



February 22, 2023

Perthmore Enterprises Inc.
c/o Maurice Decaria
80 Dufferin Street
P.O. Box 20054
Perth, ON
K7H 3M6

**Re: STATUS REPORT – Perthmore Subdivision – Phase 6
Part Southwest Half and Part Northeast Half Lot 3, Concession 2,
Geographic Township of Drummond, being Part 1 on 27R-7125 and
Part 1 on 27R-8420 except PL88, 27M-3, 27M-14, 27M-16, 27M-21,
27M-55 and Parts 3, 4 on 27R-7540, now in the Town of Perth, County
of Lanark
County of Lanark File No. 09-T-21001**

BACKGROUND from 2021 (applicable to the landholding)

Lanark County received an application for draft plan of subdivision in the Town of Perth on February 26, 2021. This application represents Phase 6 of the Perthmore subdivision development. Based on a review of the materials included in the application and supporting documents, the application was deemed complete by the County on March 10, 2021.

DESCRIPTION

The subject property is designated as Settlement Area in the Sustainable Communities Official Plan of Lanark County, and Residential and Environmental Protection in the Official Plan of the Town of Perth. The subject lands are currently zoned as Residential First Density (R1) and Environmental Protection (EP) within the Town of Perth Zoning By-law No. 3358. The application indicates that a concurrent Zoning By-law Amendment application has been submitted to the Town of Perth. The proposed draft plan includes 42 lots for single detached dwellings, 23 lots for semi-detached dwellings, for a total of 65 proposed residential lots. The draft plan also includes four (4) blocks for future medium and high density development and two (2) blocks for stormwater

management purposes.

The proposed lots will have frontages on newly created internal streets and on extensions of the existing Perthmore Street and Senators Gate Drive. A future arterial road is proposed on the landholding which is located to the east of the proposed subdivision lots to provide future access from Perthmore Street to Provincial Highway No. 7.

The subject lands are bounded to the east by the proposed Arterial Road and the Perth Long Swamp Provincially Significant Wetland and the existing Perthmore neighbourhood to the south and the west. The remnant lands and Provincial Highway No. 7 are to the north.

Review and Background of the 2021 Submission

Lanark County received an application for draft plan of subdivision in the Town of Perth on February 26, 2021. This application represents Phase 6 of the Perthmore subdivision development. Based on a review of the materials included in the application and supporting documents, the application was deemed complete by the County on March 10, 2021.

The application submitted in 2021 proposed

- 42 lots for single detached dwelling.
- 23 lots for semi-detached dwellings.
- for a total of 65 proposed residential lots.
- The draft plan also includes four (4) blocks for future medium and high density development and two (2) blocks for stormwater management purposes.
- proposed lots will have frontages on newly created internal streets and on extensions of the existing Perthmore Street and Senators Gate Drive.
- A future arterial road is proposed on the landholding which is located to the east of the proposed subdivision lots to provide future access from Perthmore Street to Provincial Highway No. 7.

Summary of timeline of 2021 application:

- A Notice of Application and Consultation was circulated to the required agencies and to members of the public on March 19, 2021.
- The Town of Perth subsequently held a public meeting for the associated zoning by-law amendment. At the May 11, 2021, Town of Perth Committee of Whole meeting the matter was discussed and the Committee of Whole voted to defer.
- Correspondence from the Town of Perth's Director of Development Services, dated June 8, 2021, states that "the Town does not support the plan of subdivision application at this time. Additional studies are required to support the application.
- Rideau Valley Conservation Authority (RVCA) provided detailed comments dated April 15, 2021. RVCA has indicated that the application "is not

- consistent with the Provincial Policy Statement, the Town's Official Plan or the original recommendations of the EA process for the arterial road" and as a result, the RVCA can not support the proposed subdivision application or the requested zoning by-law amendment at this time.
- Ministry of Environment Conservation and Parks also provided comments to on June 3, 2021. MECP has identified a number of occurrences of Species At Risk in the area. MECP noted that there was no supporting information for how specific speiace at risk and their habitat were evaluated on site or how it was determined there would be no impacts to species at risk or their habitat. More information will be required

 - As a result of the documentation received to date from the agency and public comments, there are various issues to be resolved before the County will further consider the Application.

Status Report provided June 25, 2021 – attached.

Review and Background of the 2022 Submission

The County of Lanark received a revised submission of a Draft Plan of Subdivision for Perthmore Phase 6, in September 2022.

The following provides a summary of the proposed revised application as included within the Planning Rationale Report, dated August 5, 2022:

- The subdivision area is 5.6 hectares, which is a portion of the 29.7 hectare land holding.
- Thirty-five (35) lots are proposed to be developed with single detached dwelling units.
- Eighteen (18) lots are proposed to be developed with semi-detached dwelling units, for a total of thirty-six (36) dwelling units.
- Four (4) of the semi-detached dwelling units are proposed to contain apartment units, for a total of eight (8) dwelling units.
- Block 54 is proposed to contain a medium density apartment building of three and a half storeys, containing 14 units.
- Total of ninety-three (93) dwelling units in total.
- One new internal street is proposed.
- Extensions to Perthmore Street and Senators Gate Drive are proposed.
- Block 55 is a proposed storm water management facility.
- Block 58 is proposed as parkland.

The County of Lanark requested the applicant to provide a revised plan of subdivision application form due to the substantial difference between the two proposals.

Agency comments received to date by the County of Lanark:

- Hydro One – September 22, 2022
- Enbridge – September 26, 2022
- MTO – September 28, 2022
- E-mail from Grant Machan – October 7, 2022 -high level concerns.
- Letter from Town of Perth, Director of Development Services, Joanna Bowes, received via e-mail January 9, 2023
- RVCA – comments are to be provided. These comments will be circulated.

Town of Perth (summary):

- Comprehensive Development Plan – developer and agents were advised that a comprehensive conceptual plan was required for any future submission. Comprehensive Plan to include proposed development, phases, parkland, density, servicing, access, etc.
- Tertiary Entrance / Arterial Road – tertiary entrance is required.
- Stormwater - may be amendments required.
- Environmental Impact Statement – further revision is required.

The Town of Perth notes in their letter that it is the opinion of the planner and the engineer that the submission is not ready for continued review.

In 2021, comments from MECP were received and noted in the Status Report of June 2021. At this time, no comments have been received from the MECP related to the re-submission.

Summary

Based on the comments from the Town of Perth, the Town is requesting that a Comprehensive Development Plan to indicate current and future proposed development, how the development is proposed to be phased, location of parkland, provision of density calculations, tertiary access – where is this to be provided, servicing plans. Similar concerns were expressed by the Town in 2021.

The Environmental Impact Statement does not appear to be consistent with the revised draft plan. The EIS includes blocks and lots are proposed within significant wildlife habits, and should be amended.

The Town is also requesting that the comprehensive plan provide further details on the existing and proposed stormwater management.

Comments have been received from the members of the public and the Perthmore Community Association, these are attached to this letter.

It is recommended that the owner / agent proceed with addressing the issues / questions raised by the members of the public as well. Please include the County on all correspondence.

From: [LANDUSEPLANNING](#)
To: [Julie Stewart](#)
Subject: Lanark - Perthmore Sub - Phase 6 - RE-SUBMISSION - 09-T-21001
Date: September 22, 2022 9:36:04 AM
Attachments: [image001.png](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

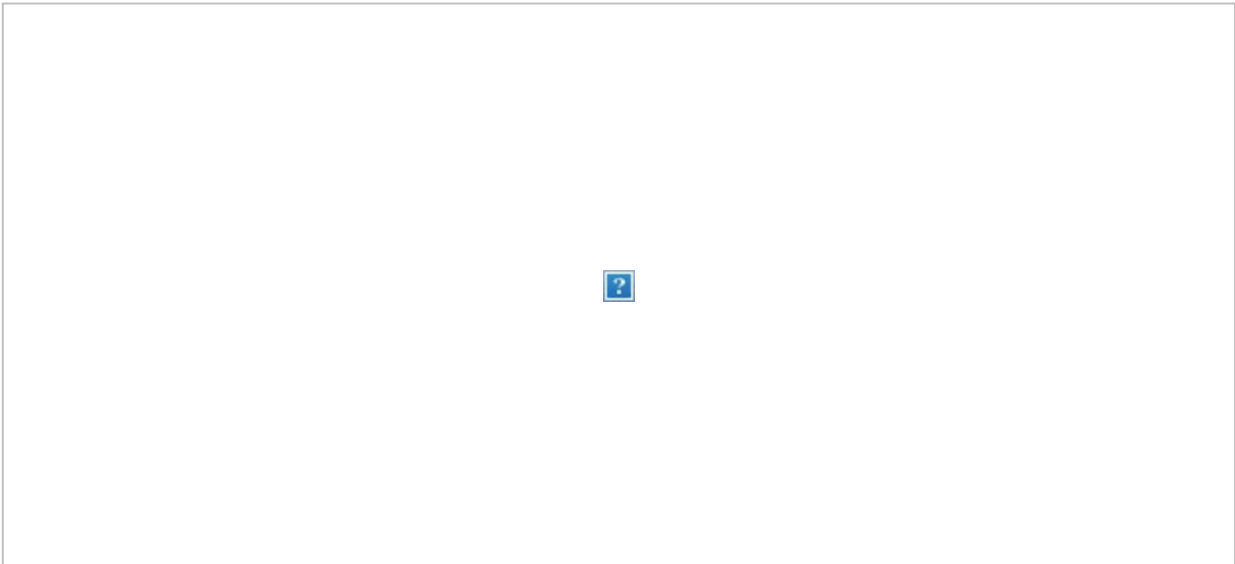
Hello,

We are in receipt of your Draft Plan of Subdivision Application, 09-T-21001 dated September 12, 2022. We have reviewed the documents concerning the noted Plan and have no comments or concerns at this time. Our preliminary review considers issues affecting Hydro One's 'High Voltage Facilities and Corridor Lands' only.

For proposals affecting 'Low Voltage Distribution Facilities' please consult your local area Distribution Supplier. To confirm if Hydro One is your local distributor please follow the following link:

[Stormcentre \(hydroone.com\)](https://stormcentre.hydroone.com)

Please select " Search" and locate address in question by entering the address or by zooming in and out of the map



If Hydro One is your local area Distribution Supplier, please contact Customer Service at 1-888-664-9376 or e-mail CustomerCommunications@HydroOne.com to be connected to your Local Operations Centre

Thank you,

Kitty Luk

Records Administrator | Land Use Planning

Hydro One Networks Inc.

185 Clegg Road

Markham, ON | L6G 1B7

Email: landuseplanning@hydroone.com

From: Julie Stewart <jstewart@lanarkcounty.ca>

Sent: Monday, September 12, 2022 4:07 PM



Enbridge Gas Inc.
500 Consumers Road
North York, Ontario M2J 1P8
Canada

September 26, 2022

Julie Stewart, MCIP, RPP
County Planner
County of Lanark
99 Christie Lake Road
Perth, ON K7H 3C2

Dear Julie,

Re: Draft Plan of Subdivision - Resubmission
Perthmore Enterprises Inc.
Perthmore Subdivision - Phase 6
Part Southwest Half and Part Northeast Half Lot 3, Concession 2
County of Lanark
File No.: 09-T-21001

Enbridge Gas Inc. has no changes to the previously identified conditions for this revised application(s).

Sincerely,

A handwritten signature in blue ink that reads 'Casey O'Neil'.

Casey O'Neil
Sr Analyst Municipal Planning
Engineering

ENBRIDGE
TEL: 416-495-5180
500 Consumers Rd, North York, ON M2J1P8
enbridge.com
Safety. Integrity. Respect. Inclusion.

From: [Grant Machan](#)
To: [Julie Stewart](#); [Joanna Bowes](#)
Subject: Perthmore Developments- Phase 6
Date: October 7, 2022 3:07:50 PM

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I have been reviewing the Phase 6 submission from McIntosh Perry for the Perthmore subdivision and have the following high-level concerns:

1. Comprehensive Development Plan:

As the Perthmore Development has matured into a nearly a 40-year development, staff have approved development in a piecemeal format to support advancement of the subdivision. As the subdivision nears a completion horizon, a number of considerations have surfaced and caused staff and approval agencies challenges since the larger picture remained unresolved (stormwater, pedestrian movements, street logistics, etc).

I submit that an overall plan of the remaining developable area was requested and required for future approvals. The current submission is limited to Phase 6 and lacks the overall conceptual plan of the remaining area. Perth staff met with the developer and two (2) engineering/planning representatives working on the Perthmore subdivision and relayed at that meeting that a comprehensive conceptual plan was required for any future submission.

Perth Council has been firm with seeking a comprehensive plan from developers to gauge the overall logistical considerations involved in all development.

2. Tertiary Entrance/Arterial Road

In the discussion with the developer referenced above , it was also conveyed that an additional entrance is required prior to any additional development. Though the developer continues to overlook this requirement, previous Perth approval staff have identified the requirement for the tertiary entrance for several years leading to this next phase. The traffic loading, especially from construction traffic has put an undue strain on the residential streets and has also increased the community concern about trucks, noise, and debris on the roadway.

3. Stormwater review documents:

The information in the package references a catchment that is not in the Perth area. I have asked Jason Sharp from MCIP to review the information, and a resubmission may be required.

I request that Items 1 and 2 get rectified prior to advancing with a comprehensive review of the current submission. There are a number of interconnections (traffic evaluation, catchment areas, future capacity) that need to be addressed with a fulsome submission package for the remaining development lands.

Julie:

As requested please note below a brief comment on the submission for Perthmore 6C.

With respect to the Environmental Impact Statement updated August 5, 2022, further revision is required. It continues to make mention of the future development of the arterial road in several locations and comes to conclusions about habitat significant based on this road. The intention of re-submission was to explore and assess what impacts, if any would occur when the arterial road is removed and to consider impacts when a tertiary entrance is added.

The Town of Perth respectfully submits that the location of parkland being located in a preservation area for wildlife/woodlands habitat is inappropriate. Additionally, we would like to see a more comprehensive plan to see other submissions for density, parkland, servicing etc.

The EIS notes that a re-assessment is required for areas 50 m around butternut species. We have not seen the re-assessment. Has it been submitted?

Additionally, the map of phase 6C in the EIS is different from the draft plan submitted. Please revise.

With respect to the Planning Rationale, no discussion of the tertiary entrance has been provided. The Town is not currently in a position to circulate the zoning submission as it does not reflect the current changes to the revised draft plan submission. The changes to the EIS have not been reflected or discussed in the planning rationale report. The report further notes Block 58 as parkland, but also indicates preservation of habitat. Rezoning stormwater block 55 from EP to R3? Why does storm pond need and R3 zone. Please revise and explain in more detail.

The draft plan still indicates the arterial road. As the developer is aware the Town of Perth has removed this from its strategic plan and all related by-laws. As such the draft plan should be revised to indicate this. Additionally, the draft plan is required to indicate a tertiary entrance as discussed at length during preconsultation meetings with the developer and both of their consultants recently and in many past renditions of various phases. The tertiary entrance is a requirement for this phase particularly in consideration of access to provincial highway. Traffic loading especially from construction traffic has put an undue strain on residential streets and has caused public concern about trucks, noise and debris on the roadways.

Block 55 and 56 and lots 29-48 are directly in significant wildlife habitat. Until the EIS is revised appropriately, these blocks should not be included in this draft plan.

It appears as though the developer is intending to move the existing stormpond to Block 55. What is the plan for the existing stormpond lands, they do not have road access. The Town has no interest in rezoning from EP to 3 without an understanding of what is to occur. Again, a more fulsome overall plan needs to be provided.

It is noted by Environmental Services that in review of the Stormwater documents that the package references a catchment that is not in the Perth area. A re-submission may be required.



**THE CORPORATION OF
THE TOWN OF PERTH**
80 Gore Street East
Perth, Ontario K7H 1H9
Phone: (613) 267-3311
Fax: (613) 267-5635

A comprehensive concept plan of full build out is required to help better understand stormwater, pedestrian movements, street logistics, parkland etc.

No major review of these items or others has been completed against the Official Plan or Zoning By-law as it is the opinion of the planner and the engineer that the submission is not ready for continued review or additional circulation without the above information being provided. Updates to drawings and studies are required. This is not a formal and complete comment on this application.

A handwritten signature in cursive script that reads "Joanna Bowes".

Joanna Bowes, MCIP RPP
Director of Development Services
Town of Perth

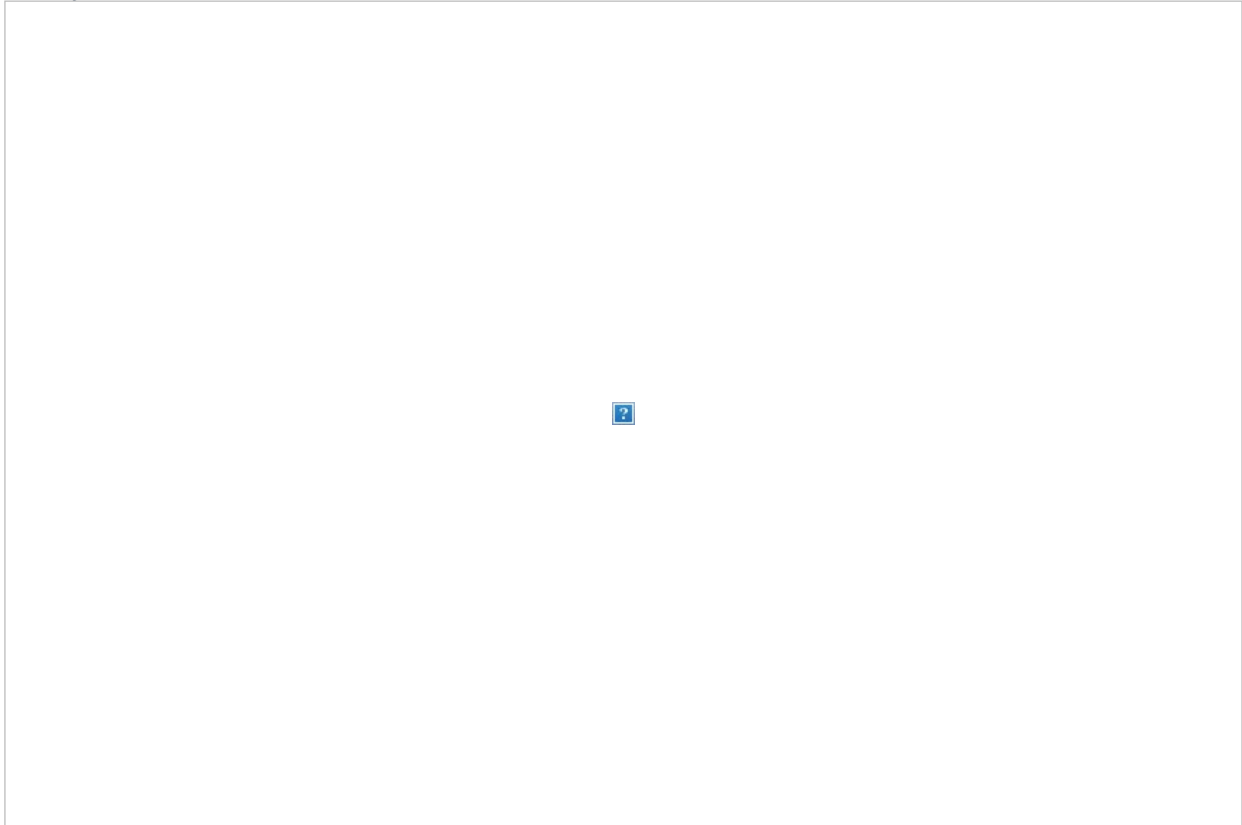
From: [Nadeau, Alain \(MTO\)](#)
To: [Julie Stewart](#)
Cc: [Kapusta, Stephen \(MTO\)](#)
Subject: FW: 09-T-21001 Perthmore Subdivision - Phase 6 - RE-SUBMISSION
Date: September 28, 2022 9:13:08 AM
Attachments: [image001.png](#)
[image002.png](#)
[09-T-21001 Letter Re-submission September 12, 2022.pdf](#)
[Status Report - Perthmore Subdivision - Phase 6 - 09-T-21001 June 2021 Final.pdf](#)
[00 - Perthmore - Comment-Response Letter \(Aug 5.22\) \(1\).pdf](#)
[01 - Perthmore - Draft Plan of Subdivision \(Aug 5.22\).pdf](#)
[02 - Perthmore - Planning Rationale \(Aug 5.22\).pdf](#)

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Good morning Julie,

Thank you for the re-submission but since the Perthmore Subdivision is located outside of our area of control, therefore the Ministry of Transportation has no comments but I a side note when are they proposing in connecting the future road to Highway 7? The developer would need to do a pre-consultation with the Ministry of Transportation.

Thank you.



Alain Nadeau

Planner

Corridor Management Section | East Operations
Ministry of Transportation
347 Preston Street, Ottawa
613-720-2802 | alain.nadeau@ontario.ca



From: Julie Stewart <jstewart@lanarkcounty.ca>
Sent: September 12, 2022 4:07 PM
To: Julie Stewart <jstewart@lanarkcounty.ca>
Subject: 09-T-21001 Perthmore Subdivision - Phase 6 - RE-SUBMISSION

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good afternoon,

The County of Lanark has received a **re-submission** of a Draft Plan of Subdivision for Perthmore Phase 6. The following items are attached to this e-mail:

- Circulation Letter from the County of Lanark, dated September 12, 2022.
- Status Letter from the County of Lanark, dated June 25, 2021.



June 25, 2021

Perthmore Enterprises Inc.
c/o Maurice Decaria
80 Dufferin Street
P.O. Box 20054
Perth, ON
K7H 3M6

**Re: STATUS REPORT – Perthmore Subdivision – Phase 6
Part Southwest Half and Part Northeast Half Lot 3, Concession 2,
Geographic Township of Drummond, being Part 1 on 27R-7125 and Part 1
on 27R-8420 except PL88, 27M-3, 27M-14, 27M-16, 27M-21, 27M-55 and
Parts 3, 4 on 27R-7540, now in the Town of Perth, County of Lanark
County of Lanark File No. 09-T-21001**

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The subject property is designated as Settlement Area in the Sustainable Communities Official Plan of Lanark County, and Residential and Environmental Protection in the Official Plan of the Town of Perth. The subject lands are currently zoned as Residential First Density (R1) and Environmental Protection (EP) within the Town of Perth Zoning By-law No. 3358. The application indicates that a concurrent Zoning By-law Amendment application has been submitted to the Town of Perth. The proposed draft plan includes 42 lots for single detached dwellings, 23 lots for semi-detached dwellings, for a total of 65 proposed residential lots. The draft plan also includes four (4) blocks for future medium and high density development and two (2) blocks for stormwater management purposes.

The proposed lots will have frontages on newly created internal streets and on extensions of the existing Perthmore Street and Senators Gate Drive. A future arterial road is proposed on the landholding which is located to the east of the proposed subdivision lots to provide future access from Perthmore Street to Provincial Highway No. 7.

The subject lands are bounded to the east by the proposed Arterial Road and the Perth Long Swamp Provincially Significant Wetland and the existing Perthmore neighbourhood to the south and the west. The remnant lands and Provincial Highway No. 7 are to the north.

A Notice of Application and Consultation was circulated to the required agencies and to members of the public on March 19, 2021.

The Town of Perth received a Zoning By-law Amendment application in December 2020 and deemed the application complete. The Town of Perth subsequently held a public meeting for the associated zoning by-law amendment. At the May 11, 2021, Town of Perth Committee of Whole meeting the matter was discussed and the Committee of Whole voted to defer consideration of the related zoning by-law amendment until further studies are completed for the remaining developable lands.

Correspondence from the Town of Perth's Director of Development Services, dated June 8, 2021, states that "the Town does not support the plan of subdivision application at this time. Additional studies are required to support the application. The submitted EIS and planning rationale need to be better integrated to provide clear policy direction. There is a requirement to provide 5% of the developable lands as parkland. As per the Town of Perth's Official Plan policy, the current plan of subdivision application is premature until a secondary plan and infrastructure master plan are completed for the remaining developable lands to provide a comprehensive, integrated, and long-term planning approach."

As part of the Notice of Application and Consultation conducted by the County of Lanark, as well as the Notice of Public Meeting for the Zoning By-law Amendment by the Town of Perth, the Rideau Valley Conservation Authority (RVCA) provided detailed comments dated April 15, 2021. RVCA has indicated that the application "is not consistent with the Provincial Policy Statement, the Town's Official Plan or the original recommendations of the EA process for the arterial road" and as a result, the RVCA can not support the proposed subdivision application or the requested zoning by-law amendment at this time. RVCA has also indicated that remain open to ongoing and continued discussions regarding the development. The RVCA requests clarification on the following matters:

- The provision of a hydrologic impact statement which considers water balance and is integrated with the stormwater management report. This should also demonstrate presence or absence of organic soils in the areas indicated on our mapping through geotechnical evaluation. Before work is commenced on this report, we recommend a specific pre-consultation meeting to ensure appropriate scoping of any report;
- Confirmation or clarification regarding the EIS raised in this letter (delineation of potential pike spawning habitat, use of a 50 metre setback from the regulatory boundary until a more fulsome analysis is completed, discussion regarding significant woodlands and wildlife habitat);
- Plotting of current and proposed regulatory boundaries of the Perth Long Swamp, the 1:100 year floodplain and their related regulatory setbacks;
- Reconciliation between the arterial road EA, the EIS and the proposed development (lands in public ownership, maintenance of connections on both sides of the arterial road);
- Provision of a schedule indicating which lands are seeking to be re-zoned.

The complete RVCA comments are attached to this Status Report.

The Ministry of Environment Conservation and Parks also provided comments to the Notice of Application and Consultation for the Draft Plan of Subdivision Application in an e-mail to the County Planner on June 3, 2021. MECP has identified that due to the number of occurrences of Species At Risk in the area of the development including, Eastern Musk Turtle, Butternut, Chimney Swift, Snapping Turtle, Barn Swallow, Blanding's Turtle, Little Brown Myotis, Eastern Meadowlark, Bobolink, Gray Ratsnake, Peregrine Falcon, Monarch, Wood Thrush, and Rusty Blackbird. MECP notes that there was no supporting information for how specific species at risk and their habitat were evaluated on site or how it was determined there would be no impacts to species at risk or their habitat. Based on the occurrence information available in the area of the site there is potential for species at risk and species at risk habitat on site. More information will be required about how this was evaluated to determine if authorization is required under the Endangered Species Act, 2007 (ESA).

Summary

Based on the comments from the Town of Perth, the Rideau Valley Conservation Authority, the Ministry of the Environment, Conservation and Parks as well as several comments received from members of the public, it is recommended that the County of Lanark notify the applicant that the County will defer further consideration of the application for the draft plan of subdivision (09-T-21001), until such time as the Town of Perth receives the necessary supporting studies, as detailed in their correspondence of June 8, 2021, the Rideau Valley Conservation Authority receives the necessary studies detailed in their correspondence of April 15, 2021 and the MECP receives enough information in regards to the evaluation of species at risk outlined in their correspondence of June 3, 2021.

As a result of the documentation received to date from the agency and public comments, there are various issues to be resolved before the County will further consider the Application.

It is recommended that the owner / agent proceed with addressing the issues / questions raised by the members of the public as well. Please include the County on all correspondence.

Yours truly,



Julie Stewart, MCIP RPP,
County Planner
Encl.

cc: McIntosh Perry
Town of Perth
Rideau Valley Conservation Authority
MECP

- Comment Response Letter from McIntosh Perry, dated August 5, 2022.
- Draft Plan of Subdivision, signed August 5, 2022.
- Planning Rational Report, prepared by McIntosh Perry, dated August 5, 2022

Hard copies and a USB will be circulated to the Town, RVCA, Lanark County Public Works and MTO. The list of the documents submitted with the re-submission are included in the attached County letter of today's date, if you wish to receive copies of any of these documents please advise and I will circulate in a separate e-mail.

Please do not hesitate to contact me with any questions or for further information.

Thank you,

Julie

Julie Stewart, MCIP RPP

County Planner

99 Christie Lake Road

Perth, ON K7H 3C6

(613)267-4200 ext. 1520

jstewart@lanarkcounty.ca

www.lanarkcounty.ca

Based on the revised submission, the absence of requested additional studies, comments from agencies and the absence of all agency comments, the County of Lanark is not in a position at this time, to recommend approval of the application. Therefore if the applicant / owner wishes to proceed to a decision on the application, our recommendation would be to refuse the application for draft plan approval.

Please contact the County to coordinate a meeting with the agencies to review and discuss the comments received to date.

Yours truly,

A handwritten signature in black ink that reads "Julie Stewart". The signature is written in a cursive style with a large initial "J".

Julie Stewart, MCIP RPP,
County Planner
Encl.

cc: McIntosh Perry
Town of Perth
Rideau Valley Conservation Authority
MECP

From: [StewartLinda Bates](#)
To: [Julie Stewart](#)
Subject: Re: 09-T-21001 Perthmore Subdivision - Phase 6 - RE-SUBMISSION
Date: October 6, 2022 4:22:56 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Julie

Here are some comments we wish to make. Could you also answer our questions? We have no objection in principle to the development of this site.

1. R1 to R4 for the building of apartments on Block 54 is ok with us.
2. R1 to R3 - Are these classes only bungalows and semi's as MacIntosh Perry state? We're ok if that is the case. If R3 allows for more dense development i.e. so called stacked town houses such as constructed on Senators Gate Dr, then restrictions should be tighter i.e R1. This would restrict inappropriate increases in density, and a repeat of past mistakes.
3. We believe the Developer has 29.7 hectares in total. We understand the Province requires 5% of land for parks. We understand part of the land is wetland and trees. These should be protected, and the Developer should not be allowed to cut down any further trees!
4. Rather than requiring the Developer to provide 5% for parks in each section to be developed, why not make it a condition that they provide 5% of the total development now? They give up no more land in total! The Developer should level and grass the land so it could be used for soccer, and an outdoor rink in the wintertime. They should also provide a children playpark. These do not have to be of an Olympic standard.
5. Sidewalks should be provided on all streets. There should also be a higher standard of street lighting than what was provided on Senators Gate Dr.
6. We agree with MacIntosh Perry that the existing streets can take the additional traffic generated by 93 new units. We agree there is no need for a third road access at present.
7. We believe that the current Town Plan allows the Developer to build a further 226 units. Are the County and the Town going to hold them to this number? We wouldn't object over the life of the Plan for this number to increase by say 10%. We would object if say the unit numbers exceed 250. We are sure you appreciate if they carry on with the same density as this proposal is, then there will be many more than 226. The Developer should be required to provide much more open space. There is plenty of land here!
8. The Developers block 57 is obviously to provide a road access to the land between the cancelled bypass road and the housing on Street A. The Developer must see this as land for future development. If this requires further tree felling we would like this rejected.

We have no objection to increasing the number of bungalows proposed, so their total number of units becomes 94, if access to this area is restricted to pedestrians only.

9. If 4 of the semis are to have 8 dwellings, referred to as apartments, we would have no objection. If each of the 4 semis is to have 4 units each, then we would also have no objection, but the extra numbers should then come out of the 93 they are applying for.
10. The park shown as Block 58 is much less than 5% and is pathetically small. Our earlier suggestion should be pursued so there would be a much larger park Deeded to the Town. Otherwise, a much larger park than shown as Block 58 should be required. Our proposal could be located on the un-developed land behind the apartments and houses on Street A. A new access to this park could be constructed off Senators Gate adjacent to the existing apartments. We would have no objection to Block 58 being developed as residential if this larger park was provided.
11. We don't see any land being allocated by the Developer for affordable housing. We believe this is now Policy. We hope they are not being relieved of this duty.
12. We do not think that the Developer should be allowed to make a capital contribution in lieu of parks. There is little open space in the subdivision and additional public space should be a must!
13. We note that Block 55 is for storm water management. Are the 2 areas of land marked vacant which adjoin Block 55 also part of the storm water management system?
14. We have no objection to you circulating this email.

Stewart and Linda Bates

10 Antonio Way
Perth K7H 3R5
613 326 0956

From: Julie Stewart <jstewart@lanarkcounty.ca>

Sent: September 12, 2022 4:33 PM

To: Julie Stewart <jstewart@lanarkcounty.ca>

Subject: FW: 09-T-21001 Perthmore Subdivision - Phase 6 - RE-SUBMISSION

Good afternoon

You are receiving this e-mail, as you have previously provided comments to the County of Lanark.

Please see the information below and attached.

The information will also be available on the Lanark County web site later this week.

From: [Perthmore Residents Group](#)
To: [Julie Stewart](#)
Cc: [Joanna Bowes](#)
Subject: Re: FW: 09-T-21001 Perthmore Subdivision - Phase 6 - RE-SUBMISSION
Date: September 26, 2022 1:22:32 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

good morning Julie

thank you for sending us the re-submission documents.

We are very interested in the design and location of the Park.space.

1) there seems to be some confusion in McIntosh Perry's submission between the location of block 58 in June 29th Zoning plan and the zoning bylaw amendment drawing

2) the proposed park assuming Block 58 is the park only represents under half of the remaining greenfield site of 15.8 hectares. The PCA would advocate for 1 new large park more centrally located to service the entire Phase VI (the 93 households + future as of yet unidentified)

* see our presentation of 2021

please find attached power point slides indicating location issue in new documents and from our 2021 presentation

3) as this submission is only for half of the remaining greenfield site in Perthmore

Is there a road / utility layout that would show a complete view?

Is there still the possibility for the 3rd exit to connect to hwy 7?

Is there a need for a future pumphouse for the high density that would be built in the future towards hwy 7?

4) What would be the next process steps?

Is there a deadline schedule?

When does the town comment on the zoning?

When would public input be appropriate?

and finally as a community association is there anything that we can do to help in the process?

thanking you in advance

Mike Flynn, Pres of PCA

613-267-3783

22 Antonio Way, Perth On K7H 3R5



Issue of Block 58 identified in 2 different locations?



Block 58



On Mon, Sep 12, 2022 at 4:33 PM Julie Stewart <jstewart@lanarkcounty.ca> wrote:

Good afternoon

You are receiving this e-mail, as you have previously provided comments to the County of Lanark.

Please see the information below and attached.

The information will also be available on the Lanark County web site later this week.

Thank you,

Julie

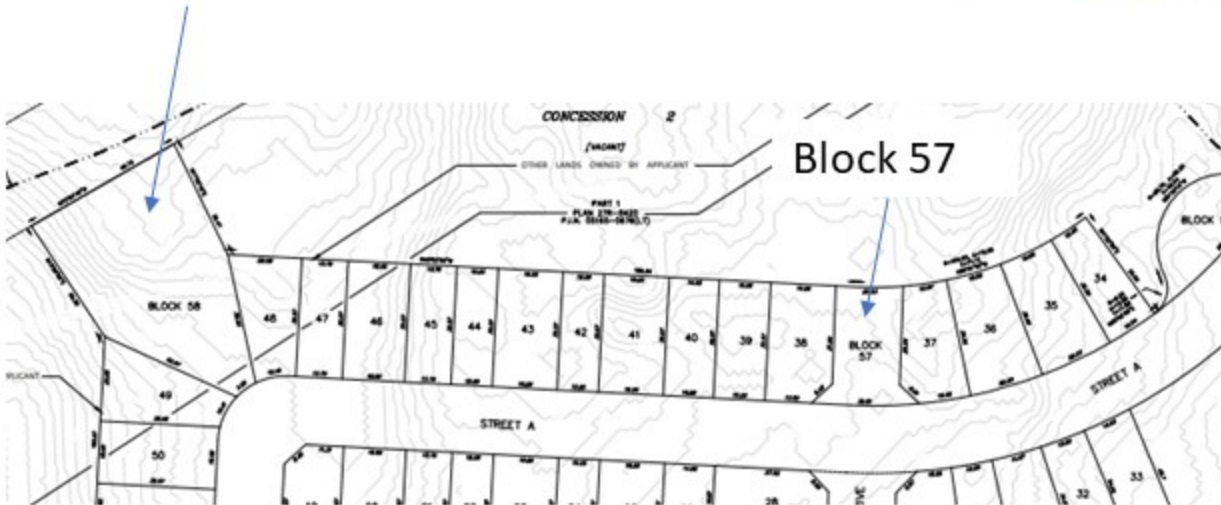
From: Julie Stewart <jstewart@lanarkcounty.ca>
Sent: September 12, 2022 4:07 PM
To: Julie Stewart <jstewart@lanarkcounty.ca>
Subject: 09-T-21001 Perthmore Subdivision - Phase 6 - RE-SUBMISSION

Good afternoon,

Issue of Block 58 identified in 2 different locations?



Block 58



Block 57

BLOCK 54	1,928	MEDIUM DENSITY
BLOCK 55	4,798	STORMWATER MANAGEMENT
BLOCK 56	701	STREET A CUL-DE-SAC
BLOCK 57	738	FUTURE STREET
BLOCK 58	2,673	PARKLAND
TOTAL LOT/BLOCK AREA (m²)	41,299	
STREET	AREA (m²)	LENGTH (m)
STREET A	10,003	500
PERTHMORE STREET	3,310	163
SENATORS GATE DRIVE	1,436	70
TOTAL SUBDIVISION AREA (m²)	56,047	

draft notes from latest submissions + previous submissions note

Park identified as Block 58 ... how much is useable space?

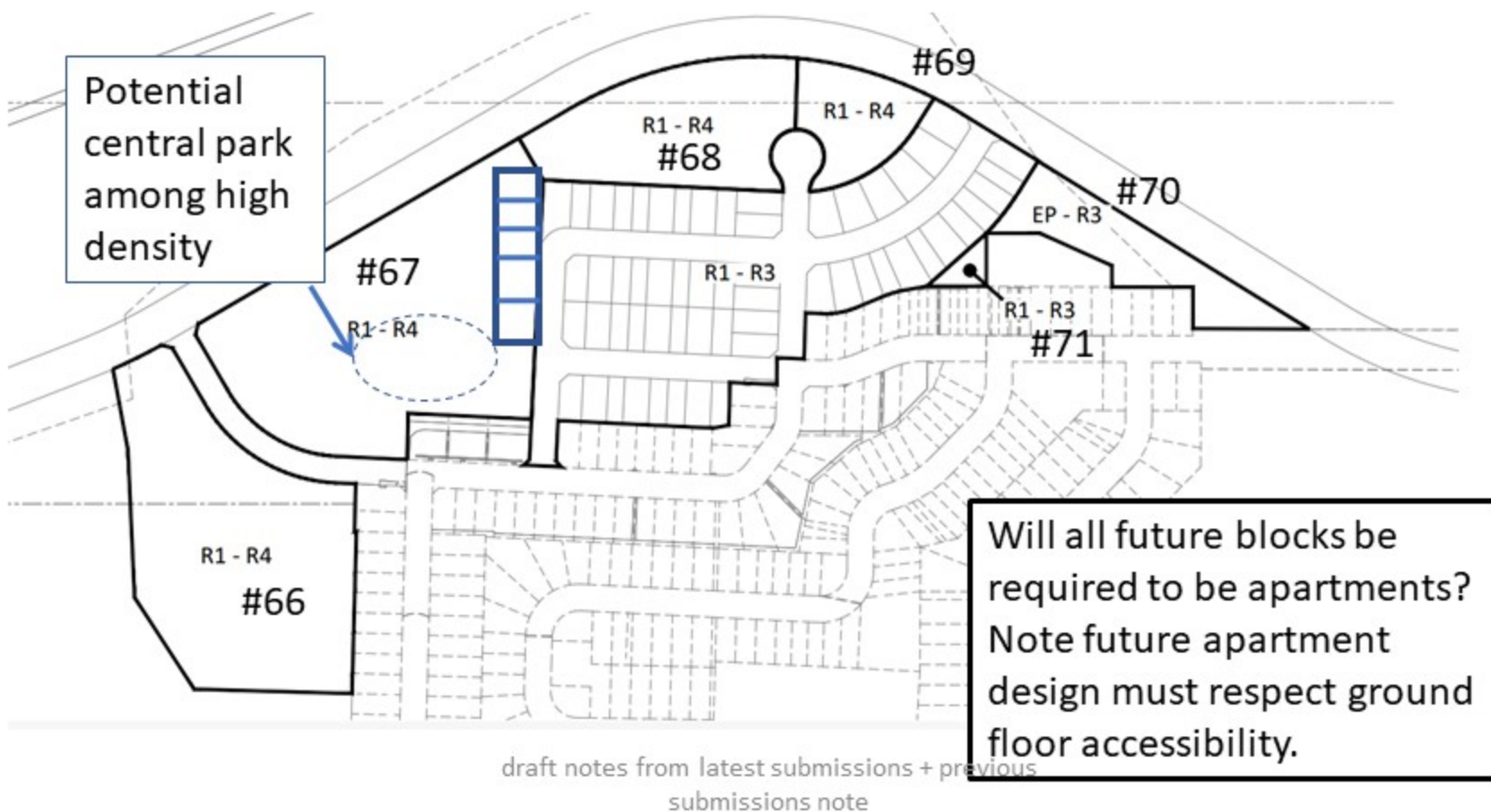
One large park for the remaining 15.9 hectares is advocated with more central location to all future builds

TOWN OF PERTH OFFICIAL PLAN POLICIES		
Policy Section	Policy Description	Comments
8.1.3.20 <i>Parks, Open Space and Natural Areas</i>	<ul style="list-style-type: none">• Parks, open space and natural areas are intended to serve a variety of purposes in the community, including:<ul style="list-style-type: none">- Natural areas and urban wilderness;- Areas which may be subject to environmental constraints, e.g. significant wetlands wildlife corridors and flood plains- Heritage sites and landscapes• Neighbourhood Parks shall be primarily dedicated to neighbourhood level facilities. It is the intent to further develop Perthmore Park during the life of this Plan to serve Perthmore residential area. No other new neighbourhood parks are proposed at this time.	<ul style="list-style-type: none">- <i>The proposed development includes Block 58 as parkland and it is noted that the updated Environmental Impact Statement speaks to the preservation of habitat within Block 58 as well as educational signage associated with the Perth Long Swamp.</i>

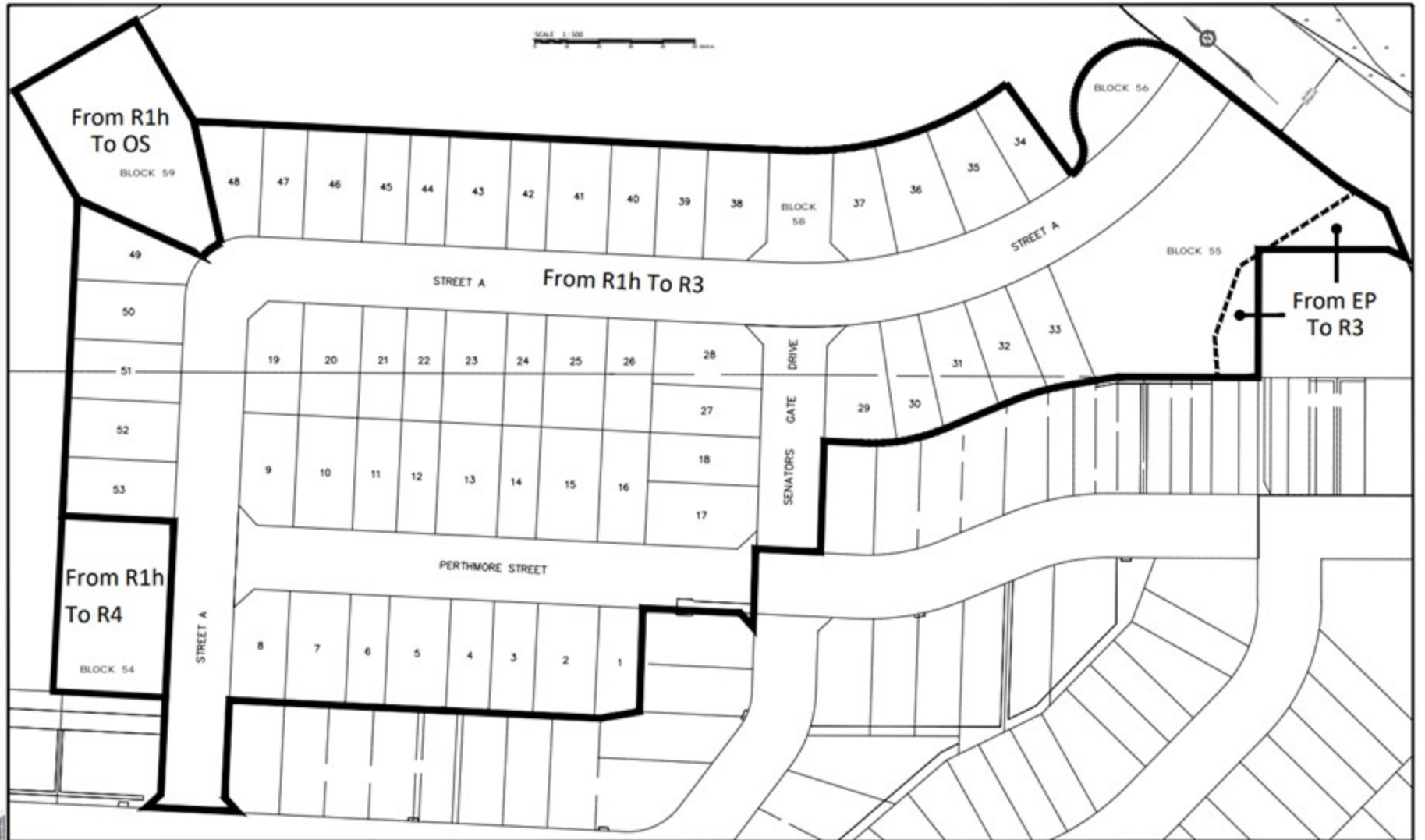
Future build block in proposal previous request 2021



71% Do not support approving future **zoning beyond** the 65 lots
Recommend identify as R1 placeholder for blocks 66, 67, 68. 69. 70. 71
98% support a new park



New lot plan for part of phase VI



LEGEND
 ENVIRONMENTAL PROTECTION AREA
 RESIDENTIAL FIRST DENSITY HOLDING
 RESIDENTIAL THIRD DENSITY
 OPEN SPACE
 RESIDENTIAL FOURTH DENSITY

EP
 R1h
 R3
 OS
 R4



McINTOSH PERRY
 1200 Burnside Centre, R.A. 411 Perth, Western Australia
 Tel: 819 387 8128 Fax: 819 387 7992
 www.mcintoshperry.com

Project No: 961
 Drawing No: 961
 Scale: 1:500

Client: PERTHMORE DEVELOPMENT CO. LTD
 Project Name: PERTHMORE ESTATES - PHASE 6

Drawing Title: ZONING BYLAW AMENDMENT SKETCH

Date: April 28, 2022
 Project Number: PP-13-9668
 Drawing Number: 01

draft notes from latest submissions + previous submissions note

Check and note all dimensions before proceeding with the work. Do not scale drawing.

SCHEDULE OF AREAS		
LOT/BLOCK	AREA (m ²)	TYPE
1	468	SINGLE DETACHED
2	674	SEMI-DETACHED
3	481	SINGLE DETACHED
4	472	SINGLE DETACHED
5	673	SEMI-DETACHED
6	429	SINGLE DETACHED
7	665	SEMI-DETACHED
8	587	SINGLE DETACHED
9	589	SINGLE DETACHED
10	649	SEMI-DETACHED
11	482	SINGLE DETACHED
12	430	SINGLE DETACHED
13	675	SEMI-DETACHED
14	430	SINGLE DETACHED
15	675	SEMI-DETACHED
16	522	SINGLE DETACHED
17	674	SINGLE DETACHED
18	528	SINGLE DETACHED
19	589	SINGLE DETACHED
20	649	SEMI-DETACHED
21	482	SINGLE DETACHED
22	430	SINGLE DETACHED
23	675	SEMI-DETACHED
24	430	SINGLE DETACHED
25	675	SEMI-DETACHED
26	522	SINGLE DETACHED
27	524	SINGLE DETACHED
28	657	SINGLE DETACHED
29	703	SINGLE DETACHED
30	515	SINGLE DETACHED
31	596	SINGLE DETACHED
32	514	SINGLE DETACHED
33	547	SINGLE DETACHED
34	491	SINGLE DETACHED
35	682	SEMI-DETACHED
36	682	SEMI-DETACHED
37	585	SINGLE DETACHED
38	667	SINGLE DETACHED
39	535	SINGLE DETACHED
40	522	SINGLE DETACHED
41	675	SEMI-DETACHED
42	430	SINGLE DETACHED
43	675	SEMI-DETACHED
44	430	SINGLE DETACHED
45	482	SINGLE DETACHED
46	649	SEMI-DETACHED
47	482	SINGLE DETACHED
48	612	SINGLE DETACHED
49	659	SINGLE DETACHED
50	649	SEMI-DETACHED
51	649	SEMI-DETACHED
52	649	SEMI-DETACHED
53	649	SEMI-DETACHED
BLOCK 54	1,928	MEDIUM DENSITY

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BLOCK 55	4,798	STORMWATER MANAGEMENT
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STREET A	10,003	500
PERTHMORE STREET	3,310	163
SENATORS GATE DRIVE	1,436	70
TOTAL SUBDIVISION AREA (m²)		56,047

Revised proposal:

5.6 hectares out of total of 29.7

*** 15.8 hectares is total phase VI of the 29.7 hectares

5.6 hectares x10,000 =56,000 sq m

5% of 56,000 = 2,800 sq m park identified 2,673

Note 5% of entire subdivision = 14,850 sq m

This proposed zoning:

- 35 bungalows
- 18 semi detached
- + 18 other side of semi
- * 4 semis (with 2 apartment dwellings)
- + 4
- 14 unit apartments 3 ½ stories high

=====

93 dwellings on 53 lots + 1 apt lot (block 54)

From: [Sarah MacLeod-Neilson](#)
To: [Julie Stewart](#)
Cc: "maurice@perthmore.com"; [Benjamin Clare](#); [Joanna Bowes](#); [Martin Czarski](#); [Evelyn Liu](#); [Claire Milloy](#); glen.mcdonald@rvca.ca
Subject: Perthmore Phase 6 RVCA comments
Date: February 23, 2023 12:34:45 PM
Attachments: [RVCAcomments_PerthmorePhase6_09-T-21001.pdf](#)
[230214_RVCA_SWM_Comments2_EL_CM.pdf](#)
[Perthmore Phase 6 - Technical Review Comments for revised version 2 EIS by McIntosh Perry Consulting \(002\).pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Julie,

Attached please find the RVCA's comment letter for the revised submission as well as the enclosed technical memos referenced in the letter. Please note that at this time our office recommends that any decision be deferred until additional details are provided as outlined in our letter. Please note we are available to discuss these comments as needed.

Regards,

Sarah MacLeod-Neilson
Planner
sarah.macleod-neilson@rvca.ca, ext. 1109



3889 Rideau Valley Drive
PO Box 599, Manotick ON K4M 1A5
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21-PER-SUB-0004

February 23, 2023

County of Lanark
Box 37
Perth, Ontario
K7H 3E2

Attention: Julie Stewart RPP, MCIP

Subject: PERTHMORE ENTERPRISES INC.; Concurrent Applications for Zoning Amendment Application (File D14-PE-12-20) and Plan of Subdivision (File No. 09-T-21001); Perthmore Subdivision Phase 6; Part Lot 3, Concession 2, Geographic Township of Drummond, now the Town of Perth; Roll Number: 09210300552370000000

Dear Ms. Stewart,

The Rideau Valley Conservation Authority (RVCA) has reviewed the subject application in the context of the following:

- Section 1.6.6.7 and Section 3.1 Natural Hazards of the Provincial Policy Statement under Section 3 of the Planning Act;
- The Rideau Valley Conservation Authority ("Development, Interference with Wetlands and Alteration to Shorelines and Watercourses" regulation 174-06 under Section 28 of the Conservation Authorities Act;
- The Mississippi-Rideau Source Protection Plan;

The following should be read in conjunction with previous comments provided by our office dated April 15, 2021.

Revised proposal

The RVCA understands that this original plan of subdivision has been revised to consider a reduced number of lots. A total of 53 residential lots comprised of 35 lots to be developed as single-family dwellings and 18 lots to be developed with semi-detached dwellings. A medium-density apartment building is also proposed on block 54 consisting of 14 units.

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Drummond/North Elmsley, Elizabethtown-Kitley, Merrickville-Wolford, Montague,
North Dundas, North Grenville, Ottawa, Perth, Rideau Lakes, Smiths Falls, South Frontenac, Tay Valley, Westport

The following information has been reviewed as the most recent submission received by our office. The Environmental Impact Statement and Preliminary Servicing and Stormwater Management Report were circulated to technical staff at our office for review. Please find these review comments enclosed with this letter.

- Planning Rationale Report – Perthmore Enterprises Inc.– prepared by McIntosh Perry Consulting Engineers Ltd., dated August 5, 2022
- Environmental Impact Statement – prepared by McIntosh Perry Consulting Engineers Ltd., version 2, dated August 5, 2022.
- Preliminary Servicing and Stormwater Management Report – Perthmore Subdivision Phase 6 - prepared by McIntosh Perry Consulting Engineers Ltd., dated August 3, 2022.
 - Draft Plan of Subdivision, prepared by McIntosh Perry Surveying Inc, dated June 29, 2022
- Zoning Bylaw Amendment Sketch, Perthmore Estates Phase 6, prepared by McIntosh Perry, dated August 5, 2022

Review comments

Ontario Regulation 174/06

As addressed in previous comments the majority of the subject property is located within areas regulated by RVCA in accordance with Ontario Regulation 174/06. This regulation is titled “Development, Interference with Wetlands, Alterations to Shoreline and Watercourses” and is made under Section 28 of the Conservation Authorities Act. In considering development within the 120-metre adjacent lands of a regulated wetland RVCA’s policies state that development may be permitted if “it has been determined that there is no interference with the hydrologic functions of the wetland or that the impacts to hydrologic function are mitigated in a manner acceptable to the RVCA.”

It is understood approval of a revised wetland boundary by MNR is pending. Our office would recommend that before any application is approved by either the subdivision or zoning approval authority that there be clarification of the status of the boundary and confirmation of the regulatory boundaries of both the PSW and floodplain and their respective setbacks. This will provide confirmation of the floodplain and wetland boundaries within which development is not permitted, and which lots may require development permits from the Conservation Authority due to encroachment into the 120 metre adjacent lands.

Planning Rationale

Regarding this document, the reviewing planner has the following comments:

-The report indicates that zoning will go from R1 and EP to R3 and R4, it is noted that the lots indicated on the zoning schedule (Appendix B) are not consistent with those indicated with the draft plan of subdivision, specifically blocks 59 and 58.

-The rationale provides that an updated Preliminary Servicing and Stormwater Management Report includes a water balance analysis to address 1.6.6.7 of the PPS. A review from technical staff indicated that it is not demonstrated how the water balance has been utilized to develop the stormwater management plan, it is also noted that low-impact development

methods should be integrated within the stormwater management plan. Clarification is required within both the EIS and water balance to address cumulative impacts on the wetland.

-With respect to Section 5.3 of the Town's Official Plan, it is not clear that natural hydrological characteristics have been maintained as targets within the water balance to ensure that hydrologic functions/linkages are maintained.

Draft plan of subdivision

- The boundary of the current and proposed boundary of the Perth Long Swamp PSW should be plotted on the draft plan as should the 120-metre adjacent lands.

- The boundary of the 1:100-year regulatory floodplain and its 15 m regulatory setback should also be plotted on this plan.

-The schedule of areas on the draft plan indicates Block 57 as a future street and Block 58 as parkland. However, Block 57 is also identified as parkland within the portion of the plan indicating the subdivision of lots. This should be updated for clarity.

-It is understood that the arterial road indicated in the draft plan is no longer being pursued by the Town of Perth. The proposed road should be removed from the draft plan for clarity.

Discussion

Our office appreciates the applicant's efforts to address our previous comments in the revised submission. From the perspective of our office, clarification of some details is required, and the following is raised for consideration.

In reviewing the submitted Draft plan of subdivision, Environmental Impact Statement and Preliminary Servicing and Stormwater Management Report the use of the "other lands owed by applicants" specifically the lands east of lots 34-48 and west of lots 49-54 is unclear and raises questions regarding future use. Within the EIS it is identified that the majority of significant habitat on these lands will be maintained, except for 1.5 ha of woodland. However, the Post-Development Drainage Area Plan and Lot Grading and Drainage Plan within the Stormwater Management Report appear to indicate grade changes. Therefore, it is presumed that these lands will be cleared, and additional vegetation will be lost. A clear understanding of the use of these lands is required to address any cumulative impacts on the hydrologic function of the PSW and lands within the regulated area. Furthermore, without a clear understanding of the use of these lands, it is uncertain if potential hydrologic impacts, such as flooding, and erosion have been appropriately addressed with respect to section 1.6.6.7 of the PPS, specifically *[c] minimize erosion and changes in the water balance and prepare for the impacts of a changing climate through the effective management of stormwater, including the use of green infrastructure and [d] mitigate risk to human health, safety, property and the environment.*

With respect to section 3.0 of the PPS, it appears that the majority of the area proposed for development is outside the mapped floodplain and regulation limit. However, this should be clearly indicated on the draft plan of subdivision to ensure development is avoiding any hazardous lands. Previously provided mapping from our office indicates organic soils in some areas proposed for development, these soils are identified within the PPS as a possible hazard. It is noted that the Stormwater Management Report (section 6.3) does identify that geotechnical

analysis will be addressed at the detailed design stage. Our office would reiterate that geotechnical information will be required to confirm that there are no risks associated with proposed future development or confirm that hazardous soils are not present or can be mitigated in accordance with provincial standards.

Recommendations and considerations

To address outstanding issues raised within this letter, particularly regarding the hydrologic impacts our office would seek clarification of the following:

-A discussion regarding the lands between the PSW and proposed lots, specifically lots 34-48 is recommended and should consider the cumulative impact of any future development of the PSW and its hydrologic function, the proposed wetland setback should be assessed with regard to any additional impacts.

-Identification of specific targets within the water balance to ensure hydrological functions are maintained, these targets should be addressed by the stormwater management plan. Low-impact development features should be integrated within the stormwater management design to achieve these targets. Additional details are provided within a technical review of the stormwater management report. Our office is available to discuss these details prior to any future revision.

- Confirmation of approval of the proposed regulatory boundary of the Perth Long Swamp should be provided. This boundary as well as the 1:100 year floodplain and their related regulatory setbacks should be included on the draft plan of the subdivision

In conclusion, our office would recommend that any decision be deferred until this additional information is provided to address the points above.

Yours Truly,



Sarah MacLeod-Neilson
Planner, RVCA

cc – Maurice Decaria, owner

cc – Ben Clare, agent

cc –Joanna Bowes, Town of Perth

cc – Martin Czarski, Watershed Ecologist, RVCA

cc – Claire Milloy, Groundwater Scientist, RVCA

cc – Evelyn Liu, Water Resources Engineer., RVCA

cc – Glen McDonald, Director of Planning and Watershed Science, RVCA

Encl: Environmental Impact Statement Technical Review Memo
Preliminary Servicing and Stormwater Management Technical Review Memo



Planning and Engineering - Technical Review Memorandum

Planning Authority: Lanark County

Planning Applicant: Perthmore Enterprises Inc. 80 Dufferin Street Perth ON

Ecology Review: EIS by McIntosh Perry Consulting Engineers Ltd. 115 Walgreen Road Carp ON

Date: February 10, 2023

Thank you for circulating the version 2 Environmental Impact Statement dated August 5, 2022 for review.

It is this reviewer's understanding that the revised EIS has been prepared for a 5.6 ha parcel of land versus a 49 ha area for version 1; the bulk of the information contained in the revised EIS remains essentially the same as that in the original submission for the Perthmore Estates Subdivision Phase 6 (Dec. 18, 2020). What has changed is the number of lots being proposed: 12 lots have been removed along with block 68 and 69 and replaced by a number of blocks for various uses including open space, stormwater management, high density development and access to other lands owned by the applicant.

The environmental impact upon the natural heritage features identified in the revised EIS will be a reported removal of "less than 1.5 hectares of FODM5-4 which is a Dry-fresh Sugar Maple, Ironwood Deciduous Forest (EIS v.2; Section 5.1, p.29)," which is less than that reported for the initial draft plan where it was proposed "to remove approximately 22 acres of the significant woodland (EIS v.1; Section 5.6, p. 33)" and significant wildlife habitat.

The net effect of this change will be to lessen negative environmental impacts to identified significant wildlife habitat/woodland natural heritage features. Although contrary to the intent of O.P. Policy 8.6.4.b.2. that "Development and site alteration shall not be permitted in significant wildlife habitat" and that "Development and site alteration shall not be permitted on adjacent lands to these natural heritage features unless it has been demonstrated through the preparation of an EIS that there will be no negative impacts on the natural features or on their ecological functions," the EIS contends that "This removal is anticipated to be primarily edge habitat" as stated in Section 5.3.1 (p.31).

This reviewer can accept this general conclusion but wishes to advise that this is dependent upon the applicant and his agents providing additional mitigation measures to minimize the effect of the reported loss upon the identified significant wildlife habitat/woodland; for example, retention of as much existing vegetation as is feasible within the rear yards of lots 34 through 48. Additionally, it is advised that any unavoidable loss of tree/vegetation cover should be compensated for, as noted in the revised EIS Section 5.3.1 (p.31) where, for example, it states that "It is proposed to off-set most or all of the loss of vegetation by planting within any under-vegetated areas within the proposed 30m-buffer adjacent to the Perth Long Swamp (for those areas within the revised plan of subdivision) and within non-functional areas of the Stormwater Pond block as wildlife habitat, where access is not required. Enhancing the

Technical Review Memorandum



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To S. McLeod-Neilson, Department of Science and Planning
From C. Milloy, P.Geo. & E. Liu, P.Eng., Department of Engineering and Regulation
Date December 20, 2022 (Revised February 14)
File **09-T-21001**, Perthmore Phase 6, Town of Perth, Lanark County, ON
Type Subdivision, municipally serviced
Subject **Maintaining water quantity, quality, and linkages, and addressing cumulative impacts via stormwater management**
Submission Preliminary Servicing and Stormwater Management Report
Perthmore Subdivision - Phase 6
McIntosh Perry Consulting Engineers Ltd., August 3, 2022.
Previous memorandum • April 13, 2021

Status

On behalf of the County of Lanark and the Town of Perth, professional geoscience and engineering staff have reviewed the above noted submission in support of concurrent zoning amendment and subdivision plan applications with the municipal planning authority. It is understood that this is the second stormwater management related submission for this application.

The RVCA understands that the subdivision plan has been modified since the previous technical submissions and that several blocks are now omitted from the subdivision application. The RVCA also understands that the Town of Perth no longer supports establishment of an arterial road to the east of the site, which may affect how the adjacent Provincially Significant Wetland is considered.

Based on our review of the current submission, it is recommended that the **Town and County request clarification** of and revision to aspects of the hydrological impact (water budget) assessment and the stormwater management plan prior to accepting the proposed subdivision servicing plan.

Considerations

The main considerations are as follows.

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North Dundas, North Grenville, Ottawa, Perth, Rideau Lakes, Smiths Falls, South Frontenac, Tay Valley, Westport



- 1) The **water budget** assessment does not but should provide specific targets for the stormwater management plan. See related items from the April 2021 memo, including those about the preservation of wetland hydrology etc.
- 2) **Low impact development** (LID) measures have not been but should be included directly in the stormwater management plan and design as per long-term direction from the province and current professional engineering standards. The current stormwater plan, which relies only on an end-of-pipe solution, is therefore insufficient.
 - a. The referenced best practices (roof leaders and swales) are also insufficient to address the provinces requirements for a **treatment-train approach**. Additional LID should be included and they should not be considered separate best practices but integral to SWM.
 - b. Water budget targets from above and types of LID would likely pertain to distributed infiltration, the preservation or creation and protection of specific types and sizes of pervious and vegetated areas, amended top-soils etc.
- 3) There appears to be or may be **conflict** between the proposals for tree retention etc. and the location / design of LID. Further, **easements** will likely be required to maintain LID features.

The following is also noted.

- many of the comments from RVCA's April 2021, memorandum remain valid and these should be considered once the water budget assessment is fully integrated into the stormwater management plan. This memorandum should therefore be considered in direction reference to RVCA's 2021 technical comments.
- Given that the available water budget has not been used in the stormwater management plan, it has not been reviewed in any significant way at this time.
- It is noted that pages from another report (for a project in Metcalfe) were mistakenly included in the submission, so a full review could also not be completed for that reason.

Respectfully,

and

C. Milloy, M.Sc., P.Geo.

E. Liu, P.Eng.