

*June 23, 2023*

Kristy Warwick  
Clerical Assistant Planning  
Lanark County  
99 Christie Rd.  
K7H 3C6

Dear Ms. Warwick:

**Re: Perthmore Subdivision Phase 6  
Draft Plan of Subdivision (File No. 09-T-21001)  
Zoning Amendment Application (File D14-PE-12-20)  
Part Lot 3, Concession 2, Geographic Township of Drummond (Now Town of Perth)**

This letter addresses the following comments received in response to the August 5, 2022 resubmission package in support of the Draft Plan of Subdivision application, received February 23, 2023.

- Rideau Valley Conservation Authority
  - Natural Hazards, O.Reg 174-06, Source Protection Comments dated February 23, 2023.
  - Stormwater Management Comments dated December 20, 2022, revised February 14, 2023.
  - Planning and Engineering – Technical Review Memorandum, dated February 10, 2023.
- Town of Perth
  - Environmental Services Comments dated October 7, 2022.
  - Development Services Comments, undated.
- Agency Comments
  - Hydro One, dated September 22, 2022.
  - Enbridge, dated April 5, 2021.
  - Ministry of Transportation, dated September 28, 2022
- Compiled Public Comments, dated October 6, 2022.

Please note that this comment response is also intended to address comments related to the Zoning By-law Amendment application provided by the Town of Perth and others. Accordingly, Town staff have been circulated on this resubmission.

The following plans and reports, which have been prepared or updated in order to address comments received, are submitted together with this comment-response letter.

- Comment Response Letter
- Revised Planning Rationale
- Revised Stormwater Management Report
- Revised Environmental Impact Study
- Overall Concept Plan
- Revised Draft Plan
- Revised Zoning By-law Amendment Sketch

Our office's responses to comments received are provided within the paragraphs below.

## RIDEAU VALLEY CONSERVATION AUTHORITY

### Natural Hazards, O.Reg 174-06, Source Protection Comments dated February 23, 2023

#### *Ontario Regulation 174/06*

1. 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 MNRF 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.

**MP Response:** *Further to October 20, 2022 correspondence from the MNRF, the Provincially Significant Wetland boundary has been updated. Accordingly, the draft plan has been revised to show the updated boundary. The 1:100-year regulatory floodplain obtained from the RVCA is also now shown on the plans.*

### *Planning Rationale*

1. 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.

**MP Response:** *The Zoning By-law Amendment sketch has been revised to correspond with the latest iteration of the Draft Plan of Subdivision.*

2. 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.

**MP Response:** *The EIS has been updated to address impacts on the wetland.*

3. 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.

**MP Response:** *Site-specific water balance targets has been identified and Low Impact Developments are incorporated into Stormwater Management plan to meet those targets.*

### *Draft Plan of Subdivision*

1. 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.

**MP Response:** *The setback on the draft plan has been revised so that it is consistent with the recommendations of the EIS. Specifically, the 30 metre setback is shown where development is proposed within 120 metres of the PSW.*

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

**MP Response:** *The 1:100-year regulatory floodplain is now shown on the draft plan.*

3. 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.

**MP Response:** *As shown on the revised Draft Plan of Subdivision, the Parkland will be located on Block 57. It should be noted that the current Draft Plan no longer contains Block 58.*

4. 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.

**MP Response:** *The arterial road has been removed.*

#### *Discussion*

In reviewing the submitted Draft plan of subdivision, Environmental Impact Statement and Preliminary Servicing and Stormwater Management Report the use of the “other lands owned by applicants” specifically the lands east of lots 34-48 and west of lots 49-54 is unclear and raises questions regarding future use.

**MP Response:** *Additional lands owned by the proponent to the northwest will be subject to separate Planning Act applications and additional studies for future development. It should be noted that development is no longer proposed on the lands to the northeast.*

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.

**MP Response:** *Lands northeast of lots 34-48 are not being considered for future development. The lands northwest of lots 49-54 will be developed in the future and can be addressed generally in the cumulative impacts of the EIS however exact details are unknown at this time and should be addressed as part of future development. It is not expected that this development will impact the hydrologic function of the PSW.*

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.

**MP Response:** *Comment noted. A geotechnical investigation will be provided at the appropriate juncture.*

#### *Recommendations and Considerations*

1. 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.

**MP Response:** *Lands northeast of lots 34-48 are not being considered for future development. The lands northwest of lots 49-54 will be developed in the future and have been addressed generally in the cumulative impacts of the EIS however exact details are unknown at this time and should be addressed as part of future development. It is not expected that this development (lots 49-54) will impact the hydrologic function of the PSW. Consideration is being given as part of the subdivision plan to retain as*

*much of the rear yard vegetation as possible within lots 34 – 48. The subdivision has been redesigned so that no drainage features are required at the rear of these lots.*

2. 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.

**MP Response:** *Site-specific water balance targets has been identified and an integrated Stormwater Management plan was developed incorporating Low Impact Developments to meet the identified water balance targets.*

### **Preliminary Servicing and Stormwater Management Report**

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.

**MP Response:** *Impacts of the proposed development on the wetland have been evaluated and mitigation measures are provided in form of Low Impact Developments.*

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.

**MP Response:** *A treatment train approach was implemented to incorporate the Low Impact Development designs into the overall Stormwater Management Strategy and Site-specific Water Balance.*

2. 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.

**MP Response:** *The Stormwater Management Plan has been revised to reflect the comment.*

### *Additional Servicing and Stormwater Management Comments*

1. 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.

**MP Response:** *The comments received from the Rideau Valley Conservation Authority in April 2021 were largely concerned with the proximity of development to the Provincially Significant Wetlands, and mapped floodplain. The current resubmission has considered and addressed previous comments received.*

2. 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.

**MP Response:** *The site-specific water balance targets has been identified and implemented into the overall SWM strategy.*

3. 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.

**MP Response:** *The report has been revised.*

### **Planning and Engineering – Technical Review Memorandum**

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).

**MP Response:** *Acknowledged.*

2. 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 RVCA File No. 21-PER-SUB-004 23 February 2023 Page 2 of 3 wetland buffers and creating habitat associated with the stormwater pond is expected to off-set the loss of primarily fringe habitat proposed for removal." It is further advised that all of the above is to be properly documented in a Tree-Vegetation Compensation/Saving Plan in keeping with the intent of the Town of Perth O.P. Policy 8.6.4.h.3.v. requiring identification of mitigation measures for the loss of natural heritage features.

**MP Response:** *The EIS has been updated to include more specific wording. Plans to mitigate any unavoidable loss of tree/vegetation will be sought as a condition of draft plan approval.*

3. The other important planning matter remaining unresolved is the revised EIS's silence about any future plans the applicant may have for those lands located between the proposed 30 m wetland buffer and Blocks 56, 57, 58 and Lots 34 through 48 shown on the revised draft plan of subdivision and labelled as "Other Lands Owned by the Applicant." This omission should be addressed now through an analysis of the cumulative impacts of the revised subdivision proposal along with any future development planned within this area identified as Significant Wildlife Habitat on EIS Figure 5.

**MP Response:** *The subdivision has been redesigned to remove any development within the remainder of the significant woodlands/wildlife habitat.*

4. Why propose and show a 30-metre wetland buffer on the revised draft plan of subdivision that will only provide protection to those areas located between Blocks 56 and 58, Street A and the provincially significant Perth Long Swamp? This would suggest that the applicant is intending to development this area and have pre-approval granted for a 30 meter buffer for subsequent development without such an analysis having been completed in advance of that occurring; this is considered to be a premature recommendation until such time that this matter has been addressed and prior to approval of the current draft plan of subdivision.

**MP Response:** *The setback on the draft plan has been revised in response to the comment, and so that it is consistent with the recommendations of the EIS. Specifically, the 30 metre setback is shown where development is proposed within 120 metres of the PSW.*

5. It is this reviewer's opinion that any decision regarding a wetland buffer/setback should be withheld until such time that there is more certainty about these two outstanding major planning issues. As such, it is advised that the 30 metre wetland protective zone be removed from the revised plan, except for that part touching upon Block 56 and the most southerly extent of Street A.

**MP Response:** *Pursuant to this and other comments, the setback on the draft plan has been revised and clarity regarding the lands in question has been provided.*

6. Assuming that all the above can be amicably addressed by the applicant and his agents, this reviewer will be in a position to advise the planning authority that the revised draft plan can be approved with regards to meeting the applicable natural heritage policies contained in the Town of Perth Official Plan, which is conditional upon the applicant satisfying the following conditions of draft plan approval.

- Construction of rear yard fencing that is wildlife friendly for those lots backing onto significant wildlife habitat/woodland.
- Please note that as previously stated, no comments have been provided regarding impacts to Species at Risk as this is a delegated responsibility of the province of Ontario.

**MP Response:** *We believe the EIS and subdivision redesign has addressed the above concerns. Maintaining vegetation at the rear of lots 34 – 48 is being considered. Installation of fencing may affect retention of vegetation. Please confirm the desire to implement rear yard fencing with the retention of woodland vegetation. The applicant is open to recommendations for this concern.*

## TOWN OF PERTH

### Environmental Services

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.

**MP Response:** *An overall/comprehensive conceptual development plan has been provided to Staff, and revisions have been made pursuant to Town Staff input provided during an April 18, 2023 meeting and otherwise.*

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.

**MP Response:** *A Sensitivity Analysis prepared by McIntosh Perry (dated March 12, 2020), and previously accepted by the Town, confirms that a tertiary entrance is not required for the proposed development. MP Traffic Engineering Staff re-confirmed this finding in relation to the adjusted development proposal as communicated to Staff by way of an October 12 e-mail. It has recently been communicated by Staff that primary purpose of the tertiary entrance in the near term would be to serve as a construction access, to divert traffic away from existing local roads, particularly Perthmore Street. McIntosh Perry suggests that a Construction Management Plan would be a conventional and appropriate tool to address subdivision construction concerns, and that this could be identified as a condition of draft plan approval.*

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.

**MP Response:** *The report has been revised.*



4. 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.

**MP Response:** *Items 1 and 2 have been addressed in the resubmission. We respectfully ask that the Town finalize their review and move forward with recommending conditions of draft plan approval.*

## Development Services

1. 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.

**MP Response:** *The arterial road has not been used in the assessment of the impacts of Phase 6. It has been considered in the cumulative impacts as potential future development.*

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

**MP Response:** *The proposed park has been adjusted. Furthermore, initial support for a park ‘hub’ has been expressed adjacent to the proposed 30 metre buffer from the Long Swamp Provincially Significant Wetland (PSW). It is expected that parkland serving future subdivision approvals (i.e. Phase 7) will also be proposed in this area.*

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

**MP Response:** *The butternuts noted on the map are not in close proximity to Phase 6. However, a butternut review should be completed prior to any construction activities in undisturbed areas. The re-assessment should occur in advance of the construction works and following draft plan approval. No butternuts were observed in the area to be cleared in 2022.*

4. 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 indicate4s 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.

**MP Response:** *The Planning Rationale has been revised in order to address the items noted above. Block 55 will be developed with a Stormwater Management pond and, as part of the proposed Plan of Subdivision, it is typical in our experience for such lands to be zoned the same as the rest of the development. The*

*parkland has been located adjacent to the 30 metre setback from the Perth Long Swamp intentionally. The following is recommended in Section 6.1 of the EIS:*

Educational signs and other materials are to be provided for the future park lands (Block 58) which are within and adjacent to natural features.

5. 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.

**MP Response:** *The arterial road has been removed from the draft plan.*

6. 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.

**MP Response:** *Please refer to the above response to Environmental Services Comment 2.*

7. Blocks 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 the draft plan.

**MP Response:** *The EIS addresses significant wildlife habitat. A TPP will be provided as per RVCA comments.*

8. It appears as though the developer is intended 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.

**MP Response:** *The SWM plan has now been revised.*

*As previously noted, it is typical for stormwater management ponds to share the same zone category as the remainder of the development / neighbourhood.*

9. 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.

**MP Response:** *The report has been revised.*

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

**MP Response:** *An overall conceptual plan that situates the current phase of development within the wider context of the Perthmore development has been provided to and discussed with Staff.*

11. No major review of these items or others has been completed against the Official Plan or Zoning By-law as it is of 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.

**MP Response:** *McIntosh Perry has responded to the comments provided by the Town of Perth by way of both the Comment Response Document and revised drawings and studies. As such, we look forward to receiving the conditions of draft plan approval at the appropriate juncture.*

## OTHER AGENCY COMMENTS

### Hydro One

1. Hydro One has no comments at this time.

**MP Response:** *Acknowledged. Could the appropriate staff/person at the Town of Perth or County obtain conditions of draft plan approval from Hydro One?*

### Enbridge

1. Enbridge Gas Inc. does not object to the proposed application(s) however, we reserve the right to amend or remove development conditions. This response does not constitute a pipe locate, clearance for construction or availability of gas.

**MP Response:** *Acknowledged. Could the appropriate staff/person at the Town of Perth or County obtain conditions of draft plan approval from Enbridge?*

2. In the event that easement(s) are required to service this development, and any future adjacent developments, the applicant will provide the easement(s) to Enbridge Gas Inc. at no cost.

**MP Response:** *Acknowledged.*

### Ministry of Transportation

1. 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.

**MP Response:** *A connection to Highway 7 will be pursued in the future whenever it is determined to be necessary to support development by transportation engineers. It is acknowledged that Pre-Consultation with the MTO will be required at that juncture.*

## PUBLIC COMMENTS

### Perthmore Community Association

1. There seems to be some confusion in McIntosh Perry's submission between the location of block 58 in June 29<sup>th</sup> Zoning plan and the zoning bylaw amendment drawing.

**MP Response:** *Block 58 has been removed in the revised Draft Plan of Subdivision and the Zoning By-law Amendment Sketch.*

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).

**MP Response:** *Following a review, it is noted by MP that the proposed park satisfies the minimum parkland requirements as required by relevant municipal and provincial policy.*

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 3<sup>rd</sup> 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?

**MP Response:** *Further to discussions with staff, and as previously noted, an overall conceptual plan that situates the current phase of development within the wider context the Perthmore development has been prepared.*

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.

**MP Response:** *We defer to Town Staff for a response to this comment.*

### Stewart and Linda Bates

1. 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 stackedtown 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.

**MP Response:** *The proposed Residential Third Density (R3) zone will permit the single and semi detached dwellings as shown on the Draft Plan of Subdivision.*

2. 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!

**MP Response:** *An Environmental Impact Statement (EIS) has been completed in support of the proposed development. The EIS provides recommendations and mitigation measures to ensure that the intent of applicable natural heritage policies is upheld.*

3. 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.

**MP Response:** *As provided by applicable policy, the required parkland is calculated in accordance with the total area affected by the current Draft Plan of Subdivision application.*

4. 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.

**MP Response:** *Sidewalks and lighting will be provided pursuant to the Town of Perth requirements as required in applicable planning policies.*

5. 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.

**MP Response:** *Comment acknowledged.*

6. 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!

**MP Response:** *We defer to Town Staff for a response to this comment.*

7. 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.

**MP Response:** *Block 57 as shown on the previous site plan has been removed.*

8. 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.

**MP Response:** *Semi-detached dwellings with basement apartments are proposed on Lots 50, 51, 52, and 53. Each semi-detached dwelling contains two units, resulting in a total number of 16 units on the lots in*

question. The total number of dwelling units is acknowledged accordingly within relevant application materials.

9. 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.

**MP Response:** *The proposed park as indicated on the Draft Plan of Subdivision satisfies applicable parkland requirements. The lands behind Lots 34-48 are constrained as they are considered significant wildlife habitat and the lands behind Lots 49 to 53 and Block 54 are subject to future development plans.*

10. 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.

**MP Response:** *Eight basement dwelling units and fourteen apartment dwelling units have been incorporated as a result of discussions with Town Staff regarding the promotion of affordable housing units within the municipality.*

11. 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!

**MP Response:** As previously noted, the proposed park on the Draft Plan of Subdivision satisfies the minimum parkland requirements. As such, no cash-in-lieu of parkland is required.

12. 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?

**MP Response:** *While the adjacent lands have been considered as part of the wider SWM strategy, there is no direct flow to these lands.*

## CONCLUSION

We trust that the responses provided above, and the enclosed resubmission items adequately address the comments provided by Agency Staff and that upon review of the documents provided, County Staff will be in a position to compile conditions of Draft Plan approval, and Town Staff will be in a position to advance the Zoning By-law Amendment application. Please do not hesitate to contact our office if any additional information is required.

Sincerely,

A handwritten signature in blue ink, appearing to read "V. Vivekanandan".

Vithulan Vivekanandan, MES Pl.  
Planner