect to the modelling:

25. The 25 mm event is only showing 23.55 mm of precipitation. Please correct.
26. The 12-hour hurricane Hazel event was run with AMC II conditions – should be changed to 48-hour OR AMC III.

With respect to the water balance:

27. The calculations provided in the appendix show an infiltration factor of 0.20 for “woodland/wetland” under existing conditions. For proposed conditions, the label for this factor has been modified to “woodland/wetland/open space” and for the UTRCA catchment, the area has increased from 5.67 ha to 26.51 ha. Please clarify the use of the 0.20 factor for “open space” for the developed condition as it would be assumed that any open space beyond the limits of the existing woodland/wetland would be maintained as lawns with a factor of 0.5.
28. It is unclear how UTRCA infiltration under proposed uncontrolled conditions (231 mm) is greater than existing conditions (217 mm). It is understood that the UTRCA area increases by approximately 1.3 ha under proposed conditions, but that increase would not be expected to result in an overall increase in infiltration under the proposed commercial/industrial development conditions. Additionally, it is unclear why the proposed condition with LID infiltration (208 mm) is less than existing condition (217 mm). Please clarify.
29. Please update the Catchment ID’s presented in the bullets below Figure 9 on page 37 and/or Figures 6 and 7 to ensure they match.
30. Please explain why the runoff and infiltration volumes presented in the 2023 Servicing/SWM/Water Balance study (AECOM) are significantly different from those presented in the 2022 Hydrogeological report (exp).
31. The 2023 Servicing/SWM/Water Balance study (AECOM) indicates that more detailed water balance calculations should be considered as information from geotechnical, hydrogeological and environmental studies are completed. It appears that draft copies of such reports were completed in 2022. Please ensure the water balance reflects the information provided by those studies.
32. It is unclear how the infiltration requirement of 2 mm/day is to be met in the field since it does not rain every day. Please provide direction on how infiltration requirements can/should be calculated on a site-by-site basis.
33. Please clarify how/why the City of Toronto curves can be considered applicable to Woodstock.
34. Please clarify how the feature-based water balance differs from the site-wide balance and provide clear instructions of what will be required for individual site-plans.

Advisory Comments to the County of Oxford:

- The existing Municipal Drain Engineer Design Reports for the Ball Drain and the Anderson Drain should be reviewed and compared to the existing conditions. This would help determine if the channels have the capacity and ability to adequately handle the proposed increase in discharges off the developed Subject Site.
- A draft Geomorphology and Function memo for Anderson drain (AECOM, May 2022) was included in the report and should be finalized, considering any changes in interim and/or ultimate development condition flows that result from changes associated with any of the preceding comments.
- With respect to Section 5.5.6 of the Conceptual Stormwater Management and Water Balance Report (Wetland and Perimeter Conveyance), the proposed perimeter conveyance

swale adjacent to the Kenny Creek PSW should be located outside of the recommended wetland buffer since it is part of the planned and operational SWM treatment train. This will help with future maintenance and minimize impacts to the wetland and its associated buffer.

Comments for Detailed Design:

- Section 5.5.3 of the Stormwater Management and Water Balance Report (Groundwater Impacts) states “*Based on these initial findings, the groundwater elevation varies from 2.44 m - 3.19 m above the bottom of the SWM facility. It is recommended to continue data collection for a minimum of one year to capture the high and low seasonal groundwater elevations prior to detailed design*”. This should be completed as part of detailed design.
- No erosion control measures are shown at the outfall of the storm sewers to Anderson Drain and the east-west swale. This will be required at the detailed design stage.

GRCA Permit

We advise the applicant that a permit pursuant to Ontario Regulation 41/24 will be required from the GRCA prior to any development or site alteration within the regulated areas on the property. The GRCA permit will be made a condition of draft plan approval.

GRCA Plan Review Fees

GRCA charges a fee for its plan review services in accordance with the current approved GRCA Plan Review Fee Schedule. The fee required for the review of draft plans of subdivision is a \$2,505 base fee in addition to a fee of \$1,305 per net hectare (excluding natural areas), with the total fee capped at \$30,000. Based on the proposed 110 hectares (excluding natural areas) to be developed, a total fee of \$30,000 is required. Please note that 70% (\$21,000) is due now, while the remaining 30% (\$9,000) will be required prior to the issuance of conditions of draft plan approval. Based on this, the applicant will be invoiced in the amount of \$21,000 at this time for the GRCA’s review of this application.

Should you have any questions, please contact me at jconroy@grandriver.ca or 519-621-2763 extension 2230.

Sincerely,



Jessica Conroy, MES PI.
Resource Planner
Grand River Conservation Authority

Enclosed: GRCA Map of Subject Lands

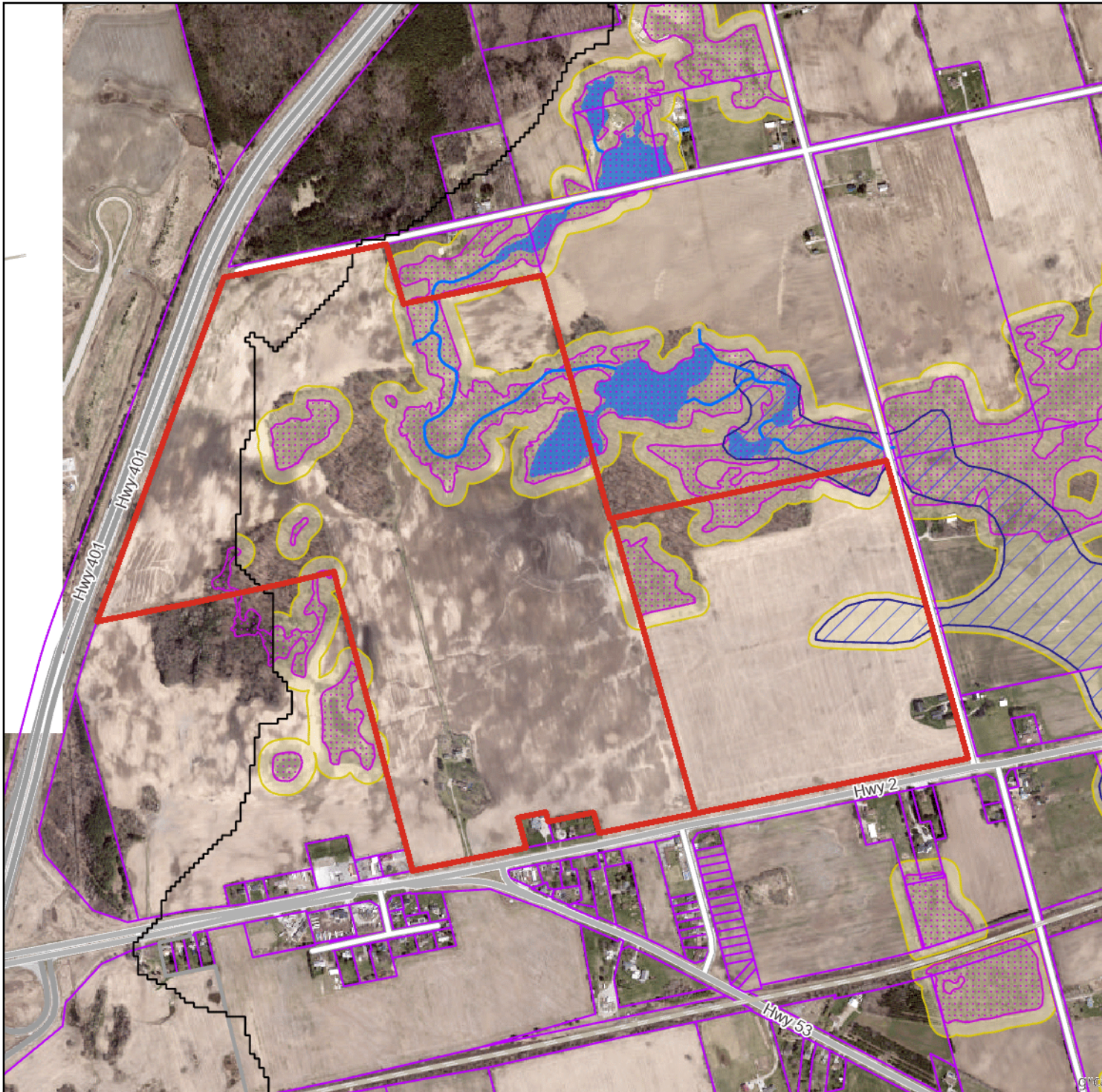
Copied (via email): Steve Walker, GSP Group (Applicant)
Harold de Hann, City of Woodstock (Owner)
Laura Biancolin, Land Use Planner II (UTRCA)



685761 Highway 2 & 775019
Blandford Road, City of Woodstock

Legend

- Regulation Limit (GRCA)
- Floodplain (GRCA)
 - Engineered
 - Estimated
 - Approximate
- Floodplain - Special Policy Area (GRCA)
- Slope Erosion (GRCA)
 - Steep
 - Oversteep
 - Toe
- Slope Valley (GRCA)
 - Steep
 - Oversteep
- Regulated Watercourse (GRCA)
- Regulated Waterbody (GRCA)
- Wetland (GRCA)
- Lake Erie Flood (GRCA)
- Lake Erie Shoreline Reach (GRCA)
- Lake Erie Dynamic Beach (GRCA)
- Lake Erie Erosion (GRCA)
- Parcel - Assessment (MPAC/MNRF)
- Conservation Area Boundary (GRCA)



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Disclaimer: This map is for illustrative purposes only. Information contained herein is not a substitute for professional review or a site survey and is subject to change without notice. The Grand River Conservation Authority takes no responsibility for, nor guarantees, the accuracy of the information contained on this map. Any interpretations or conclusions drawn from this map are the sole responsibility of the user.

The source for each data layer is shown in parentheses in the map legend. See Sources and Citations for details.



Schedule "A"
Attachment No. 6
To Report No. CP 2024-180

CONDITIONS OF DRAFT APPROVAL – FILE NO. SB 24-02-8 – City of Woodstock

1. This approval applies to the draft plan of subdivision submitted by the City of Woodstock and prepared by AECOM as shown on Plate 3 of Report No. 2024-129 and comprising Part of Lots 7, 8 and 9, Concession 1 (Blandford), in the City of Woodstock showing nine blocks for industrial development, three natural heritage blocks, one block for stormwater management and a future sanitary pumping station, and a number of blocks for road widenings and 0.3 m (1 ft) reserves, served by 5 new local streets.
2. The road allowances included in the draft plan of subdivision shall be dedicated as public highways to the satisfaction of the City of Woodstock.
3. The streets included in the draft plan of subdivision shall be named to the satisfaction of the City of Woodstock.
4. The owner agrees in writing that temporary turning circles and/or emergency access ways will be provided, as necessary, to the satisfaction of the City of Woodstock.
5. The owner agrees that 0.3 m (1 ft) reserves shall be conveyed to the City or County, as the case may be, free of all costs and encumbrances, to the satisfaction of the City and/or County.
6. Such easements as may be required for utility, servicing or drainage purposes shall be granted to the appropriate authority.
7. Prior to the signing of the final plan by the County, all lots/blocks shall conform to the zoning requirements of the City's Zoning By-Law. Certification of lot areas, frontages, and depths, shall be provided to the City by an Ontario Land Surveyor retained by the owner.
8. The owner agrees in writing that further development will be subject to site plan approval where servicing, grading, stormwater management, setbacks to environmental areas, traffic/transportation, landscaping, etc. will be reviewed in further detail.
9. The Owner agrees in writing to satisfy all the requirements, financial (including payment of applicable development charges, etc.) and otherwise, of Oxford County Public Works regarding the installation of the water distribution system, the installation of the sanitary sewer system including Sewage Pumping Station (SPS) and forcemains, construction of County road improvements necessitated by development, and other matters pertaining to the development of the subdivision in accordance with County Standards.
10. The Owner shall provide service provisions for future development, to the satisfaction of Oxford County Public Works Department. Of particular note, the Owner agrees to design and size the sanitary sewer collection and water distribution systems within the Plan of Subdivision to accommodate future flows from upstream/tributary areas including lands

identified within the Northeast Woodstock Secondary Plan area, subject to cost sharing with the County for service oversizing, to the satisfaction of Oxford County Public Works.

11. The Owner shall agree in the Subdivision Agreement that the final location of the Sewage Pumping Station (SPS) will be located in an area that adequately services the site and also provides maximum drainage benefit to surrounding external lands; including, but not limited to, lands identified within the Northeast Woodstock Secondary Plan area. The final location and complete design of the SPS shall be reviewed and approved by Oxford County Public Works.
12. The Owner shall agree in writing that the SPS will be owned and operated by Oxford County Public Works. Block 2 shall be conveyed to the County, free of all costs and encumbrances, for the location of the Sewage Pumping Station. The Block shall provide access from a public road. The Owner agrees to increase/amend size of draft Block 2 if deemed required following detailed design, to the satisfaction of Oxford County Public Works.
13. The Owner shall agree in the Subdivision Agreement to fund the cost of any transportation network improvements that are attributable to the Draft Plan of Subdivision to the satisfaction/approval of Oxford County Public Works, MTO, and the City of Woodstock.
14. The Owner agrees that subdivision/site entrances and all related costs are considered local services and a direct developer responsibility.
15. The Owner agrees to implement the recommendations contained within the various technical reports (e.g. Integrated Master Plan, Water, Wastewater, Stormwater, Transportation, etc.) submitted in support of the subject draft plan of subdivision application, including any amendments thereto, and the preparation and submission of detailed engineering drawings and reports to the satisfaction of Oxford County and/or the City of Woodstock.
16. Prior to the signing of the final plan by the County, the Owner shall agree in writing that all phasing of the plan of subdivision will be to the satisfaction of the City and County. Furthermore, the Owner acknowledges that servicing/development of the plan of subdivision is dependent on various planning, design, approval, and construction phases for implementation of external services/existing system upgrades.
17. The Owner shall agree to prepare and submit for the approval of Oxford County Public Works, detailed servicing plans designed in accordance with the Oxford County Design Guidelines.
18. Prior to the final approval of the subdivision plan, the Owner shall receive confirmation from Oxford County Public Works that there is sufficient capacity in the City of Woodstock water and sanitary sewer systems to service the plan of subdivision.

19. The Owner agrees to provide such easements as may be required for utility or drainage purposes outside of the proposed public right-of-ways shall be granted to the appropriate authority free of all costs and encumbrances to the satisfaction of the appropriate authority. Furthermore, the Owner agrees to provide any temporary easements as deemed required by the appropriate authority.
20. The Owner agrees in writing, that 0.3 m (1 ft) reserves along Oxford Road 2 (Highway 2), shall be conveyed to the County as required, free of all costs and encumbrances, to the satisfaction of Oxford County Public Works.
21. Prior to final approval by the County, the Owner shall properly decommission any abandoned private services (water well, cistern and/or septic system) located on the subject lands, in accordance with the Ontario Water Resources Act, R.S.O. 1990 (Ontario Regulation No. 903) and to the satisfaction of Oxford County Department of Public Works.
22. The subdivision agreement shall make provision for the assumption and operation by Oxford County of the water and sewage system within the draft plan subject to the approval of Oxford County Public Works.
23. Storm water drainage proposed to be directed to any County Road allowance shall be managed/attenuated to pre-development conditions to the satisfaction of Oxford County Public Works and City of Woodstock.
24. The Owner shall demonstrate/implement to the satisfaction of Oxford County that the entire subdivision, and each phase of development, shall provide adequate redundancy and looping for domestic and fire water protection services.
25. Appropriate cul-de-sacs/turnaround areas are required to ensure proposed roadways have adequate turning radius/unobstructed access (without reversing) for waste collection and emergency vehicles. Cul-de-sac design will follow all County/City of Woodstock Guidelines.
26. All properties sold in this subdivision will be subject to Site Plan Approval. Through the City's Agreement of Purchase and Sale to sell land in this subdivision, the City of Woodstock will require each purchaser to request Oxford County confirm sufficient water and wastewater capacity for the proposed development as part of the normal due diligence process contained in the City's Agreement of Purchase and Sale. Based on these flows, Oxford County shall confirm that they can be accommodated by the Woodstock water and sanitary sewer system and the Sanitary Pumping Station serving the lands.
27. Prior to the final approval of the plan by the County, the Owner shall provide a final Stormwater Management Report and Water Balance Assessment, which addresses the Conservation Authority's outstanding comments and concerns, to the satisfaction of the Upper Thames River Conservation Authority.
28. Prior to the final approval of the plan by the County, the Owner shall provide a final Hydrogeological Assessment which includes a detailed wetland monitoring and mitigation plan, to the satisfaction of the Upper Thames River Conservation Authority.

29. Prior to the final approval of the plan by the County, in conjunction with the submission of the engineering drawings, the Owner shall submit detailed grading plans and erosion and sediment control plans that will identify all erosion and sediment control measures for the subject lands to the satisfaction of the Upper Thames River Conservation Authority. The plans are to include measures to be used during all phases of construction including the installation of servicing under Highway 401. Prior to any work on the site, the Owner shall implement these measures satisfactory to the Upper Thames River Conservation Authority.
30. In accordance with Ontario Regulation 41/24 made pursuant to Section 28 of the Conservation Authorities Act, the Owner shall obtain the necessary permits / approvals from the UTRCA prior to undertaking any site alteration or development within the UTRCA Regulated Area, including filling, grading, construction, site alteration to watercourse and/or interference with a wetland.
31. Prior to the final approval of the plan by the County, in conjunction with the submission of the engineering drawings, the Owner shall submit detailed grading plans and erosion and sediment control plans that will identify all erosion and sediment control measures for the subject lands to the satisfaction of the Grand River Conservation Authority. The plans are to include measures to be used during all phases of construction. Prior to any work on the site, the Owner shall implement these measures satisfactory to the Grand River Conservation Authority.
32. In accordance with Ontario Regulation 41/24 made pursuant to Section 28 of the Conservation Authorities Act, the Owner shall obtain the necessary permits / approvals from the GRCA prior to undertaking any site alteration or development within the GRCA Regulated Area, including filling, grading, construction, site alteration to watercourse and/or interference with a wetland.
33. Prior to the final approval of the plan by the County, the Owner shall provide a clearance letter from the Grand River Conservation Authority indicating that the comments and concerns identified in their agency response letter, dated May 24, 2024, have been satisfactorily addressed.
34. Prior to the approval of the final plan by the County, the owner shall agree in writing to satisfy the requirements of Canada Post Corporation with respect to advising prospective purchasers of the method of mail delivery; the location of temporary Centralized Mail Box locations during construction; and the provision of public information regarding the proposed locations of permanent Centralized Mail Box locations, to the satisfaction of Canada Post.
35. Prior to the approval of the final plan by the County, the owner shall agree in writing, to satisfy the requirements of Enbridge Gas that the owner/developer provide Enbridge Gas Limited with the necessary easements and/or agreements required for the provisions of gas services, to the satisfaction of Enbridge Gas Limited.

36. Prior to the approval of the final plan by the County, the owner shall submit an archaeological assessment of the subject property and mitigate, through preservation or resources removal and documentation, adverse impacts to any significant archaeological resources found. No grading or other soil disturbances shall take place on the subject property prior to the issuance of a clearance letter by the Ministry of Culture confirming that all archaeological resource concerns have met licensing and resource conservation requirements.
37. Prior to final approval by the County, the owner shall provide a list of all conditions of draft approval with a brief statement detailing how each condition has been satisfied, including required supporting documentation from the relevant authority, to the satisfaction of the County of Oxford.
38. Prior to final approval by the County, the County of Oxford shall be advised by the City of Woodstock that conditions 2 to 8 (inclusive) have been met to the satisfaction of the City. The clearance letter shall include a brief statement for each condition detailing how each has been satisfied.
39. Prior to final approval by the County, the owner shall secure clearance from the County of Oxford Public Works Department or other appropriate County department, that conditions 6, 8 to 26 (inclusive) have been met to the satisfaction of County Public Works and/or Community Planning. The clearance letter shall include a brief statement for each condition detailing how each has been satisfied.
40. Prior to final approval by the County, the owner shall secure clearance from the Upper Thames River Conservation Authority that conditions 27 to 30 (inclusive), have been met to the satisfaction of the UTRCA. The clearance letter shall include a brief statement for each condition detailing how each has been satisfied.
41. Prior to final approval by the County, the owner shall secure clearance from the Grand River Conservation Authority that conditions 31 to 33 (inclusive), have been met to the satisfaction of the GRCA. The clearance letter shall include a brief statement for each condition detailing how each has been satisfied.
42. Prior to final approval by the County, the County of Oxford shall be advised by Canada Post Corporation that condition 34 has been met to the satisfaction of Canada Post. The clearance letter shall include a brief statement detailing how this condition has been satisfied.
43. Prior to final approval by the County, the County of Oxford shall be advised by Enbridge Gas that condition 35 has been met to the satisfaction of Enbridge Gas. The clearance letter shall include a brief statement detailing how this condition has been satisfied.
44. The plan of subdivision shall be registered prior to June 12, 2027, after which time this draft approval shall lapse unless an extension is authorized by the County of Oxford.