



January 24, 2025

Board of Directors

Grand River Conservation Authority
400 Clyde Road, PO Box 729
Cambridge, ON
N1R 5W6

Subject: Concerns Regarding Delays in GRCA and Broader Permitting Processes

Dear Members of the Board,

I hope this message finds you well.

My name is John Vanderwoerd, and I am the Design Manager at HFH Inc., a Design + Build company based in Elora, Ontario. With over 18 years of experience in the Design and Planning industry, I have worked extensively with conservation authorities, municipal authorities, and other governing ministries throughout Southern Ontario throughout my career. I am writing to express the growing frustration within our industry regarding delays in approval processes and to provide a specific example of how GRCA has contributed to these challenges.

Project Delays and GRCA's Role

A current project, undertaken for Black Creek Livestock in Wellesley, illustrates the issues we're facing. HFH Inc. was retained to design and build a new office for Black Creek Livestock, and this project has been fraught with delays, causing frustration for both our team and our client. While I acknowledge recent progress by GRCA staff on this project, the overall experience highlights declining service levels that are becoming increasingly common across governing bodies. These delays impact project timelines, disrupt on-site schedules, and make it nearly impossible to forecast accurate construction start dates.

Timeline of Events

To provide context, the project began with a pre-consultation submission to the Township of Wellesley on July 13, 2023, aiming to break ground by spring 2024. Although there were challenges involving archaeological assessments and a zoning bylaw amendment, we submitted the Site Plan Application (SPA) in April 2024 following the ZBA's approval. Throughout this process, Wellesley demonstrated a commitment to streamlining approvals, working with us to expedite the SPA and target a July 1, 2024, construction start.

We intentionally designed the site plan to avoid GRCA-regulated areas, aiming for a smooth review process. However, during the review of our initial submission, GEI Consultants advised that a drain into the regulated area was necessary for the Site Servicing & Drainage Plan's approval. Until this point, Chris Foster-Pengelly had been providing clearance letters, and the process was progressing as planned. Once the drain issue arose, delays began to accumulate.

It took over two months—three if we include prior awareness—for GRCA to clarify the requirements for approvals. As of November 15, 2024, the GRCA permit approval remains the only outstanding item for the Site Plan Application, further delaying the project. Despite efforts by Brett Pond from Van Harten to arrange meetings and resolve outstanding items, GRCA staff have been unresponsive to a large number of calls and emails. During this time formal comments were



received from staff but there was no willingness to have any discussions to work things out. They kept their distance behind emails and did not entertain any personal connections. (please refer to the Appendix for a timeline of events)

Questions for GRCA

To identify potential solutions, I would appreciate clarity on the following:

1. **Concurrent Reviews:** Why does GRCA wait for municipal engineering reviews to be completed before starting its own review? In my 18 years of experience, this is the first instance of such a practice.
2. **Standard Timelines:** Why did it take over two months—three if including prior awareness—to provide clear direction on GRCA's requirements for this project?
3. **Communication Protocols:** What is GRCA's standard protocol for responding to calls and meeting requests? Despite multiple attempts, Brett Pond never received a response or call back to arrange a meeting.

Broader Concerns

The issues experienced with GRCA are symptomatic of larger systemic challenges within the permitting process:

1. **Inconsistent Timelines:** Approval durations vary significantly across governing bodies, making it difficult to predict timelines and plan construction schedules. Even with set timelines, adherence has become increasingly inconsistent.
2. **Communication and Coordination:** Delayed responses and poor coordination among departments (e.g., transportation, conservation, and civil engineering) result in avoidable bottlenecks.
3. **Economic and Operational Impacts:** These delays lead to increased project costs, inefficiencies for construction crews, and growing frustration among industry stakeholders.

Conclusion

We deeply value the important work GRCA does to protect and manage natural resources. We also understand the complexities of balancing development with conservation. However, the current delays and lack of responsiveness are unsustainable and pose significant challenges to the construction industry.

We respectfully request that these concerns be reviewed at the board level to address underlying issues and improve service levels moving forward. Should you require additional information or wish to discuss this matter further, please do not hesitate to reach out.

Thank you for your time and consideration.

Sincerely,

John Vanderwoerd
Design Manager
519-400-5646
john.v@hfhinc.ca



APPENDIX

1. May 24, 2024

- **Heading:** Review Comments for Site Plan Application
- **Sender:** Tim Van Hinte to John Vanderwoerd
- **Summary:** Tim outlined Planning Department comments, including comments that required a new drain to extend into the GRCA-regulated zone.

2. July 5, 2024

- **Heading:** Revised Submission for Site Plan
- **Sender:** John Vanderwoerd to Tim Van Hinte (CC Chris Foster-Pengelly)
- **Summary:** John submitted revised plans showing the new drain into the GRCA-Regulated Zone.

3. July 25, 2024

- **Heading:** Review Comments on Site Plan
- **Sender:** Tim Van Hinte to John Vanderwoerd
- **Summary:** Tim completed the review, stating that the Planning Department comments were satisfied. Engineering review comments were included, and Chris was asked to send any further comments.

4. July 25, 2024

- **Heading:** Inquiry on Permit Requirement
- **Sender:** John Vanderwoerd to Chris Foster-Pengelly
- **Summary:** John asks Chris to confirm if a formal GRCA permit application is required or if it's a step in the site plan approval process.

5. July 27, 2024

- **Heading:** Clarification on Permit Requirement
- **Sender:** Chris Foster-Pengelly to John Vanderwoerd
- **Summary:** Chris references Outdated drawings and GRCA comments indicating no permit is needed if activities remain outside the regulated area.

6. July 29, 2024

- **Heading:** Updated Site Plan Submission



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- **Sender:** John Vanderwoerd to Chris Foster-Pengelly
 - **Summary:** John resends the plans provided on July 5th and points out to Chris that the latest plans are within the GRCA-Regulated Zone. He requests clarification on GRCA approval requirements.

7. July 30, 2024

- **Heading:** GRCA Permit Requirement Confirmation
- **Sender:** Chris Foster-Pengelly to John Vanderwoerd
- **Summary:** Chris confirms GRCA's requires a Permit but notes that he will confirm with technical staff about what the requirements will be, such as storm water quantity controls, outlet details, erosion and sediment controls.

8. August 7, 2024

- **Heading:** Follow up on Technical Requirements for GRCA Approval
- **Sender:** John Vanderwoerd to Chris Foster-Pengelly
- **Summary:** John follows up and asks Chris to confirm if additional technical requirements are needed for GRCA approvals before resubmitting site plan drawings.

9. August 12, 2024

- **Heading:** Request for Circulation of Feedback
- **Sender:** Chris Foster-Pengelly to John Vanderwoerd
- **Summary:** Chris informs John that GRCA technical staff are reviewing submission requirements and promises to forward the feedback once received.

10. August 16, 2024

- **Heading:** Follow-up Technical Requirements for GRCA Approval
- **Sender:** John Vanderwoerd to Chris Foster-Pengelly
- **Summary:** John follows up with Chris.

11. August 29, 2024

- **Heading:** Follow up & Timeline Request
- **Sender:** John Vanderwoerd to Chris Foster-Pengelly
- **Summary:** John follows up, asking for an expected timeline for GRCA comments from Ecology and Engineering to keep the project moving forward.

12. September 6, 2024

- **Heading:** Phone call Follow Up



- **Sender:** Chris Foster-Pengelly to John Vanderwoerd
- **Summary:** John calls Chris who verbally commits to providing comments the following week.

13. September 16, 2024

- **Heading:** Follow-up
- **Sender:** John Vanderwoerd to Chris Foster-Pengelly
- **Summary:** John follows up after the committed timeline for comments has passed, requesting updates to maintain project momentum.

14. September 18, 2024

- **Heading:** Escalation to Beth Brown
- **Sender:** John Vanderwoerd to Beth Brown
- **Summary:** John escalates the delay to Beth, emphasizing the project's prolonged timeline and its impact.

15. September 18, 2024

- **Heading:** Beth responds to Escalation
- **Sender:** Beth Brown to John Vanderwoerd
- **Summary:** Beth apologizes for delays due to the high volume of submissions and staff vacancies but promises to provide an update as soon as possible.

16. September 23, 2024

- **Heading:** Call Chris
- **Sender:** John Vanderwoerd to Chris Foster-Pengelly
- **Summary:** John leaves a voicemail with Chris requesting an update on the status

17. September 24, 2024

- **Heading:** Follow Up Email
- **Sender:** John Vanderwoerd to Chris Foster-Pengelly and Beth Brown
- **Summary:** John sends an email to voice the Owner's frustration with the process and the fact that we have waited 8 weeks without a clear understanding of what reports and documents are required for a successful application. John acknowledges the staffing challenges. John voiced concern that shovels may not be in the ground until Christmas and how these delays are affecting HFH's Clients' business as well as HFH's crew schedule and workforce.

18. September 24, 2024



- **Heading:** Assurance of Follow-up
- **Sender:** Chris Foster-Pengelly to John Vanderwoerd
- **Summary:** Chris acknowledges the delay and promises to follow up the next day after consulting with technical staff.

19. September 25, 2024

- **Heading:** GRCA Application Required Documentation
- **Sender:** Chris Foster-Pengelly to John Vanderwoerd
- **Summary:** Chris provides details on what the requirements for a successful application are after consulting with technical staff.

20. September 27, 2024

- **Heading:** Back and Forth Clarification
- **Sender:** John Vanderwoerd to Chris Foster-Pengelly and Chris Foster-Pengelly to John Vanderwoerd
- **Summary:** John requests clarification on Dewatering and Chris provides a response on the requirements and why.

21. October 10, 2024

- **Heading:** Updated Materials for Site Plan
- **Sender:** John Vanderwoerd to Tim Van Hinte (CC Chris Foster-Pengelly)
- **Summary:** John submitted updated materials, including stormwater management, dewatering plans, and other documents, ensuring they meet GRCA requirements.

22. October 11, 2024

- **Heading:** Confirm receipt and additional requirements
- **Sender:** Chris Foster-Pengelly to John Vanderwoerd
- **Summary:** Chris confirms receipt of resubmission and requests calculations of Rip-Rap and signed letter from Neighbour to complete work on their property.

23. October 17, 2024

- **Heading:** Rip-Rap Calculations
- **Sender:** John Vanderwoerd to Chris Foster-Pengelly
- **Summary:** John provides Rip-Rap calculations and advises that the Owner is working on getting a letter from the neighbour but having challenges as he is in Florida cleaning up from the Hurricanes.



24. October 24, 2024

- **Heading:** Begin review
- **Sender:** Chris Foster-Pengelly to John Vanderwoerd
- **Summary:** Chris confirms the review has begun and that two separate permit applications are now required as some work will be on the neighbouring property.

25. October 29, 2024

- **Heading:** Signed letter from Neighbour
- **Sender:** John Vanderwoerd to Chris Foster-Pengelly
- **Summary:** John provides signed letter from Neighbour.

26. October 30, 2024

- **Heading:** Receive additional comments from Engineers
- **Sender:** Tim Van Hinte to John Vanderwoerd (cc Chris Foster-Pengelly)
- **Summary:** Tim Provides additional comments from the Municipal Engineers for the Site Plan Approval.

27. October 31, 2024

- **Heading:** Submitting GRCA Permits & hand over to Angela
- **Sender:** Chris Foster-Pengelly to John Vanderwoerd
- **Summary:** Chris provided a link to submit for two permit applications and also noted that Angela Wang will be taking over management of the file.

28. November 7, 2024

- **Heading:** Revised Site Plan Submission
- **Sender:** John Vanderwoerd to Tim Van Hinte (cc Chris Foster-Pengelly)
- **Summary:** John sent revised drawings per the latest comments.

29. November 15, 2024

- **Heading:** Engineering Comments Received
- **Sender:** Tim Van Hinte to John Vanderwoerd
- **Summary:** Tim shared the engineering comments from the Township, confirming **no further revisions are needed**. The next step is the site plan agreement, pending GRCA satisfaction.

30. November 21, 2024



- **Heading:** GRCA Comments
- **Sender:** Angela Wang to John Vanderwoerd
- **Summary:** Angela acknowledges GRCA permits have been received and provides comments on them.

31. November 26, 2024

- **Heading:** Provide revised drawings to per GRCA comments
- **Sender:** John Vanderwoerd to Angela Wang
- **Summary:** John provides Angela with revised drawings based on the comments received. Kindly request an expedited review.

32. November 26, 2024

- **Heading:** Drawings received
- **Sender:** Angela Wang to John Vanderwoerd
- **Summary:** Angela responds that drawings have been received and she has asked for an expedited review from staff.

33. November 26, 2024

- **Heading:** Request meeting with reviewing staff
- **Sender:** Brett Pond to Angela Wang
- **Summary:** Brett Pond (Van Harten – Site Servicing) requests a meeting with review staff to discuss the response matrix. Brett provided 6 days that he was available all day (Nov 29, Dec. 2,3,4,5,6).

NO MEETING

34. December 11, 2024

- **Heading:** Follow up on the application
- **Sender:** John Vanderwoerd to Angela Wang
- **Summary:** John sends an email following up on timing for the review.

35. December 13, 2024

- **Heading:** Provides update
- **Sender:** Angela Wang to John Vanderwoerd
- **Summary:** Angela advised that the comments should be available the following week.

36. December 13, 2024



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- **Heading:** Please can we have a meeting
 - **Sender:** Brett Pond to Angela Wang
 - **Summary:** Brett responds by pleading for a meeting with the reviewer so that we can hash out the final items and avoid another set of resubmissions.

STILL NO MEETING

37. December 19, 2024

- **Heading:** 4th Submission comments
- **Sender:** Angela Wang to John Vanderwoerd
- **Summary:** Angela sends another round of comments.

38. December 23, 2024

- **Heading:** Update the Owner
- **Sender:** Brett Pond to Jeff Jones & John Vanderwoerd
- **Summary:** Brett sends an email to Jeff & John providing an update before the Christmas break. *"...I have sent them 4 emails requesting a meeting to discuss and have called them 4 times, but Angela never picks up. I will continue to push them as a simple discussion/meeting with the technical reviewer would clear all of this up"*.

39. January 9th, 2025

- **Heading:** Please can we meet
- **Sender:** Brett Pond to Chris Foster-Pengelly (CC Angela Wang)
- **Summary:** Brett sends an email to Chris as he has not heard from Angela *"...I would like to escalate the above project. I have been requesting a meeting with the GRCA (planning and technical review) since late November to discuss the first submission comments and recently received second submission comments. When you have capacity can you please advise on the GRCA's availability to meet next week to discuss the comments? I want to ensure our team and the GRCA are on the same page regarding this application as the attached 2nd submission comments could have likely been hashed out in a meeting. Appreciate your help on this file."*

40. January 10th, 2025

- **Heading:** Tim Van Hinte calls Chris
- **Sender:** Tim Van Hinte to Brett Pond and John Vanderwoerd
- **Summary:** *"Hi guys, I talked to Chris on the phone this morning – he is going to give you a call Brett to discuss."*

41. January 13th, 2025

- **Heading:** Brett Pond provides update



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- **Sender:** Brett Pond to John Vanderwoerd (CC Jeff Jones)
 - **Summary:** *“Hi John, I spoke with Eric from the GRCA. I was not able to talk the GRCA out off another submission; however, they mentioned they will try their best to expedite the review. Should they require any additional updates to the material following this submission Eric said engineering would call me and we can hash everything out via. a call. I will revise and issue everything tomorrow for a resubmission to the GRCA.”*

42. January 17th, 2025

- **Heading:** GRCA has no further comments
- **Sender:** Angela Wang to Brett Pond & Tm Van Hinte (CC John Vanderwoerd, CC Jeff Jones)
- **Summary:** *“Please find attached GRCA’s comments on the latest submission. Our previous comments have been addressed satisfactorily, and we have no further comments on the site plan application at this stage. We will begin reviewing the GRCA permits and will reach out if we need anything else. ”*

END