

# Attachment #12

## Agency and Stakeholder Detailed Comments

PDP 26-25

### **Internal Departments**

#### **Town of Whitby Engineering Department**

##### **Official Plan Amendment Application**

Subject to the acceptance of the deletion by the Region of Durham, Transportation and Engineering Services has no objection to the proposed Official Plan Amendment.

##### **Zoning By-law Amendment**

Engineering Services has no objection to the proposed Zoning By-law Amendment.

##### **Draft Plan of Subdivision**

Engineering Services does not object to the proposed Draft Plan of Subdivision subject to the comments and Proposed Conditions of Draft Approval, as outlined further on Attachment #13.

##### **Site Plan Application and Agreement Requirements**

Engineering Services has provided additional comments to be addressed to their satisfaction prior to final acceptance of the Site Plan.

##### **General Comments**

1. The Consulting Engineer or Qualified Professional shall confirm the details of all existing above and below grade infrastructure relevant to the proposed design. Existing details shall be confirmed in the field by a method determined by the Consulting Engineer in consultation with the Town. Acceptable methods include, but are not limited to: topographical surveys, locates, measure downs, sub- surface utility engineering (SUE) investigation Quality Level A (QL-A) also referred to as daylighting to determine the horizontal and vertical location.

The Consulting Engineer or Qualified Professional agrees that any as-built information provided by the Town is for informational purposes only. Items to be confirmed in the field by the consulting engineer shall include, but not be limited to:

- Sewer slopes, inverts, depths, and diameter.
  - Utility depths and location
  - Location of catchbasin leads
  - Watermain and fire hydrant, depth, and locations
  - Hydro pole guy wires
2. Remove Town of Whitby logo on the Engineering Drawing Set title block.

3. Ensure that details for all OPSD and Town Standard references are included in the drawing package.
4. Fix overlapping and cut off texts.
5. Correctly identify all easements on all applicable plans. Easements shall be labelled on all engineering drawings. There currently is no “existing right-of-way” on this property.
6. Include the North and South Pond cross section drawings, found within the Stormwater Management Report, in the Engineering Drawing Set.

### **Grading Plan**

7. It is recommended that the spot elevation font be made smaller to make the drawing more legible.
8. Identify and/or include in the legend what “BO” stands for (i.e. BO.155.96).
9. Show and label the following:
  - Line work for swales,
  - Swale inverts,
  - Internal walkways/sidewalks to be labelled or hatched.
10. Except for enhanced swales, the minimum swale slope is 2% as per Town Standards. Review and revise accordingly.
11. The minimum paved area slope is 0.5% as per Town Standards. Review and revise accordingly.
12. Any proposed retaining wall of more than 0.6m in height shall include a guard rail and be designed and approved by a Structural Engineer. Please refer to the Town of Whitby Design Criteria and Engineering Standards – Section ‘E2.00 Retaining Walls’. Provide elevations, wall details, and cross sections for all retaining walls.

Note that the retaining wall design shall adhere to the following:

- The retaining wall, including footing, shall be built completely within private property. Please add a note in the drawing stating that the retaining wall including its footing will be built completely within private property.
- Demonstrate how the drainage from the retaining wall will be dealt with. If drainage is directed onto the adjacent property, a letter of consent from the neighbouring property owner will be required stating acceptance of the additional drainage to their property.
- As identified in the stormwater management comments, the retaining wall is lower than the wetland within the proposed Open Space Block. The retaining wall design shall specify how the hydrostatic

pressures and other considerations will be addressed.

13. All external drainage that is currently draining onto the subject property under existing conditions shall be accounted for.
14. Minimum and maximum slopes of roadside ditches and embankments shall be as per Town of Whitby Design Criteria and Engineering Standard. Refer to Section C3.06 Ditch Criteria for roadside ditch design. Review and revise accordingly.
15. Clearly identify the curb termination location on driveway entrances and use the appropriate OPSD. OPSD details shall be included in the Engineering Drawing Set.
16. Include grades/spot elevations on the stormwater management ponds.

### **Servicing Plan**

17. Service connections and work proposed within the Town's right-of-way shall be restored as per Town of Whitby Standard Drawing 404.50.
18. Provide the entire stormwater management system Operation and Maintenance Manuals.
19. Provide orifice plate details.
20. Confirm and note who is responsible for installing the proposed 300mm watermain along Garrard Road.

### **Erosion and Sediment Control Plan**

21. A separate Erosion and Sediment Control Plan is required for various stages of construction – pre-grading, servicing, and post-servicing.
22. Provide site contact information (note 20 – Erosion and Siltation Control Plan General Notes).
23. Show proposed stockpile location, if any. Note, the maximum stockpile height is 5.0m.
24. Identify how the infiltration galleries are going to be protected during the duration of the construction works.
25. Mud Mat shall be as per the Town's Engineering Standard Drawing. See attached. Note, this standard may be subject to further revision by Engineering Services.

### **Southbound Left Turn Lane Preliminary Design**

26. Through lane width to be increased to 3.5m, consistent with Town of Whitby Standards and lane widths to the north of the development.
27. Left turn lane width to be increased to 3.25m, consistent with Regional and Industry standards.

## **Stormwater Management Report**

28. A revised Stormwater Management Report is required. See attached Storm Water Management Report (SWMR) comments from the Town's Water Resources Engineer.

Please include the following with your next submission:

- An itemized response matrix stating how the above comments have been addressed.

## **Town of Whitby Planning Services - Landscape**

### **Subdivision Application (DEV-31-24, SW-2024-04):**

The drawings in this package will reflect the Conditions of the Draft Plan Approval and will illustrate street tree planting within the public right of way and all works to be implemented on Town lands and lands to be conveyed to the Town, such as the Enhancement Plantings and Wetlands.

#### **Cost Estimate:**

These drawings should be accompanied by a cost estimate for all proposed landscape works with the Subdivision. Required landscape works are secured for at 100% of their estimated value.

Plans are required to be submitted directly to the landscape architect in the Planning Department for circulation, review, and approval.

#### **General Comments:**

Please provide a Cover Sheet, illustrating Viewports and Match Lines referencing all relevant drawings.

#### ***Storm Ponds Drawings(L1-L5)***

Please refer to Markups provided.

#### ***Landscape Package (L6-L19):***

Please refer to Markups provided.

TPZ and hoarding to be shown correctly.

Future R.O.W and features to be conceptually illustrated. Cash in lieu may be required for future Street Trees. To be included on the Cost Estimate.

#### ***Compensation Area Drawings (LC1-4, and LCD1):***

The title block should read "Enhancement Planting" to match proposed approach by EIS. The EIS suggests an Enhancement Planting area at the Northeast corner of the site. This area has not been included in the drawings. Please refer to markups provided on LC-1.

#### ***Wetland Drawings (W1-W7):***

Please refer to Markups provided.

### **Tree Inventory, Arborist Report & TPP:**

1. Revise the TPP to eliminate unnecessary Tree Protection fencing proposed along Garrard Rd. Please refer to the Markup provided.
2. Coordinate and illustrate the full extent of the TPP with ESC fencing in all areas which are to be disturbed. This is particularly important on the east and south edge to protect the neighbouring trees and existing Natural Heritage Systems. Prior to any site alterations, all Tree Protection hoarding must be installed. Planning Department's Landscape Staff must be notified to inspect and confirm these installations.
3. As mentioned on the Addendum Memo, an appraisal is required for the 8 Municipal trees to be removed. This is to be generated by an ISA certified Arborist, reviewed and confirmed by Town's Forestry Department Arborists, in advance of any removals occurring on site.

Town of Whitby Landscaping has requested certain conditions, which have been incorporated into Proposed Conditions of Draft Approval, as outlined further on Attachment #13.

### **Town of Whitby Fire and Emergency Services**

1. Clarify OBC Matrix 3.07 and 3.10 regarding number of streets building required to face vs design criteria.
2. Identify building Principal Entrances on site plan.
3. Indicate the distance from the proposed fire hydrants on site plan to the proposed fire department connections. Distances shall be in compliance with OBC 3.2.5.5.
4. The fire access route shall be provided in accordance with OBC 3.2.5.6.
5. A Water supply shall be provided to all three buildings as per OBC 3.2.5.7.
6. Please note an Integrated Testing Coordinator may be required to provide an integrating testing plan and date of integrated system testing as per CAN/ULC S1001 for all buildings containing more than one fire and life safety system within it that are integrated with each other.

### **Town of Whitby Development Finance**

The following pertains to Town of Whitby Development Charges only, based on current Provincial legislation and Town of Whitby by-laws (subject to change).

This development will also be subject to Region of Durham development charges and DDSB/DCDSB education development charges.

## **Development Charges**

- Will be owing for both residential and non-residential development.
- Under Section 26.2 of the Development Charges Act.
  - The base DC rate(s) will be set as of the Site Plan application **submission** date.
  - Interest will accrue on the base DC rate(s), from the date of site plan application submission until the date of building permit issuance. Per the DC Act, the interest is set at Prime +1% adjusted quarterly.
  - The applicant has 18 months from the date of Site Plan application **approval** to obtain a building permit. Otherwise, Section 26.2 no longer applies, and instead the applicable DC rate(s) are the current posted rates in effect as of the building permit issuance date.
- If a building is being demolished to make way for this redevelopment, the applicant has 5 years from the date that the demolition permit was issued, to obtain the new building permit to qualify for a redevelopment credit.

## **Parkland Dedication / Cash-in-Lieu**

Shall be applicable as per the Planning Act and Town of Whitby By-Law for both residential and non-residential development.

- If utilizing a CIL, a land appraisal is required at the cost of the developer and will remain current for a maximum period of one (1) year.
- If CIL has previously been applied, a reduction in the amount owing will be applied.
- If CIL has not previously been applied, only the incremental residential units are used for the calculation of the CIL value.

## **Town of Whitby Planning Services – Urban Design**

No comments.

## **Town of Whitby Strategic Initiatives**

### **Economic Development Comments**

Economic Development Staff continue to be fully supportive of this development proposal. The proposed industrial development is closely aligned to the Whitby Economic Development Strategic Plan and offers an excellent opportunity for Whitby to attract high-value employment generating uses to the North Whitby (Brooklin) Employment Area.

The Town of Whitby has launched a Concierge Program for qualifying non-residential development proposals that offer a significant economic opportunity for the community. Based on the proposal submission, this project may qualify for the Concierge Program. We encourage the proponent to reach out to the Economic Development Department to discuss further.

Staff actively work with businesses (new and existing) that are looking for this type of industrial space in the Town of Whitby. Staff are eager to work with the proponent to market the proposed space to businesses that align with our key economic sectors.

### **Sustainability Comments**

Sustainability Staff acknowledge and appreciate the sustainability considerations outlined in both the Whitby Green Standard (WGS) Checklists that highlights the Applicant's intention to comply with Tier 1. We are happy to see a few Tier 2 criteria being considered.

Sustainability Staff will require an updated WGS Checklist based on the comments below to demonstrate that the requirements of Tier 1 have been satisfied:

### **Draft Plan of Subdivision**

Plans and numbers are provided in the table in Section 3.1 of the Sustainability Rationale Report. However, a lot of these are missing from the Whitby Green Standard checklist in the Excel document. Please add the appropriate documentation to the plans and number column, where applicable.

SW1.1 – In Table 1 of the Sustainability Rationale Report, it appears the description of this Tier 1 criterion was not accurately reflected in this document.

Please ensure the description matches what's provided in the Draft Plan of Subdivision Checklist. Further comments were provided by Strategic Initiatives which shall be addressed prior to final acceptance of the Site Plan.

### **Town of Whitby Building Division**

Unless other written direction is provided by the Town of Whitby to the Applicant or their Agents, it is the responsibility of the Applicant to ensure the comments provided by the Building Division are addressed prior to the submission of the building permit application.

### **Town of Whitby – Community Services – Parks Planning and Culture Division**

#### **Official Plan**

The Town of Whitby Official Plan, as amended, does not identify the need for a park in

the location of the proposed development. As such, and as noted through the Town pre-consultation process, the Parks department will be seeking Cash-in-Lieu of parkland conveyance, discussed below.

### **Cash in Lieu of Parkland**

The Town will be seeking Cash-in-lieu of Parkland in accordance with the Planning Act, as part of the subdivision agreement.

### **Open Space**

All open space blocks (3 & 4) are to be dedicated to the Town as Open Space blocks and be free and clear of any encumbrances.

Parks Planning has requested certain conditions, which have been incorporated into Proposed Conditions of Draft Approval, as outlined further on Attachment #13.



## **External Agencies**

### **Central Lake Ontario Conservation Authority (CLOCA)**

CLOCA staff have reviewed this application for consistency with the natural hazard policies of the Provincial Policy Statement and for conformity with Ontario Regulation 41/24 of the Conservation Authorities Act. Based on our review of the circulated materials we offer the following comments on the applications submitted:

#### **Official Plan Amendment and Zoning By-law Amendment**

CLOCA Staff have no further comments at this time related to these applications.

#### **Draft Plan of Subdivision**

CLOCA staff recommend that any approval of the proposed plan of subdivision be subject to the draft plan conditions on behalf of Central Lake Ontario Conservation Authority (refer to Attachment #13).

### **Region of Durham (Planning and Works)**

The planned future east-west Type 'C' Arterial Road connecting Thickson Road to Thornton Road as designated in the Whitby OP is also designated as a future east-west Type 'C' Arterial Road on Map 3b - Road Network in the recently approved Regional Official Plan (Envision Durham).

The Town of Whitby intends to amend Envision Durham to delete the future east-west Type 'C' Arterial Road as part of the OPA process. If Council approves the deletion of the arterial road, the OPA would need to address:

1. Amendments to Whitby OP Schedule 'D'- Transportation and Schedule 'P'- Taunton North Community Secondary Plan; and
2. Amendments to Envision Durham Map 3b-Regional Network.

### **Bill 23 Proclamation of the Region of Durham**

Please be advised that effective January 1, 2025, the Region became an upper-tier municipality without planning responsibilities. As such, the comments pertaining to conformity and consistency with the Region of Durham Official Plan and provincial plans and policies and those comments relating to the Region's delegated provincial plan review responsibilities now fall under the purview of the area municipalities.

### **Regional Servicing**

Sanitary servicing capacity is allocated at the time of signing a servicing agreement and is available on a first come first served basis. In accordance with the Region's Sewer Use By-Law, we will not permit foundation drains to connect to the sanitary sewer system.

The applicant must notify the Region of changes in the proposed intended manufacturing or processing uses.

The Region will require the applicant to provide information associated with the anticipated water consumption and the anticipated sanitary sewage to be discharged to the sanitary sewer system to determine if there is adequate capacity within the downstream sanitary sewer system or if any upgrades will be required.

### **Functional Servicing Report**

The Region has reviewed the Functional Servicing Report, (FSR) prepared by WSP Canada Inc., dated September 6, 2024, submitted to support the proposed development. We offer comments on the FRS and servicing Mark-ups in Attachments 1 A through F to this letter.

### **Appendix C Sanitary Design Sheet**

Due to downstream sanitary sewer constraints, the existing sanitary sewer was designed with a design flow rate of 0.92 l/s/ha gross area, for all of the contributing lands on the west and east side of Garrard Road. All sanitary sewers north of existing sanitary manhole M24-0012, should be designed using the Region's standard flow rate of 2.08 l/s/ha gross area. Regardless of the flow rate being used, no section of proposed sanitary sewer shall be greater than 300mm dia. The sanitary drainage area to be used in calculations shall be the size of the Block not the size of the buildings. Block 1 has a gross area of 6.89 ha and Block 2 has gross area of 20.29 ha.

### **Garrard Road 300 mm Watermain Extension and 200 mm Sanitary Sewer – Plan and Profile Drawings**

- Update the drawings with hydrants spaced 75 metres, for a maximum hose length of 37.5 metres measured along the lengths of the watermain. Update the watermain data chart accordingly.
- Correct the direction of the proposed sanitary sewer inverts.
- Confirm sizes for the proposed sanitary sewer based on the criteria noted above.
- The proposed inverts for the proposed internal sanitary sewer to Buildings 1 and 2 shown on Figure 5 look to be incorrect and should be rechecked.

### **Drawing Number PP-1 STA 0+00 to 0+290**

- Maintain a minimum watermain depth of 1.80 m to avoid the use of the proposed 45-degree vertical bends. Provide a minimum of 0.25m vertical clearance as the proposed watermain crosses over the proposed sanitary sewer.
- The proposed watermain location looks to conflict with the existing hydro poles.

### **Drawing Number PP-2 STA 0+260 to 0+570**

- Riser connections as per S-100.020 are required for the residential properties of 4785, 4755 and 4725 Garrard Road.
- A safety platform is required in all maintenance holes greater than 5.0 metres in depth. Label the RIM elevation and size of the proposed sanitary maintenance holes MH-4 and MH-5.

### **Drawing Number PP-3 STA 0+440 to 0+707**

- Lower the proposed sanitary sewer from SAN MH -6 to existing MHM24-0012 to meet the Region Standard minimum depth of 2.15 metres.
- Refer to the attached as-built drawing, label the RIM elevation and show the existing safety grate. A drop structure as per Region Standard S-100.080 into MH-M24-0012 will be required.
- Revise the drawing to reflect the existing downstream 300 mm dia. sanitary sewer as per the following existing inverts: W Inv.146.63, S Inv. 146.53.
- The pipe inverts are labelled south and east and they should be south and north.
- Refer to As-built drawings and report the sewer inverts pipe size, grade bedding information of the existing 300 mm dia. sanitary sewer @ 0.50%.
- A safety platform shall be required in all maintenance holes greater than 5.0 metres in depth. Label the RIM elevation and size of the proposed sanitary maintenance holes MH-5.
- Label the existing 200 PVC sanitary service extension and report the west invert at MH-M24-0012.

### **Site Servicing Plans**

- The 300 mm watermain shown on drawings SS-1 and SS-2 along Garrard Road is not existing. This watermain should be part of this development.
- Label the proposed mechanical rooms and refer to the applicable Region's standard.
- The Region's comments are based on known information at this time and are subject to change. Additional comments will be provided upon subsequent submissions.

### **Transportation**

The Region has reviewed the proposed applications from a transportation perspective.

The proposed Town of Whitby Official Plan Amendment to delete the east-west midblock Type 'C' Arterial Road from Thickson Road to the Whitby/Oshawa boundary was reviewed and assessed through the City of Oshawa's Stevenson Road North, from Taunton Road to Conlin Road, Class Environmental Assessment Study.

As part of the study, a Midblock Arterial Needs and Justification Assessment Report (September 2024) and Future Transportation Conditions Report (August 2024), were prepared by the City of Oshawa's consultant team (Gannett Fleming and TraffMobility) to review the east- west Type 'C' Arterial Road from Thickson Road to Stevenson Road. A Technical Advisory Committee (TAC) comprised of Regional, Town of Whitby, and City of Oshawa staff was formed as part of the Class EA, in part to review these studies as they progressed.

### **Transit**

1. Durham Region Transit (DRT) is currently working with the Town of Whitby on stop locations at Conlin Road and Garrard Road. Ensure the following existing/ proposed transit stops are protected at locations:

- a. Conlin Road eastbound at Garrard Road, east of Garrard Road.
  - b. Garrard Road northbound at Conlin Road, south of Conlin Road.
2. Ensure there is sufficient levelled space between Conlin Road and the proposed North pond to accommodate a bus stop. See the attached Drawing S-12 for detailed stop requirements
3. Sidewalks should be built along the south side of Conlin Road and the east side of Garrard Road to ensure pedestrian access to area transit stops.
4. Please ensure that all protected bus stop locations are indicated on future site plan submissions for clarity and accessibility.
5. TIS Section 3.2.2 - DRT Routes 920 and 409 now serve the Conlin Road and Garrard Road intersection. Please update the TIS accordingly.

### **Conclusion**

The proposed amendment would permit the deletion of the planned east- west midblock Future Type 'C' Arterial Road, south of Conlin Road in the Town of Whitby Official Plan to facilitate the development of an industrial draft plan of subdivision for the purposes of and warehousing manufacturing uses. The Region is supportive of development which will facilitate the use of vacant employment lands for economic growth and employment opportunities.

The Region's detailed review of the proposed development has identified some concerns and as such, we will require the applicant to submit a revised Functional Servicing Report and address all the Region's servicing Mark-ups as set out in Attachment 1 A through F.

We have also identified that a reciprocal Regional Official Plan Amendment application is required to delete the future east-west midblock Type 'C' Arterial Road from Map 3b-Road Network in the Regional Official Plan. Post Bill 23, the Town of Whitby is responsible for processing such amendments and will now be the approval authority for making a decision on the related ROPA application.

Additional information regarding the Official Plan Amendment application was provided to the Region of Durham and they provided the following revised comments:

Further to the Region of Durham's preliminary comments dated February 19, 2025, Regional and Town staff met on May 7, 2025, to discuss the Region's transportation comments with regards to the proposed deletion of the planned east-west midblock Future Type 'C' Arterial Road from Thickson Road to Whitby/Oshawa boundary.

The purpose of the above noted meeting was to clarify the timing of future transportation infrastructure projects. As such, we offer updated transportation comments for the proposed development applications. The Region's previous

comments, provided for the subdivision proposal with respect to Regional servicing and Transit remain applicable to the development.

As previously noted, the Region has been working in collaboration with the City of Oshawa in the review of the proposed deletion of the east-west midblock Type 'C' Arterial Road from Thickson Road to Stevenson Road. The Region is satisfied that the impacts stemming from the deletion of the midblock arterial road will be addressed by the Town of Whitby within their jurisdiction. As such, the Region can confirm that our previous comments were advisory in nature and were not intended to be conditions associated with the draft approval of the subject subdivision.

### **Conclusion**

The Region is in support of the proposed industrial draft plan of subdivision which will facilitate the use of vacant employment lands for economic growth and promote new employment opportunities.

The Region has provided this update comment to clarify its broader transportation infrastructure requirements and to confirm we are satisfied that the Town of Whitby has adequately planned for the future requirements associated with the deletion of the Future Type 'C' Arterial Road. Moving forward, the Region will continue to provide detailed transportation comments for future submissions related to the proposed amendment to delete the planned east-west midblock Future Type 'C' Arterial Road from the respective official plans.

Also, with respect to the Region's previous comment letter, we had indicated that a revised Functional Servicing Report would need to be provided, and all the Region's servicing Mark-Ups must be addressed. We can confirm that the Region's servicing concerns remain applicable to the proposed subdivision development and can be addressed as part of the review of the related future engineering submissions and through the approval of the Site Plan application.

Based on the foregoing, the Region has no objection to draft approval of the subdivision application. The conditions of draft approval must be complied with prior to clearance by the Region for registration of this plan (refer to Attachment #13).

### **Trans-Northern Pipeline**

No comments.

## **Rogers Communications**

No comments

## **Oshawa Executive Airport**

1. Due to the site's proximity to the airport, a warning clause related to noise must be included in the tenant/ owner documentation and development agreement. City planning has the wording they have developed and used in the past.
2. The proponent shall ensure the new structure and associated refuge does not become a wildlife attractant due to its location in proximity to the airport.
3. Given that a storm water management pond is proposed, the applicant shall retain a wildlife expert to complete a wildlife risk assessment to ensure the risk of wildlife strikes is mitigated due to the proximity of the airport. Furthermore, the wildlife biologist must update the airport's wildlife risk assessment to include the addition of a pond.

## **City of Oshawa (Planning and Engineering Services)**

No comments.

## **Elexicon Energy**

Further to the referenced File # DEV-31-24 (OPA-2024-W/10 SW-2024-04 Z-15-24), subject to the caveats set out in this letter, Elexicon Energy Inc. has no objection to the proposed applications.

The applicant or its authorized representative shall consult with Elexicon Energy Inc. concerning the availability of supply voltage, service location, metering, costs and any other details. These requirements are separate from and in addition to those of the ESA. Elexicon Energy Inc. will confirm the characteristics of the available electrical supply and will designate the location of the supply point to the applicant. Elexicon Energy Inc. will also identify the costs that the applicant will be responsible for.

In some cases, an expansion of Elexicon's distribution system (as such term is defined in the Distribution System Code issued by the Ontario Energy Board) will be required to be able to connect the customer to Elexicon's distribution system. When an expansion is necessary, the Distribution System Code requires that a distributor perform an economic evaluation to determine if the future revenue from the customer(s) will pay for the capital cost and on-going maintenance costs of the expansion project. If a shortfall between the present value of the projected costs and revenues is calculated, the distributor may propose to collect all or a portion of that amount from the customer(s). The evaluation is basically a discounted cash flow calculation that brings all costs and revenues to their net present values. This model, in general, follows the methodology, the set of common elements and related assumptions provided in Appendix B of the

Distribution System Code. Elexicon will provide an Offer to Connect once an official request for electric services is received.

The applicant or its authorized representative shall apply for new or upgraded electric services and temporary power service in writing. The applicant is required to provide Elexicon Energy Inc. with sufficient lead-time in order to ensure:

- a) The timely provision of supply to new and upgraded premises; and/or
- b) The availability of adequate capacity for additional loads to be connected in the existing premises

**Bell**

No comments.