



PLANNING DEPARTMENT

August 9, 2022

Nadia De Santi, MCIP, RPP
Practice Lead, Planning
WSP Canada Inc.
2611 Queensview Drive, Suite 300
Ottawa, ON K2B 8K2

**RE: Status Report
Application for a Draft Plan of Subdivision
Part Lots 26 & 27, Concession 1, Part Lots 25, 26 & 27, Concession 2,
Geographic Township of Bathurst, and Part Lot 1 in Southeast Half Lot
1, Concession 1, Part Lot 1 in Southwest Half Lot 1, Concession 2,
Geographic Township of Drummond, now in the Town of Perth, County
of Lanark
County of Lanark File No. 09-T-22001**

Further to the circulation of the above noted application, the agency and public responses are summarized by topic below and detailed comments are attached.

Provincial Policy Statement (PPS, 2020)

We are unable to confirm conformity to the PPS due to the following issues:

- An Application for Official Plan Amendment is required in order to be consistent with the land use and servicing policies of the PPS.
- The Environmental Impact Study (EIS) is preliminary and incomplete.
- There is missing information related to the Phase 1 Environmental Site Assessment (ESA).
- The Stage 1 & 2 Archaeological Assessments (2010) are insufficient to support the application.
- The Heritage Impact Assessment has determined that the site is significant and, in conformity with the PPS, a designation under the OHA of the remaining 9 holes may be required.

Please refer to comments below and attached for additional supporting information.

Action

Noted studies need to be updated and before conformity can be determined.
Noted studies need to be completed and provided for review.

Official Plan

Minor adjustments to the boundaries between land use designations are only permitted where the general intent of the Plan is maintained. In this case, the proposed inclusion of 5.7 hectares (14 acres) of lands designated “Special Study Area” as a boundary adjustment to the “Residential” designation is not minor in consideration of the extent of lands involved and servicing allocation objectives and policies of the Official Plan. Lands designated “Special Study Area” are located within the urban settlement boundary of the Town’s Official Plan but are not lands designated for development within the planning time horizon of the Plan. An amendment to the Town of Perth Official Plan will therefore be required to redesignate lands from “Special Study Area” to “Residential” prior to considering lands within this area for the purposes of a plan of subdivision. The Official Plan Amendment must be supported by a comprehensive review in accordance with the Provincial Policy Statement.

The proposed “land swap” between residential, environmental protection, open space, and special study area designated lands should more appropriately be implemented as part of the Official Plan Amendment.

The attached comments from the Town of Perth Director of Development Services, include additional comments related to the Town of Perth’s Official Plan.

Action

An Official Plan Amendment will be required to be submitted, with a comprehensive review.

Servicing Capacity

Issue

In conjunction with the above, it is an objective of the sewage and water servicing policies of the Town’s Official Plan to distribute residential treatment capacity in an equitable manner to the various greenfield development areas within the Town in order to avoid the allocation of capacity in a manner that effectively limits or directs development exclusively to one area of the Town for an extended period.

Action

The equitable distribution of sewage and water capacity should be addressed as part of the Comprehensive Review required in support of an Application for Official Plan Amendment for the proposed subdivision. Refer to attached comments from the Town of Perth and the peer review by Jp2g.

Access

In addition to the policies of the Residential designation, the provisions of the New Residential Area Designation also apply to the subject lands (westly of the Tay River). In addition to traffic volumes, the capacity of the Peter Street Bridge needs to be assessed.

Action

A Bridge Capacity Assessment is required to support the scale of development included in the subdivision proposal.

Refer to attached comments from the Town of Perth and the peer review by Jp2g.

Natural Heritage/Environmental Impact Study**Issue**

A Preliminary Environmental Impact Study (EIS) filed in support of the subdivision application is incomplete. Additional information required includes Species at Risk surveys, a Headwater Assessment and an Integrated Hydrologic Impact Assessment.. The enclosed comments from the Rideau Valley Conservation Authority dated July 12, 2022 recommend deferral for approval of the plan of subdivision to allow for consideration and review of these updated technical studies.

Action

Update EIS, complete a Headwater Assessment and complete an Integrated Hydrologic Impact Assessment.

Environmental Site Assessment / Record of Site Condition**Issue**

Only the Phase 1 report was submitted with the application however a Phase 2 and a Record of Site Condition (RSC) is mentioned in the application form and in the study as having been completed.

Action

Applicant to provide Phase 2 ESA and RSC.

Affordable Housing

Issue

The size of the project triggers the Official Plan, (SCOP and Town of Perth) requirement for including affordable housing and the preparation of an affordable housing market evaluation.

Action

Applicant required to assess affordable housing market and provide integration of affordable housing into the development in line with the Official Plan.

Archaeology

Issue

The study is dated 2010, which is prior to the current 2011 Standards and Guidelines, of the Ministry of Tourism, Culture and Sport (MTCS) and is therefore insufficient and not acceptable by the MTCS. Based on our consultations with the MTCS, it is understood that they can not support the findings of the 2010 stage 1-2 and it is likely that a new stage 2 will need to be prepared, as well as a stage 3 and possibly stage 4 for at least parts of the property.

Therefore, the Archaeological Assessment needs to be either new or updated to comply with current Ministry Standards.

Action

Applicant to undertake a new Archaeological Assessment accordance with current MTCS Standards and Guidelines . MTCS has also indicated that a new approach to the archaeological assessment will be required.

Heritage Impact Assessment

Issue

A peer review of the HIA has been requested by the Town of Perth.

Action

Town of Perth will retain a peer reviewer to review the HIA.

Hydrogeological Study

Issue

Further assessment needs to be done and integration into the Storm Water Management (SWM) and Environmental Impact (EIS) Studies.

Action

Applicant to update the integrated Hydrogeology Study based on identified insufficiencies. Consultation with the RVCA and the Town of Perth is recommended.

Source Water Protection**Issue**

Further information needs to be provided on how Source water is to be protected; could be implemented at detailed design phase; specifically, regarding snow storage.

Action

Source water protection should be addressed in the EIS and reviewed by the RVCA.

Active Transportation Systems

It is unclear on how pedestrians and cyclists will be crossing the Peter Street bridge. The Transportation Review made some suggestions but no recommendations.

Action

Clarification on issues from applicant's engineer required.

Refer to attached comments from the Town of Perth and the peer review by Jp2g.

Servicing**Issue**

In reference to the - Preliminary Functional Servicing Report – DSEL

- Water Line Capacity for Fire flow – may not be sufficient for first phase.
- Identification of trigger point (unit count) for predicted upgrade to SAGR for capacity.
- No identified flood protection for pumping station indicated.
- Missing discussion on utility servicing
- Assess feasibility of stand-alone wastewater treatment system such as Newterra.
- Stormwater pond outfall not indicated

Inconsistencies and missing information in the Preliminary Servicing Report.

Action

Update Servicing Report to address identified issues or areas of clarification is required.

Refer to attached comments from the Town of Perth and the peer review by Jp2g.

Draft Plan

Comments

- The boundary is not clearly indicated on the draft plan;
- The key plan does not clearly indicate the information of Section 17 (c) of the Planning Act;
- Section 17 (d) – the plan generally depicts the lots but does not clearly depict the uses for each block;
- Section 17 (e) - the plan includes a gray shaded area which is not indicated as to what this is. The uses of adjoining lands are not clearly indicated;
- The scale of the plan is not appropriate.
- The plan should be legible at a reduced size.
- Phasing has not been indicated on the plan.
- There are lines on the plan which are incomplete, i.e. road allowance.
- The underlying layers are unclear and not referenced.
- The table includes both metric and imperial measurements, all measurements should be metric.
- The plan has not been signed by the owner or an Ontario Land Surveyor

Inconsistencies between Draft Plan, application and studies (draft plan only suggested 350 detached homes whereas all other documentation refers to a mix of singles and towns)

Application Form

Section 2.2 Are there any easements or restrictive covenants affecting the subject land?

If yes, describe the easement or covenant and its effect.

Please provide an explanation of the effect of the noted easement.

Table 3.1

- Indicates 350 detached on Blocks 1-18
 - Singles are generally on lots not blocks. Please indicate what lots are proposed for single detached.
- Please indicate what blocks are proposed for other types of residential. The planning rationale indicates single-detached and townhouse dwelling units.
- The total for number of dwellings is noted as 172. Please provide an accurate total number of dwellings.
- Also note that there is not a consistent number of dwelling units for Phase 1 in the reports.
- Please clearly indicate the number of blocks for park / open space, roads, and other.

Section 3.10

Indicates that a Phase One ESA, Phase Two ESA and RSC have been prepared, and that the site may have been contaminated by golf course maintenance (herbicides / pesticides).

These reports have not been included with the submission. Please provide.

Section 4.2 and Section 4.3. The County of Lanark and the Town of Perth did not confirm the requirements of the applicable Official Plans have been met. **The application notes, that If an official plan amendment is needed, it should be submitted prior to or concurrently with this application.**

Section 5.3

The application indicates yes, however the accurate response is no as no application for a zoning by-law amendment has been submitted to the Town of Perth.

Table B – Significant Features Checklist

Column – Potential Information Needs – have these been addressed ?

Example, Floodplains – paragraph 3 “where a Special Policy Area (SPA) is in effect, development must conform with official plan policies for the SPA.

General Comments

There are inconsistencies amongst the reports, and in the application form, in regards to the number of units proposed.

There are inconsistency amongst the reports, and in the application form, in regard to the lot area of the subject lands.

Public Comments

See attached.

Please review the comments above and attached, should you have any questions or concerns, please do not hesitate to contact the undersigned.

A meeting with the agencies and your team can be coordinated by the undersigned to review the comments in further detail.

Sincerely,

A handwritten signature in black ink that reads "Julie Stewart". The signature is written in a cursive, flowing style.

Julie Stewart, MCIP, RPP
County Planner

cc: Hugo Lalonde, Caivan (Perth GC) Limited
Town of Perth
Rideau Valley Conservation Authority

ATTACHMENTS

- Town of Perth submission
- E-mail from RVCA
- E-mail from UCDSB
- Hydro One – e-mail
- Bell Canada - e-mail
- Enbridge comments
- Public comments