

Comment Response Matrix

Briarwood Homes, Ida Street, Dundalk

Zoning Bylaw Amendment and submission #1

IPS File No. 23-1304

Comment Matrix Date: August 28, 2025 (Updated October 16, 2026)

Township of Southgate

Legend – Consultants:

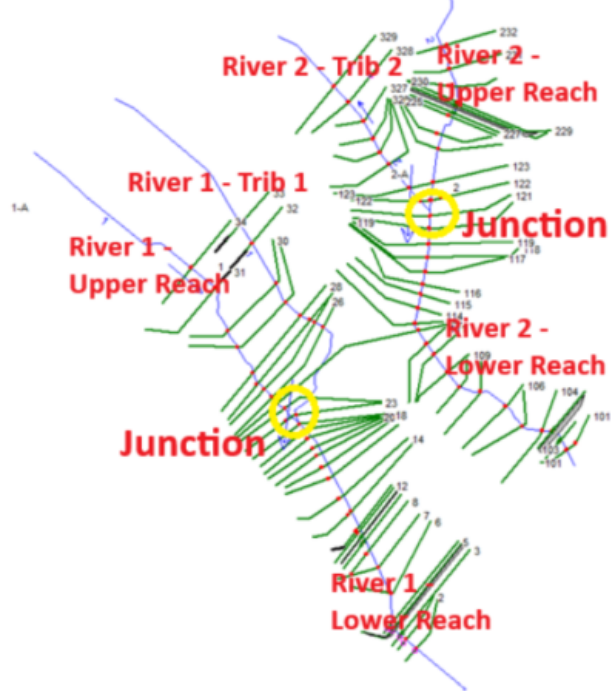
- o Planner: IPS – Innovative Planning Solutions
- o Surveyor: J.D. Barnes Ltd.
- o Civil Engineer: Valdor
- o Geotechnical/Hydrogeological Engineers: Soils Engineering Ltd.
- o Archeologist: Earthworks Archaeological Services Inc.
- o Traffic: Paradigm
- o Ecology: Birks
- o D-4 Study: Palmer
- o D-2 & D-6 Studies: Sonair
- o Landscape: Adesso

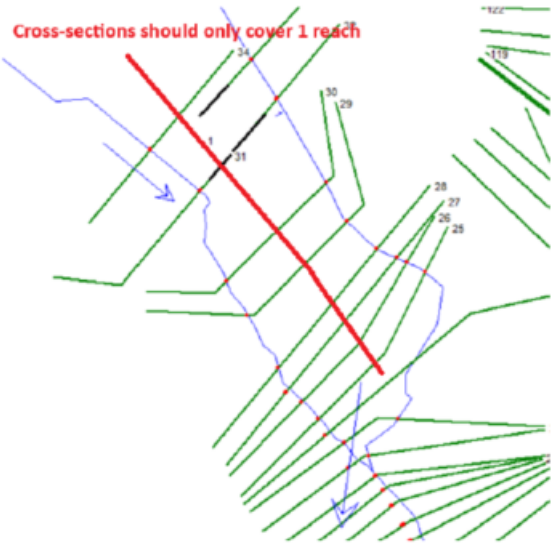
#	Comment	Responsibility	Response
County of Grey			
1.	Staff understand that the proponent will submit a draft plan of condominium application at a future date. The County is the approval authority for plans of subdivisions, part lot control, plans of condominium and condominium exemption. Generally, the condominium or subdivision application is submitted and reviewed concurrently with any associated Planning Act applications. It is unclear how the proposed plan of condominium will operate on the subject lands, particularly as one of the proposed apartment buildings is intended for rental and that there is a significant portion of the property that will not be developed (i.e. will a future condominium association manage the vacant lands and the rental building? Will the undeveloped portion of the property ultimately become a separately conveyable parcel? Etc.) Staff request further information be provided as it relates to the future condominium application, such as a concept draft plan of condominium, to assist in the review of the applications.	Owner/ IPS	The development is now proposed to be fully purpose-built rental, so no Draft Plan of Condominium will be necessary.
2.	Per the submitted PJR, staff understand that that the proposed development will be located on the front portion of the subject lands providing a separation between the proposed residential use and the existing industrial use. However, it remains unclear how the development avoids or minimizes and mitigates potential impacts on the long-term economic viability of employment uses within the existing industrial park. There appear to be 3 vacant parcels in the industrial park directly abutting the subject lands and another 5 vacant parcels on the south side of Eco Park Way. The potential impacts of a directly adjacent sensitive land use (the proposed development) on the viability of these lands has	Sonair	The industrial vacant lands on Eco Park Way have been included in the updated Land Use Compatibility Study. It was determined that all vacant industrial lands are beyond 300m from the subject site, which would satisfy PPS 2.8.1.3. Potential impact from Lands in closer proximity that are established have been discussed in the updated Study.

	not been considered. Employment areas shall be protected and preserved for current and futures uses (2.8.2.1). Please provide additional clarity with regard to PPS policy 2.8.1.3.		
3.	Staff understand that the intent of the Future Development designation in the Southgate Official Plan is to restrict development in order not to jeopardize the orderly development of this area. The Future Development designation is also intended to apply until such a time that it is demonstrated that there is need for the additional land. Staff understand that there are a number of active and planned residential proposals in Dundalk. Staff encourage additional market analysis to further support the proposed Official Plan Amendment and residential development. Additional comments should be received from municipal staff in this regard.	IPS	This is addressed in the updated PJR.
4.	Staff note that the D6 assessment has classified the nearby Lystek operation as a Class II facility. This property abuts the subject lands, and the recommended minimum separation distance of 70 meters cannot be met. As a result, the measurements from the property line (Lystek) to the closest sensitive activity (the proposed residential complex) has been used (approx. 620m separation). Staff understand that when separation distance is provided partially or entirely on-site, a site-specific zone exception could be put in place to ensure that any future changes comply with the D6 guidelines. It is also unclear if the vacant lands within the eco-park have been considered. Staff note that the study also indicates that no odor was observed at the Lystek during a site visit in February 2024. Further comments related to the D6 study should be received from municipal staff.	IPS Sonair	Noted regarding the zoning exception. The vacant industrial lands within eco-park have been included in the updated Study.
5.	Per Section 7.2 of the County OP, development and site alteration is not permitted within the floodway portion of a floodplain, and buildings and structures are not generally permitted in the Hazard designation. Advice and approval from the regulating Conservation Authority, in addition to an EIS, is required when development and site alteration is proposed in the Hazard Lands designation. Staff understand that neither GRCA nor County ecology staff were consulted prior to the completion of the EIS dated May 2025. Further clarification should be obtained.	IPS	The development has been updated and no longer encroaches into the Hazard Lands designation.
6.	Further to the above, staff request that a site plan be provided that overlays the development concept, with the hazard and natural heritage features (i.e. the features identified in Schedule A and Appendix B of the County OP, as well as the GRCA-verified wetland boundaries and appropriate setbacks).	Birks	As requested the updated EIS incorporates the GRCA Verified wetland boundary and setbacks.
7.	Per Appendix A of the County Official Plan, the subject lands are located within a Municipal Wellhead Protection Area (WHPA) or Municipal Intake Protection Zones (IPZs). Further review is suggested to assess the risks of the proposed uses to potentially contaminate groundwater or surface water. It is recommended that comments be provided from the local Risk Management Official to determine if any mitigation measures and/or restrictions on site would be warranted to protect local groundwater supplies.	IPS	The Risk Management Office was circulated our submission. They issued a letter indicating that no policies apply to the activities identified in the application. The only provision is that storage of fuel and certain chemicals would require a Risk Management Plan; no such storage is proposed as part of this application.
8.	County Ecology staff have completed a preliminary review of the proposal and EIS submitted to support the application and offer the following comments at this stage: i. In comments dated October 2024, staff indicated that development should be restricted to the portion of the parcel that fronts on Ida Street, west of the wetland/hazard/stream area and an appropriate setback as identified within the EIS. However, the current site plan shows the development encroaching into the wetlands and wetland removal is proposed. Staff are also concerned that this is contrary to GRCA policy and additional comments should be obtained from GRCA. ii. In comments dated October 2024, staff recommend that the consultant contact ecology staff to determine the Terms of Reference for the EIS. A TOR was not circulated to the appropriate authorities (Conservation Authority, County staff) to scope the EIS. iii. It is unclear why the wetland adjacent to the proposed development is not part of the Melancthon Wetland Complex. Details such as the absence of hydrological connectivity and distance threshold, based on the Ontario Wetland Evaluation System, should be	Birks Valdor	i. After discussion with GRCA, the development has been re-designed to avoid the wetlands. ii. Thank you for your comment. While we agree that a TOR was not formally circulated, there are no comments related to additional studies that might have been requested if the TOR had been submitted for consideration. To that end, while we acknowledge that no TOR was formally sent, we might suggest that it would not have changed the outcome of the studies undertaken. iii. Regarding the difference between the east and west wetlands, as outlined in Section 4.2 of the Revised EIS, "The southwestern wetland unit was denoted as an unevaluated wetland and does not appear to be hydrologically connected to Provincially Significant Wetland Units south or east of the

	provided. iv. The EIS proposes removal of 1.1 ha of wetland and watercourse realignment. While the County may consider compensation where the mitigation hierarchy of avoid, minimize and mitigate has been followed, it is unclear if alternatives have been considered. The EIS should provide commentary on why compensation is the most appropriate option based on the mitigation hierarchy, which is premised on ecological considerations. v. The EIS should provide further details on potential impacts as a result of SWM infrastructure. vi. Water balance information should be integrated within the EIS to fully determine potential impacts and appropriate mitigation for wetlands as a result of proposed dewatering		subject property. For the purpose of the Revised EIS, the southwestern wetland unit is still considered 'other wetlands' given that it remains hydrologically separated from the wetlands to the northeast." iv. After discussion with GRCA, the development has been redesigned to avoid the wetlands. v. The SWM infrastructure is accounted for in the Figure 3 within the Revised EIS vi. Thank you for your comment. While we respect that Water balance or subsurface hydrology are important, and we understand these studies, Birks NHC does not maintain staff that can undertake a water balance. As a result, we rely on separate studies, authored and signed by relevant professionals, referenced within our report for those details. To that end, the potential impacts to the adjacent wetland have been considered in coordination with those professionals and appropriate mitigation has been considered.
9.	County Transportation Services noted that no large traffic impact is expected on the County road and staff have no concerns.	Paradigm	No response needed.
10.	Children's Services (social services) have reviewed the proposal and have no concerns.	N/A	No response needed.
11.	Staff note that a Stage 3 Archeological Assessment is required. Has this assessment been completed? If so, kindly submit the report. It is also unclear if any local first Nations and/or Metis communities have been consulted for this development proposal. Please provide additional details as to how our Indigenous partners have been consulted.	Earthworks Archaeology	The Stage 3 is included with this submission. Six Nations of the Grand River was consulted for the Stage 3. All artifacts found on-site were Euro-Canadian.
12.	From a general planning perspective, staff note that the PJR indicates that the project has been designed with pedestrian connections throughout the site, and the draft OPA indicates that the proposal will also promote and support active transportation in the area. However, it is unclear where these connections and active transportation infrastructure is located. Staff note that there is currently no pedestrian or cycling network on Ida Street. Further clarification is required.	IPS Paradigm	The project has been designed with pedestrian connections throughout the site which provide access to the street and to the future rear hiking trails. Although there is currently no pedestrian infrastructure on Ida Street, South Dundalk is expecting a lot of new development and it is likely that streets such as Ida Street will be urbanized as part of this development. The design is future-proofed for when this occurs.
13.	Staff note that the proposed draft OPA document indicates that "the purpose of the Amendment is to amend the land use designation of the lands shown on Schedule 1, attached hereto, from "Future Development" to 'Neighbourhood Area.'" Staff understand that the subject lands are currently designated 'Future Development' and 'Hazard Land' on Map 2 of the Township's Official Plan, and that the proposal also includes the re-designation of a portion of the 'hazard land' designation to 'neighbourhood area'. Additional comments should be received from Township staff.	IPS	The development has been updated and no longer encroaches into the Hazard Lands designation.
Grand River Conservation Authority			
Environmental Impact Study			
14.	GRCA generally does not support development within wetlands or wetland removal. The proposed development must meet GRCA policies regarding Wetlands and Areas of Interference (see section 8.4 in Grand River Conservation Authority Policies for the Administration of the Prohibited Activities, Exemptions and Permits Regulation, in particular policy 8.4.4).	Birks	After discussion with GRCA, the development has been redesigned to avoid the wetlands. A buffer is proposed from the wetlands with varying depths from 5m to over 36m setback from the development limit which is considered to be appropriate for the reasons outlined in the impact assessment of the Revised EIS.
15.	The Environmental Impact Study is required to determine the wetland boundaries and appropriate development setbacks. All site plan drawings must include the GRCA- verified wetland boundaries and appropriate setbacks and demonstrate that development and site alteration will be outside of the wetland and applicable setback.	Birks	A site visit was undertaken with GRCA and the staked wetland is now included on the plans.

16.	Field confirmation of wetland boundaries with GRCA will be required. Wetland boundaries should be pre-staked prior to GRCA arrival on site and the shapefiles of surveyed wetland boundaries provided to GRCA.	Birks	A site visit was undertaken with GRCA and the staked wetland is now included on the plans.
17.	The EIS should indicate how potential impacts to local site perviousness and water balance of adjacent wetland features will be assessed and addressed. If a water balance assessment is being completed under separate cover (e.g. in a separate water balance study or stormwater management report), the relevant results of that report should be incorporated appropriately into the EIS, such that hydrologic impacts to the wetland can be assessed and mitigated. Water balance study protocols, hydroperiod resolution (e.g. monthly), and proposed mitigations should be scoped to the sensitivity of the wetland feature present, and the scale of the developments impact on its hydrology. Additionally, potential temporary impacts that site grading, construction and dewatering activities may have on groundwater and surface flow towards the adjacent wetland should be assessed, with mitigation proposed as needed, in the EIS.	Birks Valdor	A wetland feature water balance has been completed and is included in the FSR/SWM Report.
Watercourse			
18.	GRCA generally does not support the realignment of a watercourse for new development and would only consider this in such cases as where an Environmental Assessment has been done evaluating all alternatives, or for conservation projects. Please see GRCA policy 8.9.16 of GRCA's Policies for the Administration of Ontario Regulation 41/24 for reference. The proposed site design will need to be adjusted as necessary to meet applicable GRCA policies.	Birks	After discussion with GRCA, the development has been redesigned to avoid the watercourse.
Floodplain			
19.	GRCA does not support any development, including fill placement within the One-Zone floodplain, or the use of a cut/fill to support new development in the floodplain. Please see GRCA policy 8.1.27 for reference. A floodplain analysis must identify the floodplain boundaries and demonstrate that all new development will be outside of the existing floodplain. The digital modelling files associated with the floodplain analysis should also be submitted to GRCA for review with each submission.	Valdor	After discussion with GRCA, the development has been redesigned to avoid the floodplain. Cut and fill is no longer proposed.
Hydrology (VO model)			
General Comment			
20.	Please confirm which vertical geodetic datum has been used for the survey (for example, either CGVD28 or CGVD2013). Please ensure that the survey, grading plan, HEC-RAS model, and terrain model are all based on the same vertical datum.	J.D. Barnes Ltd. Valdor	The survey, grading plan, and updated HEC-RAS model are all based on the vertical datum CGVD28.
Hydrologic Modeling			
21.	Please provide detailed information on how the initial abstraction was calculated.	Valdor	The initial abstraction was calculated using land types
22.	The total Hurricane Hazel storm duration is 48 hours (73mm rain in the first 36 hours and 212mm during the last 12 hours of storm duration). Please revise the CN curve infiltration parameters to account for saturated conditions (use CNIII values for the Hurricane Hazel modeling). Alternatively, the full duration of the regional storm (285mm) can be used without revisions of the CN values.	Valdor	The CN has been updated with CNIII values.
23.	Please provide a summary table referencing the VO6 model (flows and catchments/nodes) and indicating how these correspond to the HEC-RAS input flow locations (cross-sections).	Valdor	The corresponding flows at each node have been indicated on Figure 2.
Hydraulics (HEC-RAS Model)			
Model Plan			
24.	There are multiple plans in the HEC-RAS model: Plan 39, Plan 10, and Plan 01 but it is not clear which plans represent existing and proposed conditions. Please confirm if Plan 39 represents the existing conditions as it is linked with the existing conditions geometry. Plan 10 does not have a geometry file associated with it and Plan 01 does not exist. Please clarify which scenario (existing, proposed) each plan is associated with.	Valdor	The HEC-RAS model only has an existing condition as the development has been redesigned to avoid the floodplain. All irrelevant plans have been removed.

Model Rivers and Junction		
25.	The modeled area two distinct rivers, each with three distinct reaches (tributary reach, upstream main reach, downstream main reach). However, these are modeled as four independent reaches and they do not interact. Junctions should be applied at the confluence of the river with the tributary for the two rivers. See figure below for where junctions should be applied and for locations of the different reaches. Figure 1: Model Schematic 	Valdor Junctions have been added to the updated HEC-RAS model.
River 1 - Reach 1 and Reach 1-A		
26.	Cross-sections should only contain the channel for one reach and not extend into another reach. In the current model cross-section for each reach extend to into the adjacent reach. In figure 2 below, a red line has been drawn showing the approximate locations where cross-sections should end. Please correct the model accordingly.	Valdor See comment 28 response.
27.	In the current model, the entire river has been duplicated in in Reach 1 and Reach 1- A. For example, in the current model the culverts at River Stations 9.5 and 3.5 are included in both Reach 1 and Reach 1-A. Please correct the model accordingly.	Valdor The model has been revised accordingly
28.	Each reach should be acting independent of the other reach until they meet at the confluence, unless spill is occurring from one reach into the other. If a spill is occurring then lateral structures should be included to capture the spill and transmit that flow to the other	Valdor The model was set up this way since there is no clearly defined high point between the two reaches, the area acts like a large / wide low point. The model has been revised to include spills using lateral structures. No significant changes were found in the results.

	reach. Please correct the model accordingly. Figure 2- River 1 - Reach 1 and Reach 		
Flows and Downstream Boundary Conditions			
29.	The flows will need to be updated and clarified when the model geometry fixed. In the current model each reach has its own downstream boundary conditions. This means that each reach is acting completely independent of each other. There should only be two downstream boundary conditions, those for River 1 - Lower Reach and River 2 - Lower Reach (naming from Figure 1 above).	Valdor	The model has been revised to connect at the junctions and therefore there are only two boundary conditions at River Reach 1-C and 2-C.
Comments Regarding the Stormwater Management Report			
30.	While we acknowledge that detailed LID designs can be provided during the detailed design phase of the project, water balance calculations and preliminary LID sizing should be submitted at this stage to confirm feasibility.	Valdor	Infiltration trenches have been designed to capture clean roof water from the North and South buildings as forms of LID.
31.	The runoff coefficient of 0.25 used for the pre-development condition may be overestimated, as a value of 0.2 is typically applied for grass or open space areas. Please provide a supporting reference for the selected value.	Valdor	As per comment from Triton Engineering Services Limited, the use of more advanced modelling techniques is preferred for a large site such as this, in lieu of the Rational Method provided. A VO model was used to address stormwater quantity calculations. Therefore the VO parameters no longer use a RC of 0.25, but calculations % impervious using weighted areas. Please refer to Table E.1 for summary of VO model parameters.
32.	A time of concentration of 10 minutes should not be applied to pre-development conditions. Instead, it should be calculated using an appropriate method—such as the Airport Method (or any other applicable method), which is typically used when the runoff coefficient (C) is less than 0.4.	Valdor	As per comment from Triton Engineering Services Limited, the use of more advanced modelling techniques is preferred for a large site such as this, in lieu of the Rational Method provided. A VO model was used to address stormwater quantity calculations. Therefore the VO parameters no longer use a 10 minute time of concentration for existing conditions. Please refer to Table E.1 for summary of VO model parameters in which Tpeak is calculated using the airport method.
33.	Please confirm whether the bottom elevation of the proposed SWM tank is situated above the seasonal high groundwater table.	Valdor	The proposed SWM tank will be lined with a liner as it is situated above the seasonal high groundwater table.
34.	The submitted SWM calculations indicate that the required storage volume can be accommodated within the proposed underground system. To confirm the actual storage capacity, please provide detailed drawings and technical documentation from the	Valdor	The proposed SWM tank will be in the form of Greenstorm storage modules. Sizing details can be found on DWG. FSP-1.

	storage tank manufacturer. Please note that this can be done during the detailed design stage.		
GRCA Review Fee			
35.	Consistent with GRCA's 2023-2025 approved fee schedule, this application is considered a 'major' zoning by-law amendment and official plan amendment application, and the applicant will be invoiced in the amount of \$2,500.00 for the GRCA's review of these applications. Additional fees would be required for a GRCA permit application for any works proposed within the regulated areas.	Briarwood Homes IPS	Acknowledged. Please forward the invoice to Briarwood Homes and CC IPS.
Grey Bruce Public Health			
36.	Grey Bruce Public Health commends the proponent for considering higher density housing options, green space, gravel walking path and courtyard space in the site plans. Grey Bruce Public Health would highly recommend including affordable housing options in the development plans to provide economic growth and social inclusion.	Briarwood Homes	Affordable housing is not proposed at this time as it is still very early in the process. The housing typology will be more affordable than what has traditionally been built in Dundalk.
37.	We commend the proposed development for including components from the Healthy Development Checklist, developed by Grey Bruce Public Health and endorsed by Grey and Bruce County. We strongly encourage both developers and planners on this project to incorporate the proposed features outlined in the planning rationale document: • "The development will provide residential space with a private public space that has adequate tree cover for passive recreation" and "The site provides adequate provisions for shade and protection from sun exposure." In addition to shade and tree coverage, we also recommend preserving the natural heritage system by maintaining existing trees, soil integrity and landscaping using native species. • "This amenity area will be age friendly and accessible by providing efficient access that promotes safety and provides site furnishing." We would further recommend that units support aging in place, by exhibiting no-step entrances and single floor living amenities. • "The project proposes possible trails in the rear portion of the property which provide opportunities for active recreation. Depending on the site conditions, the trails may be able to connect to other parts of the Dundalk community such as nearby schools and employment lands." In addition to providing transportation linkages, we would also recommend the inclusion of traffic calming measures to promote active transportation which are outlined below.	IPS Adesso Briarwood Homes S&C Architects Inc. Paradigm	• The project will involve the preservation of the vast majority of the subject lands, preserving the natural heritage system by maintaining existing trees and soil integrity. There is a proposed outdoor amenity area that features shade trees and various seating opportunities. The plan is to use native species in the landscaping. • The project is designed to modern OADA code and includes no-step entrances to all units. The buildings are also equipped with elevators. • Traffic calming measures will be considered – raised crosswalks & speed humps.
Transportation and Injury Prevention			
38.	To promote pedestrian safety and active transportation within the development, we highly commend the proposed installation of bike racks, sidewalks, and pedestrian crosswalks. Grey Bruce Public Health would recommend additional pedestrian and cycling safety measures such as sidewalks with sufficient grading along Ida Street, bicycle lanes, bike racks at all four buildings, and access from the development to local amenities such as the County Rail Trail, nearby Eco Park and Elementary school to foster opportunities for active transportation. Additionally, reduced speed limits and traffic calming measures, such as speed bumps/humps and pedestrian crossovers for children and older adults to safely cross roadways to the courtyard amenities, would also help to prevent injuries. The elements of complete street design are important for building active communities by reducing automobile dependency and encouraging active forms of transportation. We would advise proponents for the project implement recommendations from within the Grey Bruce Complete Streets Guide. Grey Bruce Public Health also recommends additional accessible parking spaces given this development targets older adults	Briarwood Homes Paradigm Adesso S&C Architects Inc.	• Sidewalks will be installed directly in front of the property on Ida Street. The development also includes pedestrian connections throughout and to the undeveloped portion of the property to facilitate a future trail network which could connect to the rest of Dundalk and the County Rail Trail. • Short-term bike racks and long-term bike storage are shown on the site plan. • Traffic calming measures will be considered for the site. • Further details will be provided at detailed design.
39.	We recommend reviewing the elements of Age-Friendly Communities to ensure outdoor spaces are designed to be accessible to a wide array of ages and mobility levels. For	Briarwood Homes S&C Architects Inc.	The project includes accessible ground floor units with private outdoor space and bench seating throughout the amenity area.

	example, including accessible ground floor units with private outdoor space, bench seating along the sidewalks and in common areas, such as the communal open space or open green spaces, will make outdoor spaces more useable and safer for residents with reduced mobility. Also, adequate lighting should be installed in the open green space, on community buildings, in parking areas, the gravel trail, and along the sidewalks/roadways to ensure safety.	Adesso	The plans are still in a preliminary stage and lighting plans have not yet been prepared. However, these recommendations will be reviewed and incorporated where appropriate during detailed design.
Healthy Environments			
40.	Community design can greatly influence the wellbeing of residents. Physical and mental health can be promoted by providing opportunities to engage in green space, physical activity, and positive social interactions. Neighbourhood aesthetics, influenced by elements like landscaping, proper indoor waste and recycling storage, and street furniture, can also help to support mental health and wellbeing. Thus, we commend the inclusion of landscaping and shade trees in the site plans, particularly along the development road and in the communal courtyard space. We do note concern relating to buffer distances from the municipal wastewater treatment facility and other facilities located within the Eco Park. Although nuisance odours do not constitute a health hazard, they can impact on the quality of life of residents.	Sonair IPS	Noted.
41.	Climate change is impacting the health of communities through the means of more extreme heat days, precipitation, and extreme weather events which put people at risk of illness and death. We commend the inclusion of natural and built shade structures in the courtyard area, as these protect residents from heat and sun and to facilitate social cohesion and time outdoors. Features that reduce air pollution, water pollution, and urban heat islands, including porous and light-coloured pavement materials and planting trees and shrubs should also be considered due to the co-benefits for human and environmental health. We do note that the development would require the re-alignment of a watercourse, and that there is potential concern about development within hazard areas. Additionally there appears to be limited information on a stormwater management plan. Given that climate change is expected to increase both the frequency of storm events and quantity of precipitation, we would recommend that additional thought be given to these issues.	Valdor	The development has been redesigned and no longer requires re-alignment of the watercourse or development on Hazard Lands. The FSR has been updated to provided additional information on the SWM system which includes quantity control, quality control and water balance.
Potential Groundwater Impact			
42.	Grey Bruce Public Health notes concern with the development's underground parking in an area below the groundwater table. This requires dewatering during construction phase and may also require dewatering once the property is developed introducing the possibility of groundwater seepage and/or flooding. Water ingress is a leading cause of mold issues in residential settings. Additionally, we would highlight the risk of injury to residents if there were a flash flood or significant groundwater seepage. It is also understood that the site location is both an area of significant groundwater recharge, and is in the municipal wellhead protection area. We would recommend that input be sought from the risk management official of the drinking water source protection committee relating to the wellhead protection zone. We would also suggest that additional consideration be given to the seemingly complex and linked stormwater and groundwater issues of this site. To reduce any likelihood of adverse impacts to the development and groundwater we recommend adopting the recommendations of the Hydrogeological Assessment Report.	Soils Engineering Ltd. Valdor S&C Architects Inc.	The development has been redesigned and no longer includes underground parking. The Risk Management Office was circulated our submission. They issued a letter indicating that no policies apply to the activities identified in the application. The only provision is that storage of fuel and certain chemicals would require a Risk Management Plan; no such storage is proposed as part of this application. The FSR has been updated to provided additional information on the water balance and groundwater.
Historic Saugeen Metis			
43.	HSM recommends that the 30m setback of the unnamed Grand River tributary should be maintained and that no development should occur within the wetland. Natural habitat can't simply be replaced through compensation measures and impacts on these important areas should be avoided rather than mitigated.	Birks S&C Architects Inc.	The development has been redesigned and now has a greater than 30m setback from the tributary of the Grand River.

44.	HSM supports the implementation of Low-Impact Development stormwater management features	Valdor	Infiltration trenches have been designed to capture clean roof water from the two buildings as forms of LID.
45.	HSM recommends the planting of native species and recommends native meadows rather than turf grass where possible, to enhance biodiversity and soil health.	Adesso	Acknowledged. A native meadow seed mix will be proposed where possible.
Risk Management			
46.	No policies apply to the activities identified in the application, under the approved Source Protection Plan for the Saugeen, Grey Sauble, Northern Bruce Peninsula Source Protection Region (effective July 1, 2016). However, it is important to note that the property is located within the Wellhead Protection Area B for the Dundalk Well Supply System, whereby the storage of fuel and certain chemicals (e.g. de-greasers, wood strippers, etc.) in quantities greater than 25 litres would require a Risk Management Plan.	Soils Engineering Ltd. Valdor	Noted.
SNGREC (Six Nations of the Grand River Elected Council)			
47.	SNGREC believes this development is not worth the removal of a portion of this wetland as there is plenty of land outside of the wetland that could be developed instead of encroaching into the wetland. Regardless of PSW or evaluated status, common or rare species, SNGREC believes wetlands are worth protection, and development should be designed following the mitigation hierarchy. This means avoidance comes first and compensation comes as a last resort.	IPS	The development has been redesigned and no longer encroaches into the wetland.
48.	SNGREC requests that this development be altered to not encroach on the wetland, and follow the following requests before approval is reconsidered.	IPS	The development has been redesigned and no longer encroaches into the wetland.
Wetland Removal and Buffers			
49.	SNGREC requests a 41m buffer from wetlands to protect habitat function and water quality. The current state of intending to build within the wetland would result in no buffer from the wetland. This would also have insufficient buffers for the watercourse as SNGREC requests 30m buffers from watercourses. These buffers are based on Beacon Environmental's 2012 Buffer Guideline Review document (specifically table 7 on page 88 summarizes the effectiveness of different buffer sizes). Further, the indicated watercourse on the flood plain site plan does not reflect what is seen on 2025 satellite view as a watercourse additionally heads E-W closer to the site.	Birks	As previously discussed, no work is proposed in the wetlands, nor is any work being proposed within 30 meters of the watercourse. While the buffer is limited surrounding the wetland, appropriate mitigation measures are being considered to ensure that no impacts will result to the retained wetland.
50.	On top of the large negative direct impacts, developing this close could increase the cost of development (greater potential or unexpected costs), make the residents experience more annoying insects, and make water taking more detrimental to the environment. The underground car park built right to the back of the site, closest to the wetland, is inadvisable.	IPS	The development has been redesigned and no longer includes underground parking.
51.	Should this development continue as planned, SNGRC will require a meeting with the proponent and financial accommodation, as well as a 3:1 areal replacement of wetlands if built onsite, or 4:1 areal replacement if offsite. This means 3-4x the size of what is removed. This somewhat compensates for the lag time to become a functional wetland, the years of development of the wetland, and possibility of a constructed wetland not being successful or functional. SNGRC also requires that wetland compensation is paired with a monitoring and contingency plan to prevent failure of the wetland.	IPS Briarwood Homes Birks	The development has been redesigned and no longer encroaches into the wetland.
Landscaping			
52.	SNGREC requests that all species used in landscaping and compensation on this site are native species. Please provide the list of landscaping species to SNGREC for review before procurement begins.	Adesso	Specific plant species will be determined after the zoning stage. Native species will be prioritized

Tree Removal and Compensation			
53.	SNGREC requests a 10:1 tree replacement ratio or all trees removed regardless of DBH and 1:1 for any dead trees/snags removed as these are an important habitat feature. A high tree replacement ratio helps to restore lost ecological function and considers time or regrowth and reduced survivability due to deer browsing and tree die-off. The goal of an increased tree replacement ratio is also to create habitat and strengthen ecological resilience. Most city/regional tree compensation requirements are insufficient as they are bare minimum settler perspectives that do not take into account the indigenous perspective and obligation to protect and enhance the natural environment. SNGREC expects that compensation includes estimates for past clearing events that occurred on site to prepare the site.	Briarwood Homes	A Tree Inventory and Preservation Plan has not yet been prepared for this project. We will address this comment at detailed design.
54.	Further, the higher tree replacement ratio better compensates for the long lasting, permanent impact of the development that will no longer be able to be used by Indigenous people. The removal of or damage to the natural environment has an immense negative impact to Six Nations of the Grand River Aboriginal and Treaty Rights in this area. Planting additional trees and improving the environment helps make up for the negative impacts from development on these rights.	Birks	Noted.
55.	Planted trees must be site-specific native species and should be planted as close to the site as possible without impacting existing natural features and ecosystems, as should any future landscaping species be native species.	Adesso	Specific plant species will be determined after the zoning stage. Native species for trees will be prioritized.
56.	Has the proponent considered planting plugs or other earlier-growth trees to help increase the feasibility of planting additional trees? SNGREC requires planting best practices as used and suggest collaboration with Kayanase Plant Nursery for recommendations and guidance	Adesso	This will be explored at detailed design when a more detailed landscape plan is prepared.
57.	Please be advised, if tree offset is not feasible onsite, SNGREC expects offset plantings to take place as close as reasonably possible to the impacted site. SNGREC encourages collaboration with the Grand River Conservation Authority, Saugeen Valley Conservation Authority, or the Township of Southgate to achieve these offset plantings. Lately, the Six Nations of the Grand River Environmental Levy may be considered should closer sites be unavailable. SNGREC expects that the tree replacement is paired with a robust and complete monitoring and maintenance plan complete with contingency action to ensure successful establishment of the trees for long term success.	Briarwood Homes	Noted. This will be discussed further at detailed design.
Triton Engineering Services Limited			
General			
58.	Fisheries and Oceans Canada (DFO) comments and permit (as applicable) are to be provided for Township record once available.	Birks Valdor Briarwood Homes	Given that no work will be required in fish habitat there is no expectation that a DFO review will be required. If a DFO permit is required, it will be completed at site application stage.
59.	Grand River Conservation Authority (GRCA) comments and permit (as applicable) are to be provided for Township record once available.	Valdor Briarwood Homes	GRCA comments are included in this matrix. An application for a GRCA permit will come later in the development process.
60.	Compensation plan as discussed within Section 6.3 the Environmental Impact Study (EIS) is to be provided for Township review.	Birks	Given that wetland encroachment and development in the floodplain is no longer being considered, a Compensation Plan will not be necessary. Avoidance and Mitigation are expected to be sufficient to protect the wetland.
61.	The findings of the additional boreholes as discussed within Section 6.0 of the Geotechnical Report are to be provided for Township review.	Soils Engineering Ltd.	Noted. Additional boreholes will be carried out once the design of the development has been finalized.
62.	Typical commercial entrances, complete with stop signs, are to be provided where the proposed entrances connect to Ida Street.	Paradigm	Noted. Further details will be provided at detailed design.
63.	The east side of Ida Street is to be brought to an urban standard along the Development frontage and up to Victoria Street to provide safe access and pedestrian connectivity to the proposed development. The details of this urbanization are to be discussed further.	Paradigm Briarwood Homes	The urbanization of Ida Street in front of our property can be part of the development of this property. Further details will be provided at detailed design.

Functional Servicing Report			
64.	Ensure the latest Municipal Servicing Standards (MSS) dated June 2022 have been referenced. We note that an older version is discussed within Section 7.0 of the Functional Servicing Report.	Valdor	Section 7.0 has been updated to reflect the latest standards.
65.	Multiple watermain connections into a single property are not acceptable. Revise the design and associated calculations accordingly.	Valdor	The Functional Servicing Plan has been revised to indicate a single water service connection to the property.
66.	All design parameters and calculations are to be as per the MSS and/or Ministry of Environment Design Criteria. (i.e., Maximum Day Demand Factor, Peak Hour Factor and Minimum Hour Factor for water demand are to be 2.5, 3.75 and 0.45 to align with MECP standards). Revise accordingly.	Valdor	The water calculations have been updated.
67.	Existing watermain on Ida Street is 200mm diameter. Ensure information shown within the Functional Servicing Report is correct and consistent (i.e., Section 2.2 indicates 250mm).	Valdor	The watermain diameter has been clarified in the report and plans.
68.	Provide details for watermain, sanitary and storm infrastructure crossings to ensure sufficient separation is provided.	Valdor	The sewer/watermain crossings will be provided at the detailed engineering design stage.
Stormwater Management			
69.	Provide a sectional view of the stormwater management control structures MH.7, MH.9 and the outlet showing proposed orifice(s), sewers and the ponding elevations.	Valdor	A section view will be provided at the site plan application stage.
70.	An impermeable liner is to be provided surrounding the proposed stormwater storage tank to separate high groundwater infiltration and/or exfiltration of run-off collected from parking/driving areas.	Valdor	An impermeable liner will be provided surrounding the proposed stormwater storage tank and detention storage area to separate the high groundwater levels.
71.	Indicate Catchment 101, as mentioned in Tables E3-A to F, within the post development drainage area map.	Valdor	Catchment 101 has been indicated in Figure 4.
72.	Provide detailed calculations confirming how the high-water level elevations were determined for the different rainfall events. Note: The use of more advanced modelling techniques (MIDUSS, VO OTTHYMO) is preferred for a large site such as this, in lieu of the Rational Method provided.	Valdor	A VO model was used to address stormwater quantity calculations.
73.	Provide additional details for all proposed storm infrastructure (i.e. material, invert, sewer length slope etc.) on all applicable drawings.	Valdor	Please refer to FSP-1 for additional details.
74.	Provide Storm Sewer Design Sheets for the 5-year event.	Valdor	A preliminary storm sewer design sheet has been added to the FSR/SWM Report.
75.	Confirm the size of the downstream storm sewer from control MH.7. This is larger than the upstream sewers, however that structure will be restricting flows.	Valdor	The development has been redesigned and therefore MH.7 is no longer applicable.
76.	Indicate major overland flow routes in pre-development drainage area map and update legend accordingly.	Valdor	Please refer to Figure 4 and Figure 5.
77.	A major overland flow route assessment and inlet capacity assessment is to be provided that addresses the requirements of Section 5.1.7 of the new "Design Criteria for Sanitary Sewers, Storm Sewers and Forcemains for Alterations Authorized under Environmental Compliance Approval". It is our expectation that the maximum depths of flows at the surface and maximum hydraulic grade lines in the Storm Sewers will be verified for up to the 100-year design storm.	Valdor	The major overland flow route assessment and inlet capacity assessment will be dealt with at the site plan application stage.
78.	Details (drawings, sizing etc.) regarding the proposed "StormTank" manufactured by Brentwood Industries are to be provided.	Valdor	The Greenstorm product manual has been provided in Appendix E. Please refer to sizing details on DWG FSP-1.
79.	Confirm Table: E1 headings; they indicate "POST" however they appear to be the pre-development conditions.	Valdor	A VO model was used to address stormwater quantity calculations. Please refer to Tables E.1 to E.4.
80.	Provide the design details of the "enhanced grass swale" as this site is within a Significant Groundwater Recharge Area.	Valdor	The development has been redesigned, and the enhanced grass swale is no longer proposed.
81.	Confirm a typical foundation tile system is sufficient to effectively reduce the high groundwater elevation surrounding and below the proposed below-grade parking	Valdor	The proposed buildings will be slab-on-grade, no basement. Therefore weeping tile and groundwater discharge are not required.

	structure. Additionally, confirm how groundwater will be controlled from entering the structure in the event of a prolonged power outage.		
82.	The Functional Servicing Report is to be revised to discuss the available reserve capacity of the municipal water supply, storage, or wastewater treatment systems. This is to be completed in reference to the latest Reserve Capacity Calculations. This is to include, but not limited to the following: - Quantify the number of ERUs required for the proposed development. - Confirm that sufficient reserve capacity is available in the water and wastewater systems; and - Provide specific reference to the Township's Servicing Capacity Allocation & Retention Policy (Development Policy D-8), including how the proposal aligns with the policy's requirements for allocation and retention of servicing capacity.	Valdor	Reserve Capacity has been addressed in the FSR/SWM Report.
Archaeological Study			
83.	Provide the recommended Stage 3 site-specific assessment of the Kerr (BaHc-3) as specified.	Earthworks Archaeology	The Stage 3 is included with this submission.
84.	Provide a letter confirming that the MTCS is satisfied, as discussed within the Archaeological Report.	Earthworks Archaeology	The Stage 3 has been submitted to MTCS. We will forward the approval letter once it is ready.
Traffic Impact Study			
85.	The TIS is to assess the operational impacts at the Ida Street and Eco Parkway intersection, and the future intersection of Eco Parkway and Highway 10, as contemplated in the previous completed Municipal Class EA and the Eco Park Subdivision draft plan. Please refer to the Township's Planning Applications and Public Notices website.	Paradigm	As shown in the Class EA for the Eco Parkway Extension, the road network planned as part of the Eco Parkway Extension and development of surrounding lands is not a direct connection to Highway 10, as it would wind through the planned industrial development. Residents of the Briarwood residential development travelling south on Highway 10 would likely use 260 Sideroad, Dufferin Road 17 or travel directly to Highway 89, as these are more convenient and less circuitous routes. Based on this, and given the reduction in trip generation and assignment as a result of the updated development concept, development trips travelling to/from Highway 10 via the Eco Parkway Extension would likely be minimal. It is also noted that the Township and County were contacted prior to preparing the January 2025 TIS. Neither the County nor Township requested additional study area intersections from the scope of work proposed. This correspondence was appended to the January 2025 TIS. Appendix C of the TIS Addendum contains this information again for ease of reference.
86.	Include an evaluation of pedestrian connectivity, including safe and direct access to and from the site to the downtown businesses and schools. This is to consider sidewalk continuity, and crossings at key intersections and completed in the context and reference to how it is in alignment with the Southgate Official Plan	Paradigm	The development is proposing pedestrian connections throughout the site including internal walkways and crosswalks, and connections to the undeveloped portion of the property to the east to facilitate a future trail network. The developer will work with neighbouring property owners to create connections to the rest of Dundalk and the Grey County Rail Trail. The developer intends to urbanize Ida Street along the frontage of the site including installing sidewalks with connections to the internal walkways.

			Although there is currently no pedestrian infrastructure on Ida Street, the development is designed to provide appropriate pedestrian connections if the roadway is urbanized in the future.
Township of Southgate Public Works, Roads & Waste			
87.	Can safe access be provided? Yes Road Drainage Concern: None Road Standard: Urban Asphalt Road Widening Necessary? No Entrance Requirements: Paved Commercial Entrance Required with Stop Sign Load Restricted Road: No Comments: Current gravel residential entrance permit taken out in 2021, has not been given final approval.	Paradigm Briarwood Homes	Noted. No response needed at this time.
Enbridge Gas			
88.	Enbridge Gas does not object to the proposed application(s) however, we reserve the right to amend or remove development conditions. This response does not signify an approval for the site/development.	N/A	No response needed.
Bruce-Grey Catholic District School Baord			
89.	The BGCDSB does not currently operate any schools in Dundalk, and the nearest Catholic elementary school is located in Durham, approximately 35 km away. The closest secondary school is in Owen Sound, more than 60 km from Dundalk. These distances create a substantial service gap for families in Southgate seeking access to Catholic education. To address this gap, the BGCDSB is actively pursuing the identification of a suitable school site in Dundalk to support future student accommodation. The Board's goal is to establish a local Catholic elementary school and, in time, explore potential opportunities for secondary programming to better serve the community. The site within this particular development has been determined unsuitable for a school due to its limited size and environmental constraints. BGCDSB will continue to monitor growth, review development applications, and work with municipal partners to identify and secure a viable site in Dundalk.	Briarwood Homes	Noted.
90.	Due to concerns associated with school accommodation, the Bruce Grey Catholic District School Board wishes to advise that should the development proceed to the satisfaction of the municipality, that the attached clauses be included in the municipal conditions of approval and subsequently within any agreements of purchase and sale for the proposed units of this plan. Please also refer to the attached sign specifications for the Bruce Grey Catholic District School Boards' development-site signage requirements.	Briarwood Homes	Noted.
Bluewater District School Board			
91.	BWDSB is experiencing enrolment pressures in Southgate and is currently constructing a new elementary school in Dundalk to accommodate the community's growing student population. In the interim, the Board has implemented short-term accommodation measures, including redirecting existing Grade 7 and 8 students in Dundalk schools to Grey Highlands Secondary School in Flesherton, where capacity is available. In addition, through the use of holding zones, students from new residential developments are being directed to Macphail Memorial Elementary School, also in Flesherton. These strategies will remain in place until the new Dundalk elementary school is completed and operational.	Briarwood Homes	Noted.
92.	Looking ahead, BWDSB anticipates the need for an additional elementary school site in Dundalk as Southgate's population continues to grow. However, the site within this	Briarwood Homes	Noted.

	particular development has been determined unsuitable for a future school due to its limited size and environmental constraints. The Board will continue to monitor enrolment trends, assess development applications as they are received, and provide comments on school site requirements where appropriate.		
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