

COMMENT RESPONSE MATRIX
476420 3rd Line, Chipwoods Park (Sheldon Creek Developments)
Township of Melancthon, Dufferin County (COPA 2-25)
Comments Dated: November 2025
Responses Dated: July 2026

AGENCY/ DEPT	REVIEWER	COMMENTS/CONDITIONS	RESPONSE
Building Services Dufferin County	Kristina Millar 519.941.2816 x2710 kmillar@dufferincounty.ca	Building permits will be required for all structures as defined in the Building Code Act and the Ontario Building Code.	Acknowledged.
Information Technology Dufferin County	Eric Carr Phone: 519-941-2816 Ext. 8007 ecarr@dufferincounty.ca	We request that all streets in the proposed development be given unique names that do not duplicate or conflict with existing road names within Dufferin County, unless it is the continuation of an existing road. This includes names with similar spelling or pronunciation (ex. "Rogers" and "Rodgers", "Forrestview" and "Forestvue"). Road names cannot contain any punctuation or special characters such as apostrophes - ' or ampersands - &, etc.). Personal names should be highly discouraged for road names, including people of historical significance and current or former military personnel. In addition, parseable names with commonly used road name prefixes, suffixes or directions should not be used (ex. Courtney, Eastwood, Broadview).	Acknowledged and to be addressed in future planning stages, local Official Plan and Zoning By-law Amendments, Site Plan Approval applications are forthcoming.
Information Technology Dufferin County	Eric Carr Phone: 519-941-2816 Ext. 8007 ecarr@dufferincounty.ca	All addressing should be compliant with Bell Canada's 9-1-1 system and Next Generation (NG9- 1-1) standards. In accordance with Bell Canada's 9-1-1 system, all addresses assigned to these streets should increase consecutively in the same direction by the same interval (2s or 4s) and consist of addressing parity of even numbers (i.e. 2,4,6,...) on one side of the road and odd numbers (i.e. 1,3,5,...) on the other side of the road.	Acknowledged and to be addressed in future planning stages, local Official Plan and Zoning By-law Amendments, Site Plan Approval applications are forthcoming.
Information Technology Dufferin County	Eric Carr Phone: 519-941-2816 Ext. 8007 ecarr@dufferincounty.ca	Both the proposed and final subdivision/site plans should be provided to Dufferin County. Proposed/approved road names should be clearly labeled on roadways and proposed/approved addresses should be clearly labeled on each lot on the plans which should be of sufficient quality and resolution.	Acknowledged and to be addressed in future planning stages, local Official Plan and Zoning By-law Amendments, Site Plan Approval applications are forthcoming. Unit numbers and road names are shown on the Development Concept Plan in the interim.
Information Technology Dufferin County	Eric Carr Phone: 519-941-2816 Ext. 8007 ecarr@dufferincounty.ca	Proper intersection signage with road names and address ranges should be posted, including temporary intersection signage during construction. Additionally, address numbers should be posted as soon as possible on each lot for emergency response purposes and to aid in the building inspection process during construction. Please note that emergency services cannot be dispatched to Lot and Plan number in the case of a construction-related injury.	Acknowledged and to be addressed in future planning stages, local Official Plan and Zoning By-law Amendments, Site Plan Approval applications are forthcoming.

Planning Division Dufferin County	Aneil Sihota 519 939 3453 asihota@dufferincounty.ca	County planning staff has, however, not received comments from the following external agencies, though they were circulated the materials as part of the application review process. • Archaeological Impact Assessment (AIA) Peer Review • Beausoleil First Nation • Bell Canada • Chippewas of Rama First Nation • Conseil Scolaire Catholique MonAvenir School Board • Conseil Scolaire Viamonde School Board • Dufferin Federation of Agriculture (DFA) • Haudenosaunee Development Institute (HDI) • Hydro One • Metis Nation of Ontario • Ministry of Municipal Affairs and Housing (MMAH) • Nottawasaga Valley Conservation Authority (NVCA) • Natural Resources Information Support Centre • Ontario Federation of Agriculture (OFA) • Rogers Telecommunications • Upper Grand Valley District School Board (UGDSB)	Acknowledged. We understand that all relevant comments have been received.
Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	<u>Planning Justification Report</u> Page 40 of the Planning Justification Report ('PJR') states that Dufferin County has a population target of 99,000 people and an employment target of 40,700 jobs. The County Official Plan establishes a population target of 100,700 people and employment target of 40,900 jobs. These values should be revised to accurately reflect the projected targets outlined in the Dufferin Official Plan.	PJR updated per comment.
Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	In the last paragraph on page 40, it is outlined that the proposed development will provide 224 new affordable homes over a 5-year period, which is close to the entire residential dwelling demand (227) required for Melancton until 2051, as identified in the County's most recently completed Land Needs Assessment (LNA). The County does have concerns with maximizing the Township's projected residential demand to 2051 for a development that proposes the establishment of a new settlement area and not the expansion of an existing settlement area. This fact is also concerning because section 3.0 of the County Official Plan explicitly states that "the majority of future growth will be directed to urban settlement areas with full municipal services, and to a lesser extent to the community settlement areas that can accommodate additional growth". This proposed development directly contradicts this assertion.	Refer to revised PJR for discussion of residential growth. PJR updated per discussion with Planning Staff through working meetings in Jan-Mar 2026. See updated Planning Justification Report and Scoped Planning Comment Response Letter submitted May, 2026, included with this resubmission.

Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	In the analysis conducted on pages 48-60, the applicant planner determines that all policies of the Provincial Planning Statement, 2024 ('PPS, 2024') have been conformed to. Through our review, questions still remain with respect to section 2.3.2 of the PPS, 2024, specifically that of subsections b) and g), which are outlined below for reference. As it pertains to subsection b), there is no extensive discussion on whether capacity exists at existing public service facilities, especially local schools. The County would, therefore, request that additional information be provided in the PJR that discusses whether there is capacity at existing public service facilities that could address the additional constraint 224 new residential units would have on the Melancthon and surrounding municipalities. Further, the planning division does not believe that the consultants assertion that the redevelopment is a continuation of an existing residential use provides strong reasoning to addressing subsection g). Further clarification on how this settlement area would represent a phased progression of urban development in Dufferin and the Township of Melancthon is required. o If there is sufficient capacity in existing or planned infrastructure and public service facilities. g) The new or expanded settlement area provides for the phased progression of urban development.	Refer to revised PJR for discussion of PPS section 2.3.2 and phased progression of urban growth. PJR updated per discussion with Planning Staff through working meetings in Jan-Mar 2026.
Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	Further, section 2.3.1.2 of the PPS, 2024 states that "land use patterns within settlement areas should be based on densities and a mix of land uses". In reviewing the proposed concept plan, the mix of land uses is minimal, in fact, the proposed development largely contains residential dwellings. The planning division would suggest that the applicant revise the concept plan to incorporate a greater mix of land uses to address that policy of the PPS, 2024. In addition, subsections c) – e) are minimally discussed in the analysis section provided on page 52. of section 2.3.1.2. The planning division, therefore, requests that additional information be provided on how those subsections are addressed by the proposed development.	Proposed Development updated with commercial uses and greater mix of housing options. Refer to revised PJR for discussion of PPS section 2.3.1.2 and mix of housing/land uses. PJR updated per discussion with Planning Staff through working meetings in Jan-Mar 2026.
Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	Section 2.5.2 of the PPS, 2024, states that "in rural areas, rural settlement areas shall be the focus of growth and development, and their vitality and regeneration shall be promoted". The Township of Melancthon currently has three (3) rural settlement areas and, as such, it is the belief of the planning division for this policy of the PPS, 2024 to be maintained any growth and development should occur in these areas. In our opinion, the establishment of a new settlement area in Melancthon would directly contradict this objective of the PPS, 2024.	Refer to revised PJR for discussion of PPS section 2.5.2. PJR updated per discussion with Planning Staff through working meetings in Jan-Mar 2026.
Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	On page 62 it is stated that "since the updated COP is not in full-force and effect, the text of 2017 Official Plan is applied to assess the proposed amendments". OPA #4, which was the final amendment of the County MCR process, was approved by MMAH on July 31st, 2025, and, therefore, became in-force and effect on that day. With the complete application memorandum being issued on September 11th, 2025, the application is subject to all updates made as part of the MCR process. Please revise the PJR to reflect the updated County Official Plan, 2025.	PJR updated per comment

Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	The proposed development does not reflect a settlement area expansion, as this would require the boundaries of an existing settlement area to be proposed for growth. Given that, section 3.5.1 of the County Official Plan is not applicable to this application being that the application proposes the establishment of a new settlement area. o As it pertains to the establishment of new settlement areas, section 3.3.1, subsection i), of the County Official Plan states that “the establishment of new settlement areas is not permitted by this Plan”.	Refer to revised PJR for discussion of new settlement areas. MMAH modifications of OPA #4 removed section 3.3.1 subsection i). PJR updated per discussion with Planning Staff through working meetings in Jan-Mar 2026.
Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	Under subsection 4.2.3 (prime agricultural areas), which the subject lands are designated as, subsection e) states that “land may only be removed or excluded from prime agricultural areas for expansions of settlement areas in accordance with the policies of this Plan”. The proposed development does not propose an expansion of a settlement area and, instead, proposes the establishment of a new settlement area. This, in turn, means that the application is not in conformance with that policy.	Refer to revised PJR for discussion of new settlement areas. Settlement area policy modified through MMAH approval of OPA #4. PJR updated per discussion with Planning Staff through working meetings in Jan-Mar 2026.
Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	<u>Agricultural Impact Assessment</u> The lands are designated as prime agricultural under the County of Dufferin Official Plan, which is reflective of the land use designation provided by the province under the PPS, 2024. The County would request that section 8.1 of the Agricultural Impact Assessment (‘AIA’) be revised to include discussion on the agricultural policies of the PPS, 2024.	AIA updated per comment.
Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	Section 8.3 of the AIA references section 5.2.1 (e) of the Official Plan relating to legal nonconforming uses for lands designated as agricultural. The subject lands are designated as Rural and Environmental Conservation under the Township Official Plan, and, as such, we want to understand the reason for referencing section 5.2.1 (e).	Reference to 5.2.1(e) and discussion of legal non-conforming has been removed from AIA.
Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	One of the criteria for establishing a new settlement area under the PPS, 2024 is the evaluation of alternative locations. While we can appreciate the consultants determination under section 3.4 of the AIA, the planning division believe an evaluation of prime agricultural lands adjacent to existing settlement areas should be undertaken as a means to further support the argument that this parcel of land is the most appropriate for this type of development. As such, the planning division will request the AIA consultant include an evaluation of alternative locations in their report.	See updated Section 3.4 and new Section 6 - Assessment of Alternative Locations within AIA.
Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	The application was circulated to the Ontario Federation of Agriculture (OFA) and Dufferin Federation of Agriculture (DFA) for their review. While no comments have been received, if any are provided the County will forward them to the applicant.	DFA comments received and responded to below.
Planning Division Dufferin County	Rajbir Sian rsian@dufferincounty.ca	<u>General Comments</u> When does the proponent expect to undertake the Limited Phase II Environmental Site Assessment (ESA) as identified by Crozier in the Phase 1 ESA report?	Phase 1 ESA findings identified areas of potential contamination for further review.. The Phase 2 ESA is anticipated to review these findings in future planning stages after outstanding planning and technical comments are addressed in greater detail.
Engineering Division Dufferin County	Shophan Daniel sdaniel@dufferincounty.ca	The County’s Engineering Division has no comment on this OPA application.	Acknowledged.
Public Works- Waste Services Dufferin County	Chris Fast 519.941.2816 x2623 cfast@dufferincounty.ca	Can you please clarify your proposed waste collection strategy? Will you be using the proposed ‘Garbage Collection’ area for pickup by a private waste collection contractor?	Private waste collection is proposed.

Public Works- Waste Services Dufferin County	Chris Fast 519.941.2816 x2623 cfast@dufferincounty.ca	Based on the 'Garbage Collection' area denoted in the Concept Plan it is assumed that this development will continue with a private waste collection contract currently/previously in use for all waste generated on-site.	Private waste collection is proposed.
Public Works- Waste Services Dufferin County	Chris Fast 519.941.2816 x2623 cfast@dufferincounty.ca	Should the developer want to seek approval for municipal waste collection services, the following should be considered: o We do not collect 'garbage' from communal containers in a communal area. We do not collect from front-end dumpsters or in-ground containers. o If you wish to have Dufferin Waste collect garbage, it would have to be from in front of each individual unit (similar to waste collection in a residential subdivision). o Green bin and recycling services can be offered, upon approval. Collection from in front of each individual unit is preferred, but please confirm your intention.	Acknowledged.
Public Works- Waste Services Dufferin County	Chris Fast 519.941.2816 x2623 cfast@dufferincounty.ca	o The standard criteria to receive waste collection on-site are as follows: ▪ No backing up within the site by waste collection vehicles. A turn-around must be in place (hammerhead, or otherwise). ▪ Turning radii of 5 meters. ▪ Minimum road width of 6m. ▪ Access to collect on both side of the road. ▪ For corner radii and turnaround dimensions, we default to that of the standards for Fire Services vehicles.	Acknowledged.
Public Works- Waste Services Dufferin County	Chris Fast 519.941.2816 x2623 cfast@dufferincounty.ca	Please review our Waste Collection Bylaw and Website for information on the specifics of our program: o http://www.dufferincounty.ca/wp-content/uploads/2024/03/2012-36-Waste-Collection-Consolidated.pdf o https://www.dufferincounty.ca/waste-services/	Acknowledged.
Public Works- Waste Services Dufferin County	Chris Fast 519.941.2816 x2623 cfast@dufferincounty.ca	If approved, waste will be collected at the curb on the municipal right of way, and not onsite. Set out location to be approved by Dufferin Waste.	Acknowledged.
Public Works- Waste Services Dufferin County	Chris Fast 519.941.2816 x2623 cfast@dufferincounty.ca	Consider storage space for an adequate number of waste containers on this property. Containers shall not be stored on municipal property.	Acknowledged and to be refined/addressed in future detailed planning stages.
Public Works- Waste Services Dufferin County	Chris Fast 519.941.2816 x2623 cfast@dufferincounty.ca	The proposed development may opt out of County waste collection services and utilize a private contractor for all waste collection.	Acknowledged.
Canada Post	Anna Burdz anna.burdz@canadapost.ca 647-355-3597	Canada Post has reviewed the proposal for the above noted Development Application and has determined that the completed project will be serviced by centralized mail delivery provided through Canada Post Community Mail Boxes.	Acknowledged.
Canada Post	Anna Burdz anna.burdz@canadapost.ca 647-355-3597	In order to provide mail service to this development, Canada Post requests that the owner/developer comply with the following conditions: - The owner/developer will consult with Canada Post to determine suitable permanent locations for the placement of Community Mailboxes and to indicate these locations on appropriate servicing plans.	Acknowledged and Canada Post conditions to be addressed in future detailed planning stages
Canada Post	Anna Burdz anna.burdz@canadapost.ca 647-355-3597	The Builder/Owner/Developer will confirm to Canada Post that the final secured permanent locations for the Community Mailboxes will not be in conflict with any other utility; including hydro transformers, bell pedestals, cable pedestals, flush to grade communication vaults, landscaping enhancements (tree planting) and bus pads.	Acknowledged.

Canada Post	Anna Burdz anna.burdz@canadapost.ca 647-355-3597	The owner/developer will install concrete pads at each of the Community Mailbox locations as well as any required walkways across the boulevard and any required curb depressions for wheelchair access as per Canada Post's concrete pad specification drawings.	Acknowledged.
Canada Post	Anna Burdz anna.burdz@canadapost.ca 647-355-3597	The owner/developer will agree to prepare and maintain an area of compacted gravel to Canada Post's specifications to serve as a temporary Community Mailbox location. This location will be in a safe area away from construction activity in order that Community Mailboxes may be installed to service addresses that have occupied prior to the pouring of the permanent mailbox pads. This area will be required to be prepared a minimum of 30 days prior to the date of first occupancy.	Acknowledged.
Canada Post	Anna Burdz anna.burdz@canadapost.ca 647-355-3597	The owner/developer will communicate to Canada Post the excavation date for the first foundation (or first phase) as well as the expected date of first occupancy.	Acknowledged.
Canada Post	Anna Burdz anna.burdz@canadapost.ca 647-355-3597	The owner/developer agrees, prior to offering any of the residential units for sale, to place a "Display Map" on the wall of the sales office in a place readily available to the public which indicates the location of all Canada Post Community Mailbox site locations, as approved by Canada Post and the Town of Oakville.	Acknowledged.
Canada Post	Anna Burdz anna.burdz@canadapost.ca 647-355-3597	The owner/developer agrees to include in all offers of purchase and sale a statement, which advises the prospective new home purchaser that mail delivery will be from a designated Community Mailbox, and to include the exact locations (list of lot #s) of each of these Community Mailbox locations; and further, advise any affected homeowners of any established easements granted to Canada Post.	Acknowledged.
Canada Post	Anna Burdz anna.burdz@canadapost.ca 647-355-3597	The owner/developer will be responsible for officially notifying the purchasers of the exact Community Mailbox locations prior to the closing of any home sales with specific clauses in the Purchase offer, on which the homeowners do a sign off.	Acknowledged.
Canada Post	Anna Burdz anna.burdz@canadapost.ca 647-355-3597	Canada Post further requests the owner/developer be notified of the following: 1 The owner/developer of any condominiums will be required to provide signature for a License to Occupy Land agreement and provide winter snow clearance at the Community Mailbox locations 2 Enhanced Community Mailbox Sites with roof structures will require additional documentation as per Canada Post Policy 3 There will be no more than one mail delivery point to each unique address assigned by the Municipality 4 Any existing postal coding may not apply, the owner/developer should contact Canada Post to verify postal codes for the project 5 The complete guide to Canada Post's Delivery Standards can be found at: https://www.canadapost.ca/cpo/mc/assets/pdf/business/standardsmanual_en.pdf The Location of the Local Post Office is 131 First Ave E Shelburne ON	Acknowledged.
Dufferin-Peel Catholic District School Board	Jahnvi Pathak (905) 890-0708, ext. 24161 jahnvi.pathak@dpdcdsb.org	The applicant proposes the development of 224 residential units, which are anticipated to yield: • 22 Junior Kindergarten to Grade 8 Students; and • 7 Grade 9 to Grade 12 Students	Acknowledged.
Dufferin-Peel Catholic District School Board	Jahnvi Pathak (905) 890-0708, ext. 24161 jahnvi.pathak@dpdcdsb.org	The proposed development is located within the following school catchment areas which currently operate under the following student accommodation conditions:	Acknowledged.

Dufferin-Peel Catholic District School Board	Jahnvi Pathak (905) 890-0708, ext. 24161 jahnvi.pathak@dpcdsb.org	Catchment Area	School	Enrolment	Capacity	# of Portables / Temporary Classrooms		Acknowledged.
		Elementary School	St. Benedict CES	492	478	6		
		Secondary School	Robert F. Hall CSS	1592	1314	4		
Dufferin-Peel Catholic District School Board	Jahnvi Pathak (905) 890-0708, ext. 24161 jahnvi.pathak@dpcdsb.org	DPCDSB requests that the following conditions be incorporated in the development agreement: 1. That the applicant shall agree to include the following warning clauses in all offers of purchase and sale of residential lots: (a) "Whereas, despite the best efforts of the Dufferin-Peel Catholic District School Board, sufficient accommodation may not be available for all anticipated students from the area, you are hereby notified that students may be accommodated in temporary facilities and/or bussed to a school outside of the neighbourhood, and further, that students may later be transferred to the neighbourhood school." (b) "That the purchasers agree that for the purpose of transportation to school, the residents of the subdivision shall agree that children will meet the bus on roads presently in existence or at another place designated by the Board." DPCDSB will be reviewing the accommodation conditions in each elementary and secondary planning area on a regular basis and will provide updated comments if necessary.						Acknowledged.
Enbridge Gas	Willie Cornelio Sr Analyst Municipal Planning	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.						Acknowledged.
Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	3.1 Site Investigations <u>Comment #1</u> Section 7.1.2 states that “During the site investigation, potentially suitable snags were observed within woodlands on the property, which included a general screening of the property for snags and snag clusters during the early leaf-out period such that potential cracks, holes, splits, etc. could be viewed by the site investigator.” Please provide a date that the surveys were completed as they are typically done under leaf off conditions, however the report states early leaf out, clarification on this timing is requested. Please confirm if potential suitable snags were counted and assessed						Azimuth's statement in Section 7.1.2 has been corrected (error regarding methodological timing). The general screening did not take place "during early leaf-out", rather this took place during the December 11, 2023 site investigation. This was supplemented where possible by observations made during leaf-on surveys for ELC and vegetation, however the primary screening occurred during the leaf-off season. A high-detail snag survey mapping individual bat snag trees was not completed for the purposes of Azimuth's EIS.

Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	3.2 Wetlands <u>Comment #2</u> As per section 5.3.6 of the Dufferin County OP, “Prior to development or site alteration within or adjacent to any unevaluated wetland an evaluation will be required to determine its significance.” The Azimuth report states, “The wetland delineation was completed by Ontario Wetland Evaluation System (OWES)-certified staff (D. d’Entremont) during appropriate seasonal timing (June and August 2024) based on the most recent provincial criteria (OWES,2022).” However, it is not clear if a wetland evaluation was completed as per OWES and what the results of this evaluation were. Please confirm if an OWES wetland evaluation was completed to determine the significance of the unevaluated wetlands on and adjacent to the subject property, as required by Section 5.3.6 of the Dufferin County OP.	Azimuth completed a wetland delineation only, and did not evaluate the wetland complex through a complete OWES wetland evaluation. In Azimuth’s experience, it is not typical or reasonable for a single-property EIS to be required to complete a full OWES evaluation. The completion of a full Wetland Evaluation under OWES is an extensive process requiring thorough background research and field work, extending to areas well beyond the defined subject lands and adjacent lands, as well as a degree of labour-intensive analysis. Due to the requirement to evaluate adjacent wetland elements beyond their own property, it is not typically incumbent on a landowner to complete an OWES evaluation. As landowners do not own the adjacent lands, they are not assured access for wetland assessment, strongly impeding assessment of the majority of a given wetland complex (such as the one associated with the subject lands). If the results of the wetland evaluation indicate provincial significance - development capability of the adjacent lands are highly constrained. Thus, application of an OWES assessment by a private landowner has the capability of severely negatively impacting neighbor relations, and is not typically expected. Further, despite the magnitude of impact an OWES evaluation would have for the scope of the project, the Township and their Peer Reviewer in 2024 (R.J. Burnside & Associates Ltd) did not request an OWES evaluation as part of their June 18, 2024 Terms of Reference following review of Azimuth’s scope. This is a highly important item which should have been highlighted at the beginning of this project, considering that wetland elements were clearly evident as part of the property makeup at that time. At this point, it is our opinion that it is unreasonable to expand the project scope in such a significant manner. Regardless of the above, per Azimuth’s EIS and EIS update, the proposed development avoids wetland, and is not expected to result in impacts to wetland provided that mitigation is followed. As such, the expectations of the PPS, County OP and Township OP are suitably addressed regardless of the wetland’s specific designation.
Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	<u>Comment #3</u> Section 3.0 of the EIS indicates that a site visit with NVCA to stake the wetland was deferred to summer 2025. Please confirm whether this wetland staking has been completed and if the results are available for review.	As summarized in Azimuth’s updated EIS and updated Figures, Azimuth completed a joint wetland boundary delineation and flagging with the Nottawasaga Valley Conservation Authority (NVCA; Emma Perry in attendance) on August 28 and September 16, 2025, including mapping with sub-metre accuracy GPS technology. While there was a minor degree of wetland boundary shift (as is to be expected during a joint delineation), Azimuth notes that the resulting boundary is similar to the original provided in our 2025 EIS.
Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	3.3 Significant Wildlife Habitat <u>Comment #4</u> The Township of Melancthon’s reviewer specifically requested that raptor nest surveys be conducted in the vicinity of the development (ToR correspondence dated June 18, 2024, item #6). However, Table 6 of the EIS (page 9 of 15) states that “Dedicated stick nest surveys were not completed as a component of the field program.” The rationale provided, that no listed species were observed during breeding bird or marsh bird surveys is insufficient justification for excluding this ToR requirement. The absence of raptor observations during surveys designed for other bird groups does not confirm the absence of nesting raptors, as stick nests are typically identified during leaf-off surveys when they are most visible. Considering that approximately 6 ha of significant woodland are proposed for removal, the omission of these surveys represents a data gap. It is therefore recommended that these surveys be completed during appropriate leaf-off conditions prior to finalization of the EIS to fulfill the ToR requirements and ensure that potential impacts to nesting raptors and their habitat are adequately assessed.	Noted. To address this item, Azimuth has completed a raptor nest survey within the vicinity of development. This survey was completed on April 6, 2026 during leaf-off conditions, and is included within our updated EIS. No raptor nests or raptor nesting activities were observed during the course of the 2026 survey or during the remainder of the field program. The results of this survey strengthen the original EIS conclusions. Azimuth notes that while the Significant Woodland complex does contain interior habitat >100m from edges, there is no woodland interior >200m from all edges within the overall complex (on or off-property); the SWH Criteria Schedule for Ecoregion 6E indicates that this Woodland Raptor Nesting Habitat is most closely associated with woodlands exceeding 10ha of interior >200m from all edges, which would therefore not apply to this property or its associated woodlands. Further, four (4) of the six target species for this SWH category (Broad-winged Hawk, Sharp-shinned Hawk, Goshawk, and Coopers Hawk), including two of the more common species, fledge in July in Ontario, and would be expected to be actively nesting during June breeding bird surveys. However, none were observed during field studies. As such, it is Azimuth’s opinion that our original assessment was based on firm rationale; regardless, there is no evidence to suggest this SWH category occurs within the study area.

Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	<u>Comment #5</u> Table 6 of the EIS indicates that there is no suitable habitat for Amphibian Breeding Habitat (Woodland). However, it is not clear whether vernal pools were observed during field investigations, as the EIS does not comment on their presence or absence within the woodland. In addition, the woodland area proposed for removal was not included in the breeding amphibian surveys, which appear to have been conducted primarily along the roadway and within the central to southern portion of the property (Figure 2 of the EIS). To adequately assess potential impacts to amphibian breeding habitat, surveys should be expanded to cover the entire property, with particular attention to the woodland areas proposed for removal.	Vernal pools and other forms of standing water of the size (i.e. >500m²), depth and permanence (i.e. containing enough water most years until mid-July) necessary to support Amphibian Breeding Habitat (Woodland) as described by the SWH Criteria Schedule for Ecoregion 6E are not present within upland areas within the property, or within wetland areas at the north end of the property. Ephemeral, superficial surface water is seasonally present within some upland woodland vegetation communities during peak melt-mediated surface flooding in April, as noted during the April 6, 2026 vernal pool screening. Typically these surface water elements are small (10-30m²), shallow (frequently approximately 5cm deep, some larger pockets up to 10-15cm deep in centre, numerous areas <5cm deep)), and surface water was not observed to persist into June when other field work was completed (such as 2024 ELC, Vegetation and Dawn Breeding Bird Surveys reviewed this area). These are present in parts of the FOCM4-3 and FOMM8-1, and rarely in the FOMM4-3. Such elements are mediated by the hummocky microtopography of these portions of the subject lands, which trap seasonal surface water for short periods of time. Many of these areas are intermixed with canopy-height upland tree species such as Black Cherry, further suggesting limited permanence. Upland woodland areas were not observed to support features indicative of Amphibian Breeding Habitat (Woodland), including areas proposed for removal. April 6, 2026 surveys also reviewed wetland features at the north end of the property, confirming observations from previous surveys. Standing water was generally limited even during peak flooding season, with many areas appearing to lack surface water, and areas of surface water appearing sporadic and shallow, with occasional deeper pockets (i.e. 20cm deep or greater) much smaller than 500m². These areas were observed to exhibit little standing water by June, and the typical character of the wetland complex at the north end of the property is that of wetland with a sub-surface (non-visible) water table covered in dense ground vegetation. As such, the wetland features at the north part of the property were assessed as generally unsuitable as SWH for amphibian breeding. In contrast, wetland areas of the property with substantial, longer-lasting standing water features (such as the SWTO2-6 and SWTO2-6 inclusion) were surveyed closely by Amphibian Point Count stations. All wetland areas which were assessed as having suitable, large, persistent standing water features were covered by Amphibian Point Count stations. As indicated in Azimuth's 2025 EIS, L3 call codes were not documented for two (2) or more of the listed frog species. As such, no wetlands within the study area were found to meet the criteria for Amphibian Breeding Habitat (Woodland).
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Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	<u>Comment #6</u> Given that approximately 6.0 ha of woodland containing potential suitable bat maternity roosting trees is proposed for removal, it is recommended that Azimuth consult with MECP to confirm that the proposed approach in the EIS is appropriate for this extent of potential SAR bat habitat removal. It is difficult to determine whether the test of no negative impact has been met when no information regarding the quality of bat habitat has been provided. The EIS does not include mapping of potential roosting habitat or quantification of suitable habitat remaining within or adjacent to the property, or in the greater region. In addition, the proponent has not indicated whether any compensation or habitat enhancement measures (e.g., native tree planting or installation of bat boxes) are proposed to offset the loss of potential roosting habitat.	A detailed bat snag mapping survey was not completed for the purposes of the EIS. As noted in Azimuth's response to Comment #1, a general bat snag screening was completed by Azimuth during leaf-off conditions. A general screening for potentially suitable snags with evidence of cracks, holes, splits, lifted bark, etc. was carried out in December 2023. Woodlands throughout the property, and within the greater study area, were evaluated to contain abundant potentially-suitable bat snags. Azimuth notes that potentially suitable snag features (to the degree that humans are capable of approximating them) are not unique or uncommon in forest and treed swamp vegetation communities, except for very young/early successional communities. Based on the direction provided in the MECP's Bat Survey Standards Note 2022 (MECP, 2022), it is understood that the MECP presumes presence of Endangered bats in all habitats containing potentially suitable roost trees. As such, Azimuth's EIS and impact assessment proceeded on the basis of "assuming presence", which aligns with the most recent direction Azimuth has received from the MECP. Woodland features within the proposed development footprint do not represent unique or rare forest types and do not have an unusual age structure; these are not expected to be unique within the contiguous Significant Woodland or the local area. As discussed in the updated EIS, woodland removals within the property represent very little (6.33%) of the overall contiguous woodland feature to which property woodlands are connected (approximately 88.09ha total contiguous patch size). Within the property boundaries, this represents a loss of less than 19% of property woodlands. The removal of less than 19% of property woodlands, and less than 7% of the overall significant woodland patch, is not expected to result in a reduction of the quality or availability of maternity roosting habitat within the local area. Azimuth is highly confident that retained woodland features within the property, within the study area, and within the overall Significant Woodland complex will continue to provide an abundance of high-quality bat habitat in a post-development scenario. As such, there is no expectation of negative impacts to SAR bats protected under the It is our understanding that the Species Conservation Act, 2025 (SCA; adopted April 2026) and its predecessor, the Endangered Species Act, 2007 (ESA) are proponent-driven, and that it is the responsibility of project proponents to ensure that the proposed activity is not occurring in contravention of the SCA and (formerly) ESA. The most recent guidance from the MECP regarding protected Threatened and Endangered SAR and the roles and responsibilities of the proponents is outlined in the Draft Client's Guide to Preliminary Screening for SAR (MECP, 2019), which advises that the proponent should consider whether a proposed activity is likely to contravene the ESA. Azimuth's most recent correspondence with the MECP has confirmed this stance, indicating that the agency no longer expects to issue Letters of Advice or issue "sign off" for every proposed development. The MECP has clarified: "If avoidance of Section 9 and 10 contraventions has been achieved then that is to the satisfaction of MECP, as we are only concerned with those projects which trigger the ESA. Said another way, the provisions of the ESA are habitat and species protection which are only triggered when there is an impact to SAR or their habitat". This is similar to DFO's "self-assessment" of projects, where if the project assesses out as not having impacts or can follow standard mitigation measures; there is no need to contact DFO and nothing is provided by them. It is Azimuth's professional opinion that, given our responses provided within this comment matrix, there is no reason to consult with MECP, as there is no expectation of in negative impacts to SAR bats. As such,
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Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	3.4 Significant Woodland <u>Comment #7</u> Section 7.3 of the EIS states: “Based on the above, the proposed redevelopment would retain approximately 82.09 ha of 88.09 ha (93.2%) of the overall contiguous woodland feature, and would be anticipated to preserve woodland form and function as it relates to Woodland Size and its associated significance. As such, there is no expectation that the proposed redevelopment would result in negative impacts to Significant Woodland. As such, this is anticipated to satisfy the Woodland size – 89 ha.” It is noted that the woodland boundaries shown in the Dufferin County Official Plan, the Township of Melancthon Official Plan, and the LIO Woodland layer differ slightly. Please clarify how Azimuth delineated the woodland feature and calculated the total size of the Significant Woodland used in the EIS analysis.	Azimuth has updated our EIS to include a detailed description of the methodology behind Significant Woodland delineation, as well as a visual mapping component in Appendix C to depict how this methodology was implemented. Woodland patch delineation, area measurements, and other standard parameters were refined based on provincial standards found in the Natural Heritage Reference Manual (NHRM; OMNR, 2010). In keeping with the Section 9.0 (oo) of the Melancthon OP, the Melancthon OP Significant Woodlands are intended to be mapped based on these same provincial standards. Azimuth notes that during detailed review of provincial standards as they apply to the subject property, the amount of woodland proposed for removal was refined and found to be smaller than originally quoted in Azimuth's 2025 EIS. When accounting for the existing developed openings within the property, as well as the revised development plan, the area of woodland removal was found to be 5.58ha, or approximately 6.33% of the Significant Woodland patch, smaller than the original estimate of approximately 6.0 ha (6.81% of the
Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	<u>Comment #8</u> Again, in Section 7.3, the EIS states, “The proposed redevelopment involves woodland removals within the western portion of the study area, totaling approximately 6.0ha. The removal of 6.0ha of woodland would represent a minor loss (6.81%) of the overall contiguous woodland feature to which property woodlands are connected, which measures approximately 88.09ha in size. No portions of the overall woodland feature would become fragmented/isolated as a result of the proposed redevelopment. Further, given that the proposed redevelopment avoids woodland fragmentation, the connectivity between various woodland elements within and adjacent to the property will be retained, and maintaining the overall linkages and corridors which permit species and ecological processes function within the greater woodland.”	The impact assessment section within Azimuth's EIS update now includes a discussion relating to interior habitat. An edge management provision has been added to Section 8.0 (Recommendations). Regarding the Dufferin OP, Section 2 of Azimuth's 2025 EIS and Azimuth's updated EIS both outline the County policy requirements as outlined by the OP. Section 5.3 within the Dufferin OP discusses development policies as they relate to Natural Heritage Features, under the Development and Site Alteration subsection. Section 5.3 (b) (i) of the Dufferin OP states that development and site alteration will not be permitted in significant woodland unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions. To this end, Azimuth's impact assessment has demonstrated that, provided the recommendations in EIS Section 8.0 are adhered to, there is no expectation of negative impacts to Significant Woodland. As such, Azimuth has adhered to Dufferin OP requirements with respect to Significant Woodland.

Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	Schedule E1 of the County OP identifies the significant woodlands on the subject property as part of the County Preliminary Natural Heritage System. Section 5.1 of the County OP outlines the objectives of the Natural Heritage System: a. Protect, restore or where possible enhance natural resources, including surface and groundwater resources to provide safe drinking water, promote water conservation, and recognize the importance of the County as an important headwater area. b. Protect, restore or where possible enhance natural heritage features and the environment, and recognize the importance of Provincially significant landscapes and land forms located within the Niagara Escarpment Plan, the Oak Ridges Moraine, and the Greenbelt Plan Area. c. Implement a Natural Heritage System to reinforce the protection, restoration or, where possible, enhancement of natural heritage features and functions and strengthen and promote their interconnectivity, for the overall environmental health of the County. d. Direct development and site alteration away from significant natural heritage features and areas. e. Protect water resources and sourcewater areas from contamination and degradation in order to improve the quality and quantity of water. f. Natural heritage features and areas will be protected for the long-term. The EIS indicates that approximately 6 ha of woodland will be removed from an 89 ha contiguous woodland feature and concludes that this will not result in negative impacts to Significant Woodland. Although 6 ha represents a relatively small proportion of the overall woodland, the proposed removal includes both edge and some interior woodland areas. The removal of woodland can result in increased edge effects (e.g., changes in microclimate, windthrow, invasive species establishment, and increased nest predation), which may reduce habitat quality and alter ecological function. Has Azimuth determined whether interior woodland habitat will be removed as part of the 6.0 ha proposed for redevelopment?	See above response to Comment #8
Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	Under the Provincial Policy Statement (2024, Section 4.1) and municipal Official Plan policies, development within or adjacent to Significant Woodland must demonstrate that there will be no negative impacts on the feature or its ecological functions. To substantiate this conclusion, the EIS should provide: • Assessment of impacts to interior habitat; • Discussion of anticipated edge effects and proposed mitigation measures (e.g., edge management, restoration or compensation planting); and • Discussion on how the proposed development meets the objectives of Section 5.1 of the County OP.	See above response to Comment #8
Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	<u>Comment #9</u> The terms “buffer” and “setback” appear to be used interchangeably throughout the EIS. For example, Section 7 recommends 15 m setback to the wetland, and a 20 m buffer to the watercourse.	Azimuth has updated our EIS to standardize the specific word being used, as both words were previously being used in the same context in our report, leading to confusion. Azimuth has changed any reference to "buffers" to "setbacks", which we think is most appropriate in this circumstance. From a technical perspective, a buffer is not defined by the Province as exclusively consisting of naturally vegetated land. Per Appendix D of the Natural Heritage Reference Manual (NHRM; OMNR, 2010), the province defines a "buffer" as follows: "<i>an area or band of permanent vegetation, preferably consisting of native species, located adjacent to a natural heritage feature and usually bordering lands that are subject to development or site alteration. The purpose of the buffer is to protect the feature and its functions by mitigating impacts of the proposed land use and allowing an area for edge phenomena to continue ... The buffer may also provide area for recreational trails and provides a physical separation from new development that will discourage encroachment .</i>"

		A buffer is a strip of naturally vegetated land that serves to separate development from environmentally sensitive areas and minimize associated human disturbance. A setback, on the other hand, is the minimum required distance between development (e.g., buildings, driveways, septic systems) and property lines. While a setback may include a natural buffer, it does not necessarily provide the same ecological function. For clarity we recommend using the term buffer when referring to the naturally vegetated areas to be maintained between natural features and proposed development on the property.	Any permanently vegetated ground providing a physical separation of a feature from new development would be anticipated to provide a degree of buffering capacity, albeit to differing degrees depending on the nature of the vegetation within the buffer. Azimuth notes that all of the areas discussed as buffers are overwhelmingly dominated by permanent vegetation and would be expected to exhibit a degree of buffering capacity. Additionally, from a technical perspective, the province also does not consider "setback" as a term to be exclusively used for distances relating to built infrastructure and property lines. Numerous annotated citations within the NHRM (OMNR, 2010) Section 16.0 discuss setbacks specifically in the context of protecting ecological features (such as watercourses and riparian zones). Setbacks within these annotated citations are frequently discussed as they relate to protection of natural heritage features, and may include buffers but may not be 100% occupied by a buffer (Carolinian Canada, 2000; Chagrin River Watershed Partners, Inc., 2006), Sinclair et al. 2005; etc.). Section 4.5 of the NHRM refers to setbacks somewhat interchangeably with buffers, stating "The areas to be set aside [to mitigate predicted impacts] are often referred to as 'setbacks' or 'buffers.'" Likewise, the Melancthon OP also refers to setbacks in a way consistent with this usage. As such, Azimuth is confident the contextual use of both terms in context within our EIS.
Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	<u>Comment #10</u> No natural heritage buffers are presented on any of the EIS figures. It is standard practice to include buffers to clearly illustrate the limits of development relative to natural heritage features. Please include appropriate natural heritage buffers on Figures 2 and 3 of the EIS. It is also noted that Azimuth did not recommend any woodland buffers for the remaining woodland areas on the property. Given that the proposed development will result in the removal of approximately 6.0 ha of woodland, appropriate buffers around retained woodland features is critical to protect their long-term ecological function and integrity. Without appropriate buffers, the remaining woodland may be subject to edge effects, increased disturbance, invasive species encroachment, and potential impacts from adjacent land uses. Please provide justification for the absence of recommended buffers, or propose appropriate buffer widths in accordance with municipal and provincial guidelines to ensure the protection of retained natural heritage features.	Azimuth has updated our EIS Figure 3 to include the setbacks quoted within our EIS reporting. This was omitted in error within our 2025 EIS. By convention it is Azimuth's preference to avoid putting setbacks on Figure 2 series diagrams since the setback itself is not an environmental feature/natural heritage feature. Regarding woodland buffers and setbacks, Azimuth has not provided any setbacks because woodland encroachment is proposed and there is limited room to propose setbacks elsewhere. Municipal and provincial guidelines with respect to Significant Woodland require that development must demonstrate no negative impact. While a setback or buffer may be the most straightforward means of demonstrating impact avoidance, Significant Woodland setback/buffer avoidance is not required by the PPS, Dufferin OP, or Melancthon OP. It is our understanding that the PPS, Dufferin OP and Melancthon OP require that development within Significant Woodland only be permitted if it is demonstrated there is no negative impact to the feature. These policies are summarized in Section 2 of Azimuth's EIS. None of these policies require a proposed development to adhere to a Significant Woodland setback; all include phrasing that indicates development is contemplated <u>within</u> Significant Woodland, provided that impacts to Significant Woodland are avoided. A buffer/setback is not demonstrated in this circumstance because there is no room between development and woodland, and further there is woodland encroachment. Given that Azimuth's EIS demonstrates that no negative impact is anticipated to Significant Woodland, the proposed development adheres to the municipal and provincial policy relating to Significant Woodland.

Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	<u>Comment #11</u> The EIS recommends that no vegetation clearing or disturbance occur during the peak bird breeding period (April 1 – August 31) and that “if any work requires that vegetation clearing is required between these dates screening by an ecologist is required with knowledge of bird species present in the area could be undertaken to ensure that the vegetation has been confirmed to be free of nests prior to clearing.” We note that Environment and Climate Change Canada¹ generally recommends against conducting active nest searches in most habitats during the breeding season. As referenced in the EIS, nest surveys are only appropriate for relatively simple habitats (e.g., urban parks with lawn and a few scattered trees, previously cleared areas, or human-built structures such as bridges). Given the approximately 6 ha of vegetation proposed for removal, active nest searching is not recommended for this scale of removal because the probability of detecting nests is very low, while the risk of damaging or disturbing nests, causing predation of eggs or young, or causing nest abandonment by adults is very high. Based on this information, it is unclear whether Azimuth intends to conduct nests searches to allow for clearing of the woodland during the breeding period, or whether clearing is to be avoided entirely during this time. Please clarify the intent of this recommendation.	The EIS has removed this provision per comment. The provision regarding bird nest screening within Azimuth's 2025 EIS mitigation measures was intended as a secondary option in the case of inadvertent extension of the tree-clearing process into the bird nesting season by the proponent. This could be undertaken, if at all, on a case-by-case basis, and Azimuth had no specific intention of completing such surveys except where deemed necessary/suitable, with the primary preference being for adherence to the original timing windows. Azimuth notes that there are numerous "simple habitat" treed areas on-property, and that many of these (particularly in isolation) could be appropriately targeted for bird nest surveys if tree clearing was not entirely completed by April 1 on a given year.
Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	<u>Comment #12</u> Section 7.5 of the report states, “In addition, should flow and fish passage be improved along the main channel of the Boyne River Tributary when the existing crossing is upgraded, this would provide the opportunity to improve both fish habitat quality (i.e., removing the thermal sink of the pond) and restoring fish passage to the upstream reaches.” It is recommended that a Fluvial Geomorphologist is retained to help with natural channel design for any works associated with the Boyne River Tributary.	Noted and agreed. Azimuth has updated Section 7.5 to state that a Fluvial Geomorphologist shall be retained to assist with natural channel design plans should these works be proposed within the Boyne River Tributary.

Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	<u>Comment #13</u> The ToR and Section 3.0 of the EIS both reference the development of a “restoration strategy”; however, no details are provided regarding this strategy, its objectives, or how it will be implemented as part of mitigation for the removal of approximately 6 ha of woodland. Given the extent of woodland loss, a restoration or compensation plan should be clearly described, including proposed locations, species composition, planting density, and long-term monitoring or maintenance measures. In addition, it is industry standard to develop an Edge Management Plan to mitigate edge effects and protect newly exposed forest edges from windthrow and invasive species encroachment. The EIS should include a commitment to preparing such a plan and describe how it will be implemented to maintain woodland function post-construction.	Azimuth has added an Edge Management section to our updated Recommendations (Section 8.0). The TOR of the Township's 2024 Peer Reviewer (R.J. Burnside & Associates Ltd.) only recommends the EIS "identify opportunities for clean-up, restoration and enhancement" and does not require the EIS itself to create a detailed compensation and restoration plan for submission. Azimuth's EIS Section 3.0 generally indicates that Azimuth "Developed an appropriate avoidance/mitigation/restoration strategy relative to the proposed redevelopment.." as part of the EIS, which includes "restoration strategy" as one of several optional items associated with impact mitigation, and at most suggests a high-level strategy rather than a detailed compensation and restoration plan. To this end, Azimuth's 2025 EIS outlined opportunities for restoration and enhancement within Recommendations Section 8.5 in association with Fish and Fish Habitat, in which numerous mitigation measures are discussed, including "Riparian plantings along the pond and outlet channel to shade water and reduce surface water temperatures". Limited additional opportunities for restoration and compensation plantings were identified due to the limitations of the site plan; however, additional opportunities have been summarized within an updated section within Section 8.0. Azimuth notes that given the extremely general and high-level nature of the TOR comment, as reflected in the high-level wording in Azimuth's EIS Section 3.0, it is unreasonable to require the EIS to create a detailed restoration/compensation plan as part of this submission, as this level of detail was not required within the TOR. Future planning applications (MOPA, ZBLA and Site Plan Approval) will allow for the opportunity to develop a
Hutchinson Environmental Sciences Ltd. EIS Peer Review	Sarah Aitken, Senior Ecologist	4. Conclusions In our peer review we identified concerns or questions relating to the following: • Field investigations, • Wetlands, • Significant Wildlife Habitat, • Significant Woodlands, and • Mitigation Measures. Based on the extent and location of the proposed woodland removal, there are concerns that the proposed development may negatively affect the ecological function of the Significant Woodland, additional analysis and mitigation are required to address these potential impacts.	It is understood that this is a summary of the items discussed within Hutchinson Environmental Sciences, Ltd.'s Peer Review (Comments #1-13). Azimuth has addressed these items through our above comment responses.
Mississaugas of the Credit First Nation - Department of Consultation and Accommodation	Payton Mitchell	MCFN’s Department of Consultation and Accommodation (DOCA) have no questions or comments for you at this time. This does not indicate a position of support for the project, that the Duty to Consult and Accommodate the MCFN has been met, or that there are no adverse impacts to the MCFN’s Indigenous and Treaty Rights. DOCA expects to be notified of any and all future project updates and/or changes. Additionally, DOCA must be notified of, invited to participate in, and provided the opportunity to review any environmental and/or archaeological assessments. At its discretion, DOCA may request capacity funding from the proponent for its consultation and engagement activities relating to the project.	Acknowledged and confirming that a revised Archaeology Assessment and revised Environmental Impact Study are included in resubmission, with intent to circulate to MCFN.

Shelburne and District Fire Department	Dave Pratt, Fire Chief Phone: (519) 925-5111 Mobile: 519-938-1609 dpratt@sdfd.ca	The Shelburne and District Fire Department have no objections to the proposed development. Our comments, as they would be for any development of this type, relate to access and water supply. Will there be on-site water available for firefighting?	Acknowledged. On-site water supply will be available for fire-fighting. Refer to FSR previously submitted.
Shelburne and District Fire Department	Dave Pratt, Fire Chief Phone: (519) 925-5111 Mobile: 519-938-1609 dpratt@sdfd.ca	Will there be on-street parking, and if so are the road allowances enough to allow a fire truck to access	The internal road network is designed to accommodate fire truck access. No on street parking is planned, visitor parking is in dedicated areas and units can accommodate 2 parking spaces, while one (1) is currently shown.
Shelburne and District Fire Department	Dave Pratt, Fire Chief Phone: (519) 925-5111 Mobile: 519-938-1609 dpratt@sdfd.ca	Is there a snow storage / removal plan so the accumulation of snow does not impact access for emergency services	Comment is acknowledged and access for emergency services will be maintained on site. Initial snow storage locations are being conceptually reviewed at the current planning stage and will be detailed in future subsequent planning stages.
Shelburne and District Fire Department	Dave Pratt, Fire Chief Phone: (519) 925-5111 Mobile: 519-938-1609 dpratt@sdfd.ca	Will there be a secondary access for emergency services should the primary access be obstructed	Secondary access options were reviewed but determined to be unfeasible due to existing site condition and environmental and engineering constraints. An enhanced access is proposed at the existing Sixth Line entrance - as detailed in the revised TIS included in resubmission.
Shelburne and District Fire Department	Dave Pratt, Fire Chief Phone: (519) 925-5111 Mobile: 519-938-1609 dpratt@sdfd.ca	With the distance of the side yard setbacks does the County or Township require a fire break every 6th house during construction until the exterior siding has been installed so if there was a fire it would limit the number of houses potentially affected	Acknowledged. This has not been raised by the County or Township.
Six Nations of the Grand River - Elected Council Lands and Resources Department	Emmett Vanson lrlust@sixnations.ca	1701 Nanfan Treaty Preamble Six Nations of the Grand River (SNGR) Territory is within the most highly urbanized land in Canada. Development has occurred on Six Nations' traditional territory without consultation or consent of SNGR. The cumulative effects of this intense development have contributed to significant environmental degradation, and, as a result, Six Nations has experienced severe impacts on its ability to exercise Aboriginal and Treaty Rights that are not only set out in the treaties themselves but are also recognized and affirmed in Section 35 of the Constitution Act, 1982. The 1701 Nanfan Treaty guarantees SNGR's right to harvest and hunt on this property for perpetuity, but this proposal undermines those rights. SNGR must be accommodated to mitigate any harm to its treaty rights caused by the proponent.	Comment received and acknowledged. Initial meeting with SNGREC held on June 1 to discuss comments and initial responses are provided below.

Six Nations of the Grand River	Emmett Vanson lrlust@ sixnations.ca	SNGREC's Stance SNGREC opposes the proposed development on the site known as 476420 3 Line, Melancthon. While the current camping and RV use has some negative effects on the surrounding woodland and wetland, these effects would pale in comparison to that of formal development. The proposed 15m buffers are insufficient to protect the wetlands. Utilizing a sufficient buffer of 41m or more would restrict this development to the point of not being worthwhile. Further, indirect and cumulative impacts are not considered within the EIS or the design. These issues combined with other constraints noted by NVCA and the Township mean this project is not feasible. Further, this would push the current users to other locations, straining their capacities and potentially resulting in the creation of another, similar site with new environmental concerns. This is not a suitable site for development. The following comments go into more depth on SNGREC's opposition, and more requirements (i.e. design and compensation requirements) will be communicated at a later date should this application proceed.	Comment acknowledged and understood as a summary of specific comments. Comments addressed individually below. Confirming that a revised and updated EIS has been prepared for this resubmission and for Six Nations review.
Six Nations of the Grand River	Emmett Vanson lrlust@ sixnations.ca	Buffers SNGREC requires a wetland buffer of 41m, rather than the 15m proposed by the EIS and the proponent with no defense as to scientific reasoning for this to be sufficient. SNGREC's 41m buffer is informed by indigenous knowledge, experience, and perspectives as well as modern science. Beacon Environmental's 2012 Ecological Buffer Guideline Review looks at various buffers used in the past and on table 7 on page 88 suggests that a buffer of 41m results in a low risk of water quality issues and habitat failure. Any less is a moderate risk, which is unacceptable to SNGREC. This buffer considers indirect and cumulative effects, as litter, chemical (i.e. salt), noise, and light pollution will all be harmful impacts to the surrounding woodland and wetlands, alongside other impacts. While the trailer park/camping area is within the 41m buffer zone, this will have far lesser impacts than hard development and paving, and education could help them improve and reduce their existing impacts through methods such as riparian planting. A buffer of 15m is uniformly insufficient for wetlands regardless of designations such as locally or provincially significant. Existing degradation due to human effects is not a reason to discount a wetland but rather can be a source for environmental enhancement.	Comment acknowledged. It is not our team's place to comment on SNGREC's indigenous knowledge, experience and perspectives, however we can speak to general buffer considerations. In all cases, residential lots have a minimum 15m wetland buffer and in several areas this minimum is exceeded (including a furthest separation of 58 metres in the north). On review, the average buffer exceeds 15 metres and only 46 residential units (20% of total) abut the wetland buffer directly. The remaining units exceed 15m separation from the wetland limit. All units will support soft landscaping in rear yards. Where other areas of the proposed redevelopment abut the buffer, including landscape/open space and SWM ponds, no hard development is proposed and their potential impact can be mitigated through restoration plantings - as recommended by SNGREC. Regarding the Beacon report, on review Azimuth notes that context is recommended when considering buffer widths, and that buffers do not necessarily need to be uniform to provide function for the feature. This is stated in the Beacon report: "application of only the widest recommended buffers (i.e. "low risk") without consideration for the site-specific conditions, or sensitivity of receiving attributes, might equally result in the identification of a buffer that is unnecessarily wide" (Beacon, 2012). Further: "It is also important to keep in mind that buffers need not be uniform and that there may be elements specific to a site that warrant a wider buffer in one location than another". A 15m setback and buffer provides an effective function and adheres to Beacon's statement. Further, the Azimuth field surveys indicate that much of the wetland has been historically disturbed. As such, a setback of 15 metres is considered sufficient to support the existing wetland function. The proposed redevelopment will provide this setback, but considering the existing disturbed state will also enhance and improve the wetland feature through delineation and restoration. The proposed site configuration, including average buffer greater than 15m, will help to improve the existing conditions and enhance the wetland for future residents and users of the land.
Six Nations of the Grand River	Emmett Vanson lrlust@ sixnations.ca	Tree Compensation SNGREC requires 10:1 tree replacement for all trees removed, regardless of DBH, and 1:1 replacement for any snags or dead trees removed. Due to the amount of woodland being removed, this may be unfeasible for the proponent, further making the application unfeasible. All compensation plantings must be completed before development and tree removal begins.	Comment acknowledged. At this time, specific numbers of tree removals have not been determined, and will not be known until future planning stages through the completion of an Arborist report. Pending further review at that future stage, we recommend a tree compensation ratio consistent with other tree compensation projects within this region.

Six Nations of the Grand River	Emmett Vanson lrlust@ sixnations.ca	<i>Additional Comment Received June 1 2026:</i> SNGREC requires a 10:1 tree replacement ratio for all trees removed regardless of DBH and 1:1 for any dead trees/snags removed as these are an important habitat feature. SNGREC seeks commitment to this tree replacement ratio. A high tree replacement ratio helps to restore lost ecological function and considers time for 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. Further, the higher tree replacement ratio better compensates for the long lasting, permanent impact of the development on the land which 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. 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. The 10:1 ratio can be achieved by planting plugs or other earlier-growth trees, and they do not all need to be full street-tree size. Planting earlier-growth trees will require protection (i.e. herbivore browsing guards) and minor maintenance. Planting a variety of tree sizes can promote a healthier ecosystem. 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.	As above, tree removals are to be reviewed in detail through future planning stages. Comment and alternative planting arrangements are acknowledged and we can commit to future engagement on this item.
	SNGREC encourages collaboration with the Region of Dufferin, Town of Melancthon, Nottawasaga Valley Conservation Authority, Grand River Conservation Authority, or other local landholders with conservation lands to achieve these offset plantings. Lastly, the Six Nations of the Grand River Environmental Levy may be considered should closer sites be unavailable, allowing SNGREC to purchase land and plant trees on behalf of the proponent. SNGREC’s Environmental Levy is a cash-in-lieu option that is more financially feasible than other cash-in-lieu options as SNGREC will plant trees that are not full caliber, resulting in a cost of about \$35 per tree planted. SNGREC expects that the tree replacement is paired with a robust and complete monitoring and maintenance plan complete with contingency actions to ensure successful establishment of the trees for long term success.		

Six Nations of the Grand River	Emmett Vanson Irlust@ sixnations.ca	Required Studies SNGREC requires studies to be multi-year and multi-season. Year-to-year variation means that studying for one year cannot determine the absence of a species. SNGREC requires that wetland delineation is determined at peak wet seasons to find the maximal state of a wetland, with recorded proof relating to water levels and recent rainfall.	Comment acknowledged. Azimuth studies were designed based on typical industry standards and as confirmed through Terms of Reference review with the Township/Peer Reviewer (RJ Burnside). Acknowledging the comment, multiple-year studies are rare and typically occur only if standard study elements are missing and require further study. It is Azimuth's opinion that the implemented EIS study period was reasonable and consistent with similar EIS work in the area, and that natural heritage features and functions have been accurately captured on the property. Given the degree of existing disturbance on this property, Azimuth does not expect a multi-year study to document additional provincially significant species or significant wildlife habitat. Regarding wetland delineation, Azimuth completed an updated wetland delineation in conjunction with NVCA staff and wetland delineation was completed with due diligence to the Provincial OWES standard and to the best of Azimuth's professional capabilities. Agreed that seasonal surface water conditions on this site may change over the course of the year, it is our understanding that OWES does not consider the maximum coverage of surface water on a given year to be indicative of the formal extent of a wetland. OWES relies heavily on vegetation indicators, sometimes supplemented by soil analysis, to distinguish short-term upland flooding from sustained wetland conditions. It is our understanding that this can be an important distinction separating floodplain/lowland forests or seasonal pooling areas (dominated by upland plants) from wetland
Six Nations of the Grand River	Emmett Vanson Irlust@ sixnations.ca	Land Use SNGREC believes building a residential area in this location is irresponsible considering the sensitivity of the location versus the lack of services, employment, and commercial resources. While Shelburne is not a long drive away, this explicit car dependency is not the right way forwards, and alternate locations should be considered.	Proposed redevelopment concept is revised in the resubmission to identify a greater housing mix and range of uses on site. A townhouse built form was introduced and a commercial area is proposed central to the site, which provides for a greater accessibility of goods and services.
Six Nations of the Grand River	Emmett Vanson Irlust@ sixnations.ca	Stormwater Management (SWM) SNGREC requires that SWM blocks are buffered the same as development. They cannot be considered habitat and should be considered infrastructure. SWM features can be an additional benefit when used beyond a sufficient buffer of 41m or more. Further, SNGREC requires that SWM systems do not affect the thermal regime of output streams and that a monitoring and contingency plan is set up for 5 years beyond 80% occupancy. Further, SNGREC requires that SWM ponds are located such that they do not risk overflow and release of contaminants into the surrounding area.	To confirm, SWM blocks are treated as development within the EIS as it pertains to the proposed NHS setbacks to ensure ponds do not negatively impact the form or function of these NHS features. Regarding impact, they are considered to have greater potential for mitigation than other land uses within the proposed redevelopment and appropriate with sufficient mitigation measures proposed. Riparian plantings along the pond and outlet channel are recommended as mitigation, in part to shade water and reduce surface water temperatures/thermal impacts. SWM ponds are commonly approved in proximity to natural features and are generally considered 'low impact' once vegetation and riparian plantings are established. Details on the specific location and design of the SWM outlets are not yet known at this planning stage but will be assessed during detailed design, including through a Fisheries Screening. At that stage, measures can be reviewed to mitigate potential impact to surrounding NHS features, including flow dissipation devices, scour prevention/channel armouring, and water quality controls. With respect to water discharge into the Boyne River Tributary, it is estimated that with the size of the ponds, discharge would be infrequent and only occur during rainfall events that exceed 10mm+. A 20m setback to the Boyne River Tributary is a commonly accepted buffer width based on provincial standards in the Natural Heritage Reference Manual (NHRM; OMNR, 2010). The 2012 Beacon report outlines that a majority of the 'low risk' characterizations begin at 30+m, and the 'moderate risk' buffer width ranges from 10-30m. A 'moderate risk' designation indicates that further assessment of impact and mitigation should be undertaken - not that impacts have a moderate chance to occur.
Six Nations of the Grand River	Emmett Vanson Irlust@ sixnations.ca	Black Ash SNGREC requires avoidance of 30m black ash buffers as a permit to work within the buffer defeats the purpose of protection. Regardless of any future changes to regulations thanks to Bill 5, the most stringent regulations should be followed.	Comment acknowledged and we note that additional work is required to clarify precisely where protected Black Ash are located. Further Arborist report and a Black Ash Assessment are recommended in future planning stages to determine next steps. The 30m permitting buffer as discussed in the EIS allows for continued review of Black ash throughout the development process.

Six Nations of the Grand River	Emmett Vanson lrlust@ sixnations.ca	<i>Additional Comment Received June 1 2026:</i> Treaty Rights Accommodation and Compensation Further development of the land infringes on Six Nations Aboriginal and Treaty Rights by essentially guaranteeing land will not be returned to a natural state and by negatively impacting the environment through missions and use of resources. Developments on this land fall under the Duty to Consult and Accommodate, meaning Six Nations of the Grand River must be consulted with and accommodated for impacts to their rights.	Comment acknowledged and ongoing duty to consult is recognized. Consultation is ongoing and we thank the Six Nations for their continued involvement in the project.
Six Nations of the Grand River	Emmett Vanson lrlust@ sixnations.ca	<i>Additional Comment Received June 1 2026:</i> Landscaping SNGREC requires that native plant species are prioritized in landscaping efforts, and that invasive or potentially invasive species are completely avoided. Non-native species are less ecologically beneficial, and some non-native species can become invasive even after decades of seeming fine. For example, Norway Maples were previously mass planted as they were believed to be a positive plant but are now considered highly invasive. Further, cultivars of non-native species that are considered “sterile” are not safe to plant, as they can still cross-pollinate with fertile plants and sometimes produce more potent young (Gould 2023, Knight et al. 2011). SNGREC requires an opportunity to review all landscape plant lists before procurement begins. SNGREC requests that the proponent uses Kayanase Plant Nursery for procurement of plants if Kayanase’s capacity allows. SNGREC requests that the proponent commits to these actions during this phase of the application. SNGREC strongly encourages the creation of pollinator gardens using native plant species in landscaped areas not intended for human movement. Pollinator gardens can offer food, breeding space, and sanctuary for pollinators that are harmed by human expansion as they lose functional habitat, and their remaining habitat becomes more fragmented. Pollinator gardens will also increase the visual attractiveness of the area. Community gardens could also be implemented alongside pollinator gardens for an added community benefit.	Comment acknowledged and can be reviewed in further detail in future planning stages. At the current stage, no landscape plans have been requested/prepared. SNGREC planting guidance per comment can be prioritized for review.
Six Nations of the Grand River	Emmett Vanson lrlust@ sixnations.ca	<i>Additional Comment Received June 1 2026:</i> Bird and Light Friendly Design SNGREC requests that the buildings and streetscapes are designed using bird and light friendly practices. This includes minimizing reflective surfaces, creating visual markers on windows, smaller windows or windows divided by mullions, windows angled slightly downwards, and using warmer lights that are directed downwards and away from natural areas. Federal laws such as Migratory Birds Regulations (2022) and the Species at Risk Act (2002) prohibit the harm or killing of birds, even as “incidental take”. Please see the City of Toronto’s bird friendly practices for glass and for lighting as guidelines and implement them thoroughly across the entire design. SNGREC requests commitment at this stage of development to explore and implement thorough bird and light friendly practices during the appropriate phases. It is not just high-rise buildings that result in birds dying due to window collisions, as an estimated 90% of the millions of bird-window collision deaths occur on home windows (Machtans et al., 2013). While this statistic relates to the prevalence of low-density homes, it shows that they also contribute greatly to the problem and should still be considered for window treatments.	As above, comment acknowledged and bird/light friendly design can be reviewed in further detail in future planning stages. At the current stage, no detailed architectural plans have been prepared.

Planning Division Township of Melancthon	Liam Morgan phone: 519-941-2816 ext. 2511 lmorgan@ melancthontownship.ca	The legal non-conforming argument presented in this Planning Justification Report ('PJR') is questionable from the perspective of planning staff. It is our belief that legal nonconforming means that the existing use was legal under previous planning policies, such as Official Plans and Zoning By-laws, but is now no longer legal under the current planning policy framework. Subsection c) of Section 7.6 in the Official Plan further supports that belief by stating that "legally existing land uses at the date and time of adoption of this Plan that are not in conformity with the Plan's policies are considered as legal nonconformity uses, and, in the long term, should cease to exist". While campgrounds and residential development in the form of new detached dwellings on existing vacant lots and new residential lots created through the severance process are permitted uses under both the Rural and Environmental Conservation designations, the current existing use that includes sixteen (16) permanent residences has never been permitted under both designations. This is also true for the Zoning By-law whereby sixteen (16) permanent residential dwellings has never been a permitted use under the OS1, Open Space Conservation (OS2), and General Agricultural (A1) zones. In our opinion, any discussion pertaining to legal non-conforming uses should be removed from the PJR given that the existing use does not align with the legal non-conforming argument.	Comment acknowledged and legal non-conforming argument has been removed from Planning Justification Report, as discussed with planning staff.
Planning Division Township of Melancthon	Liam Morgan phone: 519-941-2816 ext. 2511 lmorgan@ melancthontownship.ca	The Township Official Plan, as per section 3.1.1 (e), identifies three principal methods for accommodating residential growth, which are outlined below. The proposed development is not associated with either of the three permitted methods for residential growth and, as such, planning staff question the proposed developments general conformity with critical growth policies of the Official Plan. i. Residential development on most of those approximately 185 existing residential sized vacant lots in the Township that are appropriately designated and zoned, that appear to have sufficient area for on-site services and where the construction of a dwelling would be in conformity with the applicable policies of this Plan. ii. Lot creation and appropriate intensification, including infilling, within the communities of Horning's Mills, Corbetton and Riverview. iii. Limited rural residential development on new lots created by consents in areas within the Rural designation.	As discussed with staff, the PPS does permit establishment of new community areas, and the COP was recently modified by the MMAH through OPA #4 approval to remove the prohibition on creation of new community areas. Per working meetings with Planning Staff in Jan-Mar 2026, the Township OP is required to be consistent with PPS and suggest this comment references now outdated policy. Establishment of a settlement area is considered an appropriate method to accommodate growth.
Planning Division Township of Melancthon	Liam Morgan phone: 519-941-2816 ext. 2511 lmorgan@ melancthontownship.ca	Further to the above, subsection h) of section 3.1.1 explicitly states that "the creation of new communities or settlement areas is not permitted in the Township". Being that the proposed development seeks to establish a new community settlement area, planning staff question whether support for this application can be provided given that it directly contradicts key growth policies of the Official Plan.	As above, and as discussed with staff, the policy context is evolving and new community areas are no longer prohibited.

Planning Division Township of Melancthon	Liam Morgan phone: 519-941-2816 ext. 2511 lmorgan@ melancthontownship.ca	While we can appreciate the applicants inclusion of the Community policies, those solely pertain to the three existing settlement areas. More appropriate policies to determine conformity with are section 3.1.3 (Growth Accommodation Outside of Communities). Subsection a) of section 3.1.3 states that “some additional growth accommodation shall continue to be provided over the planning period through the construction of dwellings on most existing vacant rural residential lots and limited rural residential lot creation...”. The proposed development does not suggest the utilization of either one of those development methods and, as such, would not conform to that section of the Official Plan. What planning staff will note is should these lands be identified as a new settlement area, the policies of the Community designation would apply to which we believe the proposed development would be able to comply with.	As above, and as discussed with staff, the policy context is evolving and we suggest creation of a new community area and application of 3.1.3 is appropriate in this instance.
Planning Division Township of Melancthon	Liam Morgan phone: 519-941-2816 ext. 2511 lmorgan@ melancthontownship.ca	The PJR does not make reference, nor make any analysis, on the policies of section 3.5.3 (Contaminated Sites). Being that the proponent identifies the subject lands as brownfield, the Township will request that discussion on these policies are undertaken in the Township Official Plan section of the report.	PJR updated per discussion with Planning Staff through working meetings in Jan-Mar 2026.
Planning Division Township of Melancthon	Liam Morgan phone: 519-941-2816 ext. 2511 lmorgan@ melancthontownship.ca	A review of the submitted Functional Servicing Report and Hydrogeological Report will be undertaken by the Township engineering consultant upon proceeding to the Township planning application(s) stage.	Acknowledged.
Planning Division Township of Melancthon	Liam Morgan phone: 519-941-2816 ext. 2511 lmorgan@ melancthontownship.ca	The zoning by-law seeks to establish a new zone (Leasehold Community Home) and associated regulations. What was the basis used for the regulations that were established? Were any precedent examples from other municipalities used? It would be the Township’s preference for the applicant to utilize existing zones, such as the Hamlet Residential (R1) or Small Lot Estate Residential (ER1), and adjust regulations based on the preferred zoning choice.	LCH zone drafted by GSAI and intended to recognize unique context of subject property and proposed redevelopment, including greater provision of affordable housing. Regulations intended to be similar to existing Township zones and suggest discussion with staff for refinement. Could potentially be implemented through Township ZBLA update exercise.
Planning Division Township of Melancthon	Liam Morgan phone: 519-941-2816 ext. 2511 lmorgan@ melancthontownship.ca	It is our understanding that the County of Dufferin has retained a peer reviewer to review the submitted Environmental Impact Study (EIS). Township planning staff will defer comments on the policies pertaining to the natural environment until such time that planning staff can review the peer review comments.	Acknowledged.

Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	General Comments: Thank you for providing Wellington-Dufferin-Guelph (WDG) Public Health with the opportunity to comment on the Chipwoods Park Community application. From a public health and safety perspective, a community is optimally designed when it considers a complete communities approach. Complete communities provide residents with convenient access to a diverse mix of housing options, green space, and recreation opportunities within a compact and connected form. Such communities reduce reliance on personal vehicles, encourage active transportation, and foster social cohesion by bringing people closer to where they live, work, learn, and play. A complete community designs for safe, inclusive, and age-friendly neighbourhoods that support health equity, climate resilience, and long-term sustainability. Glen Schnarr & Associates Inc. (“GSAI”) is commended for considering numerous components in their application that compliment healthy community planning, such as affordable housing, active transportation elements, greenspaces and accessibility. The following recommendations are intended to further strengthen the application. Please note that WDG Public Health defers to the expertise of the Nottawasaga Valley Conservation Authority (NVCA) on technical matters related to flooding, erosion hazards, stormwater management and other natural hazards.	Comment acknowledged and the proposed redevelopment concept has been revised with further effort to create complete community - including new housing form (townhouse) and new mix of uses (commercial) on site.
Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	Recommendations Active Transportation Pathways and Connections We are pleased that “informal walking linkages” are planned for the development, as stated in the Planning Justification Report. However, no details are provided on their exact locations, design or maintenance. Safe and accessible pathways support increased active travel behaviours within communities. By designing convenient, well-connected pathway linkages, residents and visitors will be encouraged to walk or bike throughout the community to visit neighbours and to access greenspaces and amenities. This is particularly important within communities with limited vehicle parking, such as Chipwoods Park. We recommend that active transportation pathways are designed to support walking and cycling for people of all ages and abilities, are maintained year-round and provide connections to all residential areas, greenspaces and amenities within the community. Where possible throughout the pathway network, we recommend the use of lighting to promote safety, trees to support shade and aesthetics, and accessible seating to encourage passive recreation.	All internal roadways are planned with sidewalks on both sides of the road and provide a planned system of active transportation connection through the community. Details on maintenance, lighting, and landscaping will be confirmed in future planning stages.
Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	To encourage the strategic placement of the pathway network, we propose connections to the following locations where feasible: • A pathway connecting the two cul-de-sacs in the north-east area of the community with one another • A pathway connecting the cul-de-sac in the west end of the community to the residential area located adjacent to the common recreation area • Develop a pathway or trail from the southernmost cul-de-sac in the west end of the community to route behind residential lots and connect to the nearby parkette and finish at the common recreation area • Develop a pathway or trail in the “landscape open space” area that would loop around the wetland constraint zone in the center of the community	Comment acknowledged and can be reviewed in greater detail through future planning stages (Ex. Township OPA/ZBLA/Site Plan). An internal sidewalk network provides interconnectivity within the entirety of the redevelopment.

Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	Bicycle Parking Please consider providing sheltered short-term bicycle parking at amenity areas to provide residents and visitors with safe bicycle storage options. Suggested locations include the common recreation area, the check-in area and all parkettes. To encourage active travel as a regular means of transportation, supportive elements such as bicycle parking need to be included in the design of the development. Please also consider bicycle parking that accommodates bicycles for all ages and abilities where possible. For example, consider bicycle rack sizes that can accommodate cargo bikes, bicycles with chariots or trailers, and adaptive bikes.	Seven conceptual bicycle parking locations have been identified throughout the concept in parkettes and open space areas, encouraging active travel through the site. To be reviewed in greater detail through future planning stages.
Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	Lighting Where feasible, include lighting along all roadways and active travel pathways, at amenity areas/greenspaces and at the community entrance. Providing lighting enhances resident sense of safety within their community which encourages greater use of amenity spaces and travel by walking and cycling in the evenings. Lighting also enhances visibility among road users supporting safer travel among motorists, cyclists and pedestrians.	Comment acknowledged and can be reviewed in greater detail through future planning stages (Ex. Township OPA/ZBLA/Site Plan).
Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	Amenity Recreation Areas and Parkettes WDG Public Health supports the inclusion of outdoor amenity spaces such as parkettes, the recreation centre and its surrounding recreation area. Consider the design of these amenity spaces to incorporate elements for both passive and active recreation. Providing elements for active recreation can enhance physical activity among residents. Additionally, elements for passive recreation can provide more outdoor opportunities that can accommodate all ages and abilities and enhance social connections, particularly for older adults and those with varying mobility. Please consider including the following: • Include opportunities for passive recreation such accessible seating and picnic tables. • Include opportunities for active recreation such as an accessible play structure. • Where possible provide opportunities for shade (e.g., trees, shade structures) to provide relief during extreme heat events. • Where appropriate include lighting to provide a feeling of safety. • Include a continuous pathway(s) to amenity spaces and parkettes, that is connected to existing walkways and trails.	Three total parkettes and common recreation area now proposed in the revised concept. Details and programming to be reviewed in greater detail through future planning stages.
Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	Urban Agriculture Consider providing opportunities for small-scale urban agriculture within the development. Designing communities where residents have access to affordable, nutritious and culturally relevant foods can help reduce health inequities and improve overall health and wellbeing. Urban agriculture initiatives can provide residents with opportunities to grow their own foods, spend time with nature and enhance social connectedness within the community. We recommend integrating edible landscaping, fruit trees and a community garden where feasible and appropriate within the designated greenspace areas. To support the success of these initiatives, we also recommend providing supportive infrastructure such as water sources.	Comment acknowledged and can be reviewed in greater detail through future planning stages (Ex. Township OPA/ZBLA/Site Plan).

Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	Heat and Air Quality Consider incorporating quantifiable shade targets for outdoor spaces (parks, play areas, main pedestrian routes) based on shade coverage at tree maturity or through a combination of tree canopy and shade structures. Shade is one of the most effective interventions to reduce the risk of heat-related illness, to protect children and older adults, and to make walking routes more comfortable. Predictable shade coverage is important to ensure outdoor spaces remain safe and usable throughout even the hottest of summer days. We recommend making drinking water refill stations available in outdoor amenity areas and at the community hall to support hydration during hot weather. Heat stress and dehydration can occur quickly, particularly for children, seniors and individuals with chronic health conditions. Quick public access to refill stations can improve hydration, reduce reliance on bottled water and support the healthy and active use of outdoor spaces.	Comment acknowledged and can be reviewed in greater detail through future planning stages (Ex. Township OPA/ZBLA/Site Plan).
Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	Refuge and Emergency Preparedness Consider designating the community hall to function as a cooling and clean-air space during extreme heat and wildfire events. By creating a centralized, accessible and familiar location, the redevelopment can support residents seeking relief during climate-related emergencies. Common meeting spaces during emergencies can also serve as important hubs for communication. For example, in the event of extended power outages, flooding, heat waves or wildfire smoke, residents could receive timely updates, access critical support or services and connect with neighbours. It also supports long-term resilience by strengthening community social connections and reducing the risk of individuals being left unsupported during times of crisis. A refuge area should include: • Back-up power with capacity for at least 72 hours, consistent with federal and some municipal preparedness standards • Mechanical cooling (e.g., air conditioning) to ensure safe indoor temperatures during heat waves • Air filtration (at least MERV-13) or portable HEPA units to maintain healthy indoor air quality during wildfire smoke events	Comment acknowledged and can be reviewed in greater detail through future planning stages (Ex. Township OPA/ZBLA/Site Plan).
Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	A community refuge area should be designed to meet the diverse needs of residents. Consider detailing requirements to make the space accessible and equitable for individuals of all ages, abilities, and needs: • Quiet areas for individuals with sensory sensitivities • Families with young children may require private areas for breastfeeding and access to refrigeration • Sufficient clearance and designated space for individuals using mobility aids These features acknowledge that individuals who rely most heavily on refuge spaces may also experience social isolation, economic vulnerability or limited mobility. Ensuring inclusivity helps protect those at highest risk.	Comment acknowledged and can be reviewed in greater detail through future planning stages (Ex. Township OPA/ZBLA/Site Plan).

Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	Stormwater and Vector Management Given the proximity of the redevelopment to wetlands and waterways, please consider designing stormwater facilities in ways that minimize potential vector-borne disease risks. Stormwater facilities can create standing water habitats that support mosquito breeding. We suggest incorporating features such as aeration or circulation measures to reduce stagnant water, thereby reducing mosquito habitat and to reduce the risk of West Nile virus and other mosquito-borne diseases.	Comment acknowledged and can be reviewed in greater detail through future planning stages (Ex. Township OPA/ZBLA/Site Plan).
Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	Please consider confirming that stormwater design assumptions incorporate climate change rainfall projections for the region. Extreme rainfall events are expected to increase in both frequency and duration, which may challenge traditional stormwater capacity assumptions. Incorporating updated climate-adjusted factors will help to ensure that stormwater facilities can effectively manage runoff, protecting water quality and human health.	Comment acknowledged and can be reviewed in greater detail through future planning stages (Ex. Township OPA/ZBLA/Site Plan).
Wellington-Dufferin-Guelph Public Health	Alexandra Fournier Tyler Black Adrianna DeCorso	Flooding Hazards From a health perspective, we suggest clear and accessible resident communications on flood risks, safe sheltering during periods of extreme rainfall and heightened flood risk, and emergency protocols. Clear communication can help residents to make safe choices during emergencies. Consider including the following information for all residents: • Maps and signage identifying areas of higher flood risk within the community • Information on safe sheltering options during periods of extreme rainfall or heightened flood risk • Household-level emergency preparedness guidance Please also consider the role of trees and naturalized landscapes in flood mitigation. Large canopy trees and well-placed vegetation can slow runoff, increasing water infiltration to soils. Preserving existing mature trees and planting new climate-adapted and native species can reduce localized flooding while providing co-benefits (shade, cooling, improved air quality).	Comment acknowledged and can be reviewed in greater detail through future planning stages (Ex. Township OPA/ZBLA/Site Plan).
Dufferin Federation of Agriculture	Bill McCutcheon, President	DFA would like to convey our concerns with the proposed Chipwoods Park Redevelopment. These are prime agricultural lands. There is a significant difference between a trailer park use on prime agricultural lands compared to that of an established residential subdivision, which would never allow the lands to be returned to an agricultural use in the future. DFA has reviewed the Agricultural Impact Analysis and would like to comment that even lower classes of farmland are important to the agricultural system. In fact, these lower-class lands are especially valuable for pasture based livestock production—a practice that builds soil health over time. Should a subdivision of sorts be placed there—the land can never revert to agricultural use.	We maintain that the subject lands are an existing, disturbed, and potentially contaminated site with deteriorating infrastructure and waste heaps from historical settlement. This is reflected in the Phase 1 ESA and the MECP requirement to improve site conditions. The MECP requirement creates opportunity for a more fulsome rehabilitation effort to facilitate a 222 unit affordable housing community. This is discussed further in the revised AIA included in submission, including a detailed review of potential alternative locations (see updated Section 3.4 and new Section 6 - Assessment of Alternative Locations within AIA)
Dufferin Federation of Agriculture	Bill McCutcheon, President	Additionally, the establishment of a new community settlement area would be inappropriate in the existing context of the surrounding area and would not fit seamlessly into the agricultural nature of the area and contribute to further fragmentation and farmland loss, transportation concerns, etc. resulting in further effective farmland loss. The DFA believes that in prime agricultural areas, the only permitted uses should be agricultural uses, agriculture-related uses, on-farm diversified uses compatible with the surrounding agricultural operations and home-based businesses.	See Section 5.8 of updated AIA.

Upper Grand District School Board	Heather Imm, Senior Planner	The UGDSB does not object to the application, subject to the following conditions being imposed during future Site Plan Control/Plan of Condominium applications: - That Education Development Charges shall be collected prior to the issuance of a building permit. - That the Developer agrees to provide the Upper Grand District School Board with a digital file of the plan in either ARC/INFO export or DWG format containing parcel fabric and street network. - That the developer shall supply, erect, and maintain a sign (at its expense and according to the Board's specifications) affixed to the permanent development sign advising prospective residents about schools in the area. - That adequate sidewalks, lighting and snow removal (on sidewalks and walkways) are provided to allow children to walk safely to school or to a designated bus pickup point. - That the developer shall agree in the condominium declaration, that they will advise all purchasers of residential units and/or renters of same, by inserting the following clause in all offers of Purchase and Sale/Lease: <i>"In order to limit liability, public school buses operated by the Service de transport de Wellington-Dufferin Student Transportation Services (STWDSTS), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up students, and potential busing students will be required to meet the bus at a congregated bus pick-up point."</i> - That the developer shall agree in the site plan agreement / condominium declaration to advise all purchasers of residential units and/or renters of same, by inserting the following clause in all offers of Purchase and Sale/Lease, until such time as a permanent school is assigned: <i>"The Upper Grand District School Board welcomes families to this growing community. Please be aware that local public schools may be at capacity. As a result, students living in this area may attend a school outside their immediate neighbourhood temporarily, may be provided transportation to another school, and/or may be reassigned to a different school in the future. School assignments are based on available space and may change as the community grows."</i>	Acknowledged
Apex Archaeology Inc. Archaeology Peer Review	Alex Cassidy-Neumiller	Peer Review of the Stage 1 and Limited Stage 2 Archaeological Assessment of Chipwoods Park, Part of Lot 8, Concession 3 Upon review of the report, it is my professional opinion that CRM Lab Archaeological Services has prepared 1000719578 Ontario Inc. with a sufficient archaeological assessment report. The Stage 1 background research carried out is satisfactory for the purposes of the assessment, is completed to a level of detail typical for such studies and utilizes standard, accepted sources of information and data sets. The research includes an in depth summary of the broader cultural-historic context of the subject property, its general environmental setting, the extent of previous archaeological surveys and site documentation within the immediate vicinity of the subject property, and the identification of archaeological potential within the subject property	Acknowledged.

Apex Archaeology Inc. Archaeology Peer Review	Alex Cassidy-Neumiller	The limited Stage 2 physical assessment was conducted on the portion of the subject property to be impacted by the proposed redevelopment and included a 15m buffer beyond the proposed areas of impact. The Stage 2 physical assessment within the project area appears to have been undertaken in the appropriate manner with respect to methodology. As the project area within the larger subject property only consists of non-arable lands, these areas were test pit surveyed at standard 5m intervals, while areas of no archaeological potential due to slope, poor drainage, and/or previous disturbances were all thoroughly photo documented. The conducting of archaeological fieldwork with visible winter conditions is also addressed appropriately within the report, clearly outlining prior documentation of the impacted areas prior to the snowfall and explaining that conditions for test pit survey were not adversely impacted by the winter conditions.	Acknowledged.
Apex Archaeology Inc. Archaeology Peer Review	Alex Cassidy-Neumiller	No archaeological resources were recovered as a result of the limited Stage 2 physical assessment of the project area within the subject property. The recommendation that no further archaeological assessment is required for the assessed portion of the subject property is appropriate. The recommendation for additional Stage 2 Archaeological Assessment of the remaining areas of the subject property outside of the current project area should future below grade work be planned as these areas remain unassessed and, as such, retain archaeological potential for the discovery of archaeological resources of cultural heritage value or interest, is also appropriate. With the completion of the Stage 1 Archaeological Background Study and Limited Stage 2 Archaeological Assessment, all archaeological concerns with respect to the proposed redevelopment of the project area within the subject property appear to have been addressed.	Acknowledged.
Ontario Ministry of Citizenship and Multiculturalism (MCM)	Jason Stephenson Archaeology Review Officer	1. All lands included in the development application for a subdivision must be subject to Stage 1 inspection(Section 1.2 Standard 1) and Stage 2 survey (Section 2.1, Standard 1). Lands that can be demonstrated to be exempt from survey according to Section 2.1, Standard 2 must be appropriately documented according to Section 7.8.1, Standard 1. Please complete a Stage 1 and Stage 2 assessment for the total project area as indicated on the Development Concept Plan, or provide the appropriate documentation per Section 7. 8.1, Standard 1 to exempt any areas from Stage 2 assessment.	Revised report dated July 30, 2026 includes the total property area per comment. Note this is not a Plan of Subdivision application.
Peninsula Heritage LTD. CHER Peer Review	Chris Lemon, Senior Cultural Heritage Consultant	Introduction The CHER for Chipwoods Park provides a foundation by which to assess the Cultural Heritage Value or Interest (CHVI) of the property. The report is generally consistent with accepted CHER report content expectations by municipalities in Ontario. The report provides extensive precontact Indigenous background of the area and demonstrates an understanding of the Colonial regional history of the area. The report demonstrates familiarity with the applicable legislative and policy frameworks. Examination of the report did identify areas which would benefit from additional information in order to be deemed compliant with accepted industry standards.	Acknowledged.

Peninsula Heritage LTD. CHER Peer Review	Chris Lemon, Senior Cultural Heritage Consultant	Methodology Review of the Chipwoods Park CHER was undertaken against Ontario Regulation (O. Reg.) 9/06 (as amended by O. Reg. 569/22), the Ontario Heritage Act (OHA), and MCM standards and guidance provided in the Ontario Heritage Toolkit (https://www.ontario.ca/page/ontarioheritage-tool-kit#section-1). An objective of a peer review is to identify methodological, analytical, and reporting shortcomings that may impact the completeness of the evaluation.	Acknowledged.
Peninsula Heritage LTD. CHER Peer Review	Chris Lemon, Senior Cultural Heritage Consultant	Compliance and Methodology The report generally follows a conventional CHER structure and includes background research, policy context, and field review documentation. Legislative references are generally accurate and in keeping with industry standards, but some references are outdated and should be updated to reflect current legislative standards and MCM guidance. Overall, the report was found to place a disproportionate emphasis on legislative and archaeological background material relative to the actual cultural heritage evaluation, resulting in an imbalance between contextual information and evaluative analysis. While the scope of work and methodology employed are described, they are not applied to a fulsome extent. The report does not clearly articulate how specific built features, structures, or landscape elements were screened or evaluated under O. Reg. 9/06 criteria. The report provides little qualification as to how conclusions were reached despite providing relevant evaluation criteria.	Refer to revised CHER
Peninsula Heritage LTD. CHER Peer Review	Chris Lemon, Senior Cultural Heritage Consultant	Evaluation Limitations A shortfall in the report is the absence of a structured, criterion-by-criterion O. Reg. 9/06 evaluation of the property. While the O. Reg. 9/06 criteria are reproduced verbatim, there is no systematic application of design/physical, historical/associative, and contextual value to identified site elements. The conclusion that the property has no CHVI is not supported by a fulsome O. Reg. 9/06 analytical matrix or narrative assessment.	Refer to revised CHER (section 3.0)
Peninsula Heritage LTD. CHER Peer Review	Chris Lemon, Senior Cultural Heritage Consultant	The report was not found to provide sufficient evaluation of the existing infrastructure present on the property and to not adequately document the types and extent of existing structures. The report concludes that no built heritage resources are present, despite multiple existing buildings and structures being depicted in the photographic documentation provided of the property. The report would benefit from detailed descriptions and photo documentation of all built structures present on the property and an attempt be made to attribute each building or class of building to an architectural style or temporal construction range.	Revised per comment with additional evaluation of existing infrastructure and photo documentation (plates 70+)
Peninsula Heritage LTD. CHER Peer Review	Chris Lemon, Senior Cultural Heritage Consultant	The report should provide a discussion of age thresholds, construction periods, and integrity of all extant structures in order to fully justify the conclusion that the property does not present with CHVI. Given the property contains a large number of mobile homes (which do not present with CHVI) it is suggested that mapping be provided that outlines the general development sequence of the property.	Refer to revised CHER (section 3.1, 3.2)
Peninsula Heritage LTD. CHER Peer Review	Chris Lemon, Senior Cultural Heritage Consultant	A dedicated section should be added to address the large permanent barn-like structure. This structure appears to reflect a 20th century barn that has been subject to modification. The omission of detailed documentation and description of extant structures and completion of a fulsome O. Reg. 9/06 evaluation weakens the overall defensibility of the report's conclusion.	Refer to revised CHER (section 3.0)

Peninsula Heritage LTD. CHER Peer Review	Chris Lemon, Senior Cultural Heritage Consultant	The conclusions presented are not backed by substantive analysis. The recommendation that no Heritage Impact Assessment (HIA) be required for the property relies on unsupported findings. While the recommendation for archaeological assessment is appropriate, the cultural heritage conclusions would benefit from clearer documentation and justification.	Refer to revised CHER
Peninsula Heritage LTD. CHER Peer Review	Chris Lemon, Senior Cultural Heritage Consultant	In summary, while the property appears to be of little or no CHVI, the CHER report falls short as a defensible cultural heritage evaluation. Key deficiencies include the lack of structured application of O. Reg. 9/06 criteria, insufficient assessment and documentation of existing built features, and weak linkage between historical context and evaluative conclusions. The report should be updated to include: - Mapping demonstrating the general development sequence of the property and associated construction dates - An O. Reg. 9/06 evaluation, including justification of why or why not a criterion is met - Detailed documentation of all structures or classes of structures present on the property - Greater justification as to why the property has been found to be void of CHVI	Refer to revised CHER (section 1.4, 3.1, 3.2, 4.0)
Peninsula Heritage LTD. CHER Peer Review	Chris Lemon, Senior Cultural Heritage Consultant	Refer to Summary of Findings Table from CHER Peer Review On Next Page	

Cultural Heritage Evaluation Report Peer Review
(Peninsula Heritage LTD, Chris Lemon, Senior Cultural Heritage Consultant)
Comments Dated: December 2025
Responses Dated: July 2026

REVIEW AREA	IDENTIFIED ISSUE	IMPLICATION/RISK	REQUIRED REVISIONS	RESPONSE
Throughout Report	Inconsistent terminology: Subject Property, Project Area, Study Area, Cultural Heritage Evaluation, Cultural Heritage Assessment	Cultural Heritage Assessment, depending on project, can refer to a different type of heritage report	Ensure consistent use of terminology applicable to a CHER; or, include definitions of the various terms	Terminology revised and reference to Cultural Heritage Assessment removed
	References to methodology of a Heritage Impact Assessment, including identification of impacts to heritage resources and mitigation measures	Identification of potential impacts and identification of mitigation measures is not appropriate for a CHER level report	Remove references to methodology applicable to HIAs	Section 3.3 removed per comment
Proposed Redevelopment	Reference to permission to conduct archaeological fieldwork and brief statement on proposed changes to property	Not applicable for CHER	Remove references to archaeological fieldwork and remove statements regarding proposed alterations to property. CHERs are generally developed and worded not anticipating changes to the property in the future	Section 1.1 revised per comment
Review of Historical Records	References two portions of the study area	Unclear what this means	Remove reference to two portions of study area, or clarify what the two portions are	Section 1.4 revised per comment
	Table 1 includes ownership records for the east and west halves of Lot 8; study area appears to only be located on east half	Potential for confusion of property ownership	Remove references to west half of lot, or identify if west half of lot was part of study area property, and at what point it was severed	Table 1 revised per comment
	Entries in Table 1 do not appear in chronological order	Potential for confusion of property ownership	Reorder Table 1 to list relevant transactions applicable to the study area property, in chronological order with date of transaction	Table 1 revised per comment
Table 2	Table 2 suggests no built structures have been present on the property, per available imagery. The National Air Photo Library has images from 1969 and 1976 that depict what appears to be a structure in the approximate location of the extant wood barn structure on the property	Potential that a cultural heritage resource was not evaluated	Document the architectural styles, construction materials and chronology of the extant wood barn on the property, reference structure in O. Reg. 9/06 evaluation (see below)	Section 3.0 updated per comment ('clubhouse')
Provincial Policy Statement	The report references the Provincial Policy Statement. The Provincial Policy Statement was replaced in 2024 with the Provincial Planning Statement	Reference to outdated policy	Replace references with 2024 Provincial Planning Statement and confirm accuracy of wording in report	Section 2.0 revised per comment
Ministry of Citizenship and Multiculturalism	Section references guidelines for preparing cultural heritage resources reports under the environmental assessment (EA) process Section references an outdated version of the Ontario Heritage Toolkit	CHER not being completed under an EA Reference to outdated guidelines	Remove references to guidance for preparing reports under the EA process Replace references with current version of Ontario Heritage Toolkit and confirm accuracy of wording in report (https://www.ontario.ca/document/heritageproperty-evaluation)	Section 2.0 revised per comment
Regulation 9/06	No identification of minimum criteria requirements to be considered for Designation (per O. Reg. 569/22)	No information for reader on evaluation implications	Include statement identifying that meeting two evaluation criteria results in the property being a candidate for Designation under Part IV Section 29 of the OHA	Section 2.0 revised per comment
Scope of Work and Methodology	Very brief statement of existing conditions within the property	Limited information provided to evaluate CHVI of the property	Revise or add new section that more thoroughly describes the built features of the property and evolution of changes to the property over time. Per the Ontario Heritage Toolkit, the evolution of architectural style, construction techniques, materials, technology, associated landscapes, and other factors are important information when analyzing a heritage property. Currently no architectural or materials information is provided for extant structures on the property, particularly permanent extant structures	Section 3.1 revised per comment
	O. Reg. 9/06 criteria are reproduced but not systematically applied to property	Findings are not defensible and conclusions appear unsupported	Provide a structured, criterion-by-criterion evaluation explicitly addressing each criteria, including a statement of why or why not the criteria was met	Section 3.1 revised per comment
	Historical Context Integration - Extensive historical background is not clearly tied to the property	Historical research does not inform evaluative conclusions	Directly link historical themes and land use history to the property and landscape.	Section 3.1 revised per comment
Conclusions	Conclusions made without substantial analysis	Weakens overall report defensibility	Revise conclusions to clearly synthesize evidence and evaluation findings following completion of O. Reg 9/06 evaluation	Section 4.0 revised per comment
	Recommendation that no HIA is required is insufficiently justified	May not satisfy municipal or agency review requirements	Provide clearer rationale or revise recommendations pending strengthened O. Reg. 9/06 evaluation	Section 4.0 revised per comment
Plates	Lack of documentation of architectural and material details of permanent built structures	Limited data available to inform evaluation	Include photo documentation, including architectural and material details, and all elevations of permanent built structures (e.g., the barn structure depicted in Plate 21, that appears to be located in the approximate location of a potential structure on 1969 and 1976 aerial imagery)	Documentation added per comment (plates 70+)