



March 21, 2024

Koren Lam, Senior Planner
Lanark County
99 Christie Lake Road
Perth, ON
K7H 3C6

Dear Ms. Lam:

**Re: Carleton Lifestyles (347 Franktown Road, Town of Carleton Place)
Draft Plan of Subdivision Comment Response
Lanark County File No.: 09-T-22002**

This letter addresses the Town of Carleton Place comments received on January 22, 2024 in response to the Draft Plan of Subdivision application (April 22, 2022) for the proposed development at 347 Franktown Road. We are pleased to provide the following updated plans and reports in support of our responses to the comments received:

- Draft Plan of Subdivision, prepared by Annis, O'Sullivan, Vollebakk;
- Planning Rationale (March 20, 2024), prepared by Egis;
- Site Plan (February 27, 2024), prepared by Peter Mansfield Architect;
- Servicing and Stormwater Management Report (March 21, 2024), prepared by Egis;
 - Site Grading Plan (March 21, 2024), prepared by Egis;
 - Site Servicing Plan (March 21, 2024), prepared by Egis;
- ESA Phase 1 (dated July 7, 2021), prepared by Geofirma Engineering.
- Traffic Memorandum (February 15, 2024), prepared by BT Engineering.

Note that the Draft Plan of Subdivision has been amended to remove access dependency on the neighbour to the north. Specifically, and as shown on the updated Draft Plan of Subdivision and Site Plan, the proposed temporary turning circle has been incorporated into the subject lands. Once the road is extended, the townhomes within Phase 4 of the development should be able to be developed as proposed.

Note as well that Section 2 of this letter provides a high-level response concerning the stormwater-related comments received from the Mississippi Valley Conservation Authority (MVCA) dated July 19, 2022. In short, it appears as though those comments apply to the Development Permit application submitted for Phase 1 of the Carleton Lifestyles development and not the overall Draft Plan of Subdivision.

The following paragraphs comprise our response to the comments received.

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1.0 TOWN OF CARLETON PLACE

1.0 Planning Rationale

MP General Comment: The Planning Rationale was initially submitted in April of 2022. Although Town Staff had communicated their opinion that the application was premature, this opinion was rooted in availability of servicing connections. Respectfully, it is concerning that comments identifying deficiencies with the document are being provided at this juncture. While it is our overall assertion that the review and consideration of servicing and access aspects of the development can and should have been proceeding, it is critical that other aspects of the development application should also be advanced wherever possible. This being said, in an effort to move approvals forward in a constructive manner, comments provided have been addressed as appropriate.

- The Planning Rationale needs to be amended to evaluate the applications compliance with the requirements of Section 51(24) of the Planning Act.

MP Response: Section 4.1, entitled Draft Plan of Subdivision Criteria, has been added to the Planning Rationale.

- Please identify in the planning rational what makes this development a “retirement village” and “seniors apartment” and what impact those uses have on considering the application compared to a conventional residential development.

MP Response: The proposed development entails an aging-in-place concept for seniors with a range of ancillary health care services and daily living services. It should be noted that terms such as “senior’s apartment building” as described in the Planning Rationale are intended to assist Staff in understanding the land use being proposed and are not intended to be technical terms. Additionally, the appropriateness of the land use has been thoroughly considered as part of the Development Permit Amendment (DPA) application and, as provided in the Staff Report for the DPA, the uses are “fundamentally closer related to the standards and permitted uses described in the ‘Institutional’ land use designation.” The proposed use of a seniors’ apartment building as part of a campus style mixed use community has been considered by way of DPA approvals. The Report further acknowledges that the DPA application “would allow for the consideration of the appropriateness of the use on the site without being subject to the same level of detailed review that will come through the future Development Permit application.”

Section 1.3 of the Official Plan provides for a “broad range of uses and a balanced mix of appropriate residential densities” and Section 3.5 provides that a “broad range of housing types and compatible services and amenities” are permitted in the Residential District. Additionally, an objective of Section 3.5.1 is to promote sustainable, efficient and diverse residential neighbourhoods and to provide a diverse range of housing types and densities. Accordingly, the proposed development contributes to the diversity of

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residential development in Carleton Place and conforms with the goals and objectives of the Town as expressed by way of its Official Plan policies.

Respectfully, it is our position that the above is adequately addressed within the Planning Rationale and that no associated changes are warranted.

- Please amend the Rationale to indicate how the developer proposes to address the provision of parkland in accordance with Section 51.1 of the Planning Act.

MP Response: A new statement has been added to the bottom of Section 3.1. of the Planning Rationale. The paragraph communicates that it is assumed at this juncture that parkland dedication requirements will be addressed by way of cash-in-lieu of parkland, as requirements for parkland were not identified during Pre-Consultation.

- Please amend the Rationale to indicate how the proposal satisfies Policy 3.5.5 of the Town's Official Plan.

MP Response: A row has been added to the table within Section 4.4 that speaks to the satisfaction of Policy 3.5.5. It is acknowledged that the overall site exceeds the density ranges permitted for conventional residential development. However, as noted in the Planning Rationale, the retirement home component of the proposed development is not subject to the residential density classifications as provided in Section 3.5.4.4 of the Official Plan. Accordingly, it is expected that the overages in density will be considered as acceptable by the Town given that the development is providing housing specifically for seniors in Carleton Place. The retirement home and seniors' apartment building include proposed amenities and complimentary uses not typically seen in residential development, including games and activity areas, lounge areas, hobby room, library, and an exercise room.

- Section 4.4 of the Planning Rationale should be amended to reflect the DPA-02-2021 approval.

MP Response: Section 4.5 has been amended accordingly.

- How does the development contribute to the creation of affordable housing? Author is encouraged to review County of Lanark's Municipal Tools to Support Affordable Housing Report for local demographic and market statistics.

MP Response: As provided in the Lanark County Municipal Tools to Support Affordable Housing Report, "there is a need for a more diverse housing supply in Lanark County, including housing options for the aging population, and smaller households." The campus-style senior's residence adds to the diverse housing supply in the County and provides housing options for seniors. The range of amenities and adjacent medical services support the "Aging in Place" concept as discussed in the Report. It is worthwhile noting that two affordable housing units, as defined by the PPS, will be incorporated into the proposed development.

- The Planning Rationale indicates that it is provided in support of both the Subdivision and Class 2 permit application. In order to support the Class 2 permit, the following additional amendments are required:

- An analysis of the conformity and compatibility of the proposed commercial uses and “seniors apartment” (“residential”) uses is required. Why is it appropriate for these uses to be mixed within the site? Are there any impacts which need to be mitigated or managed?

MP Response: The Planning Rationale discusses Official Plan policy 3.5.3 with respect to the compatibility of residential and ancillary commercial (medical) and health facilities. As noted, site design prioritizes the integration of resident and visitor parking, landscaping, and other facilities, and relies upon these elements in order to help buffer/transition to adjacent lands. As provided in the amending By-law, *Medical Clinic, Seniors’ Residential Apartment Dwelling, Local Commercial Uses*, and *Townhomes* are permitted on the subject land. As noted in the Planning Rationale, and following the final approval of the amending By-law, *Medical Clinic, Seniors’ Residential Apartment Dwelling, Local Commercial Uses*, and *Townhomes* are permitted uses on the subject lands.

- How is the proposal enhancing the Franktown Thoroughfare District in accordance with the Official Plan Community Design Policies?

MP Response: Please refer to Section 5.1.2 within the Urban Design Brief provided as part of the Planning Rationale for the Development Permit Amendment.

- How does the proposal conform to Official Plan Policy 6.7.3?

MP Response: A row in Table 3 has been added. However, the criteria in Section 6.7.3 will be addressed by way of the review and approval of technical studies largely at the Development Permit stage. Studies and Plans such as a Traffic Study, Site Plan, Landscape Plan, and civil engineering plans and reports will continue to be required and will be subject to review and comment response. Similarly, plans and reporting have been submitted as part of the draft plan of subdivision application in fulfillment of Section 6.7.1 of the OP.

- An Urban Design Brief is required to support the development application.

MP Response: An Urban Design Brief was submitted and reviewed as part of the Planning Rationale dated August 16, 2021 under the Development Permit By-law Amendment application submission.

1.1 Tree Preservation Report

- An enhanced planting program with native species such as Oak, Maple, Black Walnut would be a benefit to the area over time and should be considered in the landscape plans for the site.

MP Response: Acknowledged.

1.2 Traffic Impact Study

- The Town would appreciate receiving comments from the Ministry of Transportation on the study as it pertains to vehicular movement on Franktown Road and the intersection of Highway 7 and Highway 15.

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MP Response: The MTO was included in the April 22, 2022, submission of the Draft Plan of Subdivision Application.

- The Town offers no comments on the submission at this time but reserves the right to provide future comments pending the review of Subdivision File 09-T-23001 and the comments provided by MTO.

MP Response: We encourage the Town to provide any comments on the traffic study at the earliest possible juncture as we are interested in moving forward with Draft Plan of Subdivision approvals as soon as possible. Respectfully, if no comments are provided we will assume that there are no concerns.

1.3 Servicing and Stormwater Management Report

- The Town is not prepared to provide final comments on the application until the servicing proposal for the Coleman Central Subdivision has been approved by the Town as the impact of the scope and size of services may result in the need for upsizing of pipes downstream thereby impacting the feasibility of this application.

MP Response: It is our understanding further to our March 5 meeting that Town Staff should now be in a position to provide final/full commentary in order to facilitate advancement of approvals to Draft Plan of Subdivision.

- It is noted that the development lands are subject to Cost Sharing Bylaw 61-2022 for the provision of “Core Services”. Cost sharing contributions are estimated to be \$219,530.19 (adjusted for inflation).

MP Response: Acknowledged.

Servicing

- A predevelopment drainage plan is required to assess the northern lands.

MP Response: A predevelopment drainage plan is included in the updated Stormwater Management Report.

- Recent modifications to Coleman Central Phase 2 necessitate updates to the sanitary sewer details after the completion of downstream modeling.

MP Response: Noted.

- Discrepancies exist between the indicated 24 townhome units on the sanitary sewer design sheet and the current depiction of 18 units on the site plan.

MP Response: Please note that the sanitary sewer design sheet includes flows from both the 18 proposed townhomes from 347 Franktown Road and the 6 proposed townhomes from the 355 Franktown Road application. The calculation sheets have been reviewed and revisions have been made as necessary.

- The removal of the memorandum concerning servicing upgrades is necessary.

MP Response: Noted.

- Extension of the sidewalk along Franktown Road to the new entrance is recommended, equipped with catch basins and a connection to the ditch outlet.

MP Response: Sidewalks in the civil plans are representative of the February 27th, 2024, Site Plan. The existing sidewalk within Franktown Road culminates at the northern limit of the driveway serving the residential dwelling at 347 Franktown. The Plans include a new concrete sidewalk extending from the southern limit of that driveway to the subject lands and along their frontage at Franktown Road.

- The storm sewer's design between manhole 102 to 103 and from 109 to 102 is set at 98% capacity for the 5-year rain event. To accommodate potential use by the northern lands, consider increasing the sewer slope or resizing the pipe to a maximum of 85% capacity for the same event.

MP Response: In coordination with the Coleman subdivision, the lands to the north are proposed to be connected directly into the subdivision sewer system. Upsizing the sewers as a result of the northern lands is not anticipated to be necessary. However, there is some capacity in the storm sewer system to accommodate additional flows if required.

- The sanitary drainage plans need to accurately assess on-site uses and proposed flows.

MP Response: A sanitary drainage plan has been prepared and is included in the updated Servicing and Stormwater Management Report.

- Servicing for the site is contingent on adjacent development completing sewer and water construction up to the property line, as current services are unavailable. Approval will not be granted until the necessary infrastructure is available for connection.

MP Response: Noted.

- Prior to the development's progression, the Town must undertake a sewer upsizing project due to a downstream sewer capacity limitation within the Town's collection system.

MP Response: Noted. It is understood that the sewer upsizing project has been scheduled to support the developments.

Watermain

- As outlined in Section 3.1.1, Franktown Road, within the Servicing and Stormwater Management Report, it is noted that the current watermain culminating in a stub is initially documented as a 300mm diameter. However, Public Works has verified that it is a 200mm pipe leading to the stub. There is a belief that between Findlay and the stub, there might be a 300mm-200mm reducer owing to the necessity for multiple turns to shut down the valve.

MP Response: The watermain within Franktown Road has been revised to a 200mm.

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Roadways, Parking Lots and Sidewalks

- Is the fire access lane going to be a through road to Franktown Road for the public to use?

MP Response: Please refer to the February 15, 2024 Alternative Emergency Access Memorandum prepared by BTE Engineering, asserting that the primary access to the proposed development at Franktown Road can be designed to serve as both a restricted access (right-in) for regular traffic and both a left-in and right-in access for emergency vehicles. Provided the rationale provided by BTE Engineering is accepted, the proposed access over 355 Franktown will be a temporary access for regular vehicular traffic serving Phase 1 of the proposed development until such time as the public right of way within the site is dedicated as public.

- A turning circle is required for the dead-end road between the townhomes and the senior's apartment building.

MP Response: A turning circle has been incorporated within the limits of the subject lands and is reflected on the revised Draft Plan of Subdivision and Site Plan.

- Civil drawings show parking along the fire access route from Franktown Road, but the site plan does not include this.

MP Response: The updated Civil drawings and Site Plan both show parking in this location.

- Civil drawings do not include a sidewalk connection to Franktown Road, but site plan does.

MP Response: The updated Civil drawings and Site Plan both include a sidewalk connection.

- As easement will need to be acquired from the northern property owner to facilitate a minimum 12m radii turning circle for our winter maintenance vehicles and emergency services.

MP Response: Comment noted; however, the Draft Plan of Subdivision has been amended to remove access dependency on the neighbour to the north.

- Remove sidewalk on the east side of municipal right of way.

MP Response: The sidewalk is located on the west side of the proposed public right of way.

- The following reports and studies have been reviewed and no comments or requests for clarification are required:

- Environmental Impact Statement

MP Response: Acknowledged.

- The documents submitted also reference the completion of a Phase 1 Environmental Site Assessment. Please provide a copy of this report for our records.

MP Response: A Phase 1 Environmental Site Assessment, prepared by Geofirma Engineering and dated July 07, 2021, has been included with this submission for the Town's records.

2.0 MISSISSIPPI VALLEY CONSERVATION AUTHORITY (MVCA)

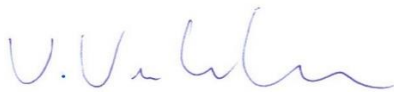
The MVCA provided an overall August 12, 2022 letter to Lanark County in relation to the Draft Plan of Subdivision application which identifies a July 19, 2022 Stormwater Review Letter as an attachment. Upon further review, the Stormwater Review Letter appears to apply to the Servicing and Stormwater Management Report (dated June 22, 2022) submitted as part of the *Development Permit* application; the Letter does not address the original March 25, 2022 Servicing and Stormwater Management Report submitted on April 22, 2022 as part of the *Draft Plan of Subdivision* application. Accordingly, and in order to avoid providing a response to comments related to the Development Permit application as part of a Draft Plan of Subdivision resubmission, we believe that the next logical step would be for the MVCA to complete a review of the enclosed updated Servicing and Stormwater Management Report applicable to the Draft Plan of Subdivision application.

While we expect Development Permit approvals to resume/proceed in the near future, our priority at this juncture is the advancement of the Draft Plan of Subdivision application.

3.0 OTHER COMMENTS RECEIVED

As noted within Lanark County's December 15, 2023 Status Letter, other comments have also been received since our April 2022 application. These include earlier comments from the Town of Carleton Place that are no longer applicable concerning the premature nature of the application, as well as agency comments that are either standard in nature or that do not express concern (Enbridge - June 9, 2022; Bell - June 1, 2022; and Hydro One - June 13, 2022). We also acknowledge the public comment from Mr. Colin MacDuff (dated June 29, 2022) and we trust that the technical information presented by way of the Traffic Study should serve to address traffic-related concerns.

Respectfully Submitted,



Vithulan Vivekanandan, MES Pl.
Planner