



**OFFICIAL PLAN UPDATE:**  
**PLANNING REPORT ON**  
**CHANGES TO THE REDLINE DISCUSSION DRAFT OP**

☒ **ACTION**

☐ **INFORMATION**

TO: Mayor & Members of Council  
FROM: Forbes Symon, Senior Planner, Jp2g Consultants Inc.  
DATE: May 6, 2025

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**RE: Official Plan Update: Recommended Changes to the Redlined Discussion Draft OP Based on Comments Received**

**Recommendation:** *That Council provide direction to the Consultant on changes to the Redlined Discussion Draft of the Town of Perth Official Plan Update, based on comments received. Further, that Council requests the Consultant to bring forward a final version of the Official Plan Update for Council's consideration.*

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Town of Perth retained the services of Jp2g Consultants Inc to undertake a review and update of its Official Plan. The Official Plan Update project is now in the final stages, having held an Open House (January 29, 2025) and Public Meeting (February 4, 2025) on the "Redlined Discussion Draft of the Perth Official Plan Update". The public and agencies were requested to submit comments on the Redlined Discussion Draft by March 7, 2025, and agencies comments by March 28, 2025.

This report includes all comments received on the Redlined Discussion Draft as an appendix. In addition, the report summarizes the public and agency comments received and makes a series of recommendations for Council's consideration on changes to the Redline Discussion Draft based on comments received. The report is in two sections. The first covers First Nations and agency comments, while the second section covers public comments.

**FIRST NATION/AGENCY COMMENTS ON REDLINE DISCUSSION DRAFT AND RECOMMENDED ACTION**

**1. Comments from Algonquins of Ontario Consultation Office:**

We appreciate that the Town of Perth acknowledges the duty to consult with the Algonquins of Ontario in Section 6.8 Archaeological Resources. I am attaching the Algonquins of Ontario Archaeological Standards and Guidelines and would like it to be included in the Town of Perth Official Plan Update.

**Response:** *The AOO Archaeological Standards and Guidelines is an excellent resource for those conducting archaeology within the unceded settlement area of the Algonquins of Ontario. It is recommended that Section 6.8, Archaeology Resources, paragraph #2 be amended with the addition of the following sentence:*

*"For those conducting archaeology within the Town of Perth, reference to the Algonquins of Ontario Archaeological Standards and Guidelines, is required."*

*It is also recommended that Section 6.8.1, paragraph #2 be amended with the addition of the following sentence:*



*“For those conducting archaeology within the Town of Perth, reference to the Algonquins of Ontario Archaeological Standards and Guidelines, is required.”*

## **2. Comments from Métis of Ontario:**

The Métis Nation of Ontario’s LRC Branch acknowledges your information notice. The MNO reserves the right to request additional information, meetings and consultations in respect of the project should the MNO deem it to be necessary.

**Response:** *No change required.*

## **3. Comments from Enbridge Gas:**

Enbridge Gas does not object to the proposed application(s) however, we reserve the right to amend or remove development conditions. This response does not signify an approval for the site/development.

**Response:** *No change required.*

## **4. Comments from Mississippi Rideau River Sources Water:**

We have reviewed this for DWSP purposes, we have no concerns, except we have two small comments:

- we can’t seem to find Appendix A1 in the revised OP or the original on Perth’s website. Can you share that with us so we can review?
- at some time in 2025, the policies and threats managed by our Source Water Protection Plan will change, at that time the Town’s OP and Zoning will have to be updated to reflect this change (Note: Town will have 5 years to get their OP into compliance with the new Source Protection Plan, with 3 years after that to get their Zoning into compliance). It is too early to do now, but we just wanted to advise in advance.

**Response:** *Clarified that there is no Appendix A1. There may be benefits in adding the following statement to the end of Section 5.10:*

*“It is anticipated that the Source Protection Plan will be revised to align with the 2021 SWP Technical Rules. Once completed and approved, the revised Source Protection Plan will be in force and effect and will govern this Official Plan and Planning Act decisions.”*

## **5. Comments from Ministry of Mines:**

No concerns were identified in the draft regarding sections 4.4 and 5.3 of the PPS 2024 under the planning interests of the Ministry of Mines.

**Response:** *No change required.*

## **6. Comments from Tay Valley Township:**

What do the red dots on the north of Perth on the Nat Heritage Systems map indicate?

**Response:** *Mapping error to be fixed for final draft.*

## **7. Comments from Lanark County Planning (Approval Authority):**

I recommend a study be committed to in the OP that would comprehensively review the issue of infill and redevelopment. It should assess opportunities and fiscal benefits, identify strategic sites, corridors, and areas, contemplate greyfield options, set ambitious targets, and recommend enabling policies. The study could result in an OP amendment, Secondary Plan(s) and/or the designation of strategic growth areas.

**Response:** *Include in both Section 3.2, Housing (new “g”) and Section 8.1.1, Residential Development Concept, a policy reference to an “Infill & Intensification Study to be completed which would assess opportunities and fiscal benefits, identify strategic sites, corridors, and areas, contemplate greyfield options, set ambitious targets, and recommend enabling policies. Such a study may result in an OP amendment, Secondary Plan(s) and/or the designation of strategic growth areas within the Town.”*

Key issues such as housing density targets should be reviewed in light of the County’s in-progress Growth Management Study and its preliminary findings which suggests a materially higher rate of high-density development may be required. This review should also consider projected housing market demand, land development economics and the efficient land and infrastructure and fiscal sustainability.

It would be worthwhile to review the cited ‘2024 Residential Lands Needs Assessment’ and ensure it is consistent with the ongoing Watson’s GMS being completed by the County. Depending on the adoption of the GMS and the related County OP update, these references in the Perth OP may need to change, be approval authority modified, or addressed via an OP amendment after the fact, depending on how the processes and timing line up.

**Response:** *The County’s GMS has been an evolving document over the course of the Perth OP Update project. The Town is required to ensure its Official Plan is consistent with the Lanark County Sustainable Communities Official Plan. It is understood that the County is in the process of undertaking various studies related to a pending Official Plan Update. The Town could incorporate some of the findings and directions in these supporting studies or they could wait until the Lanark County SCOP is updated and then make the changes to the Perth Official Plan. Direction is required on the extent Council wishes efforts to be made to ensure the Perth OP Update is consistent with the Watson GMS, including a review of the 2024 Residential Lands Needs Assessment.*

Efforts should be made to provide clarity on, and pathways to implementation for, affordable housing. This would include articulating triggers for inclusion in developments of various types, scales and built forms and specific mechanism as to how it will be implemented in relation to development and redevelopment.

**Response:** *There is a need for clarification on the exact changes being suggested. It is assumed that Section 8.1.3.9, Affordable Housing would be the area where there would be policy change. It is unclear exactly what is being requested, and this requires further exploration with the County Planning Manager. Again, without the benefit of clear Lanark County Official Plan policy on Affordable House, it is unclear whether the comments are suggestions or requirements by the Approval Authority.*

A review of employment areas and the new PPS policies and Planning Act definitions should be undertaken as they relate to the Industrial and Business Park designations.

**Response:** *The PPS requires the identification of “employment lands”. The Town’s Class 3 industrial sites and the Business Park could be identified as “employment lands”. This work will be coordinated with staff.*

Recommend a distinct review be completed of the OP and Planning Act to ensure that those powers that are expressly permitted only where authorized by an Official Plan are contemplated in the Plan. While many are contemplated, some you may wish to review for local applicability include:

- Inter-governmental CIP grants or loans 28(7.2)
- Minor by-laws — delegation Section 39.2 of the Act in the Plan to allow for the possibility of implementation in the future? (Allows delegation of holding end temp by-laws)
- Sustainable design elements on any adjoining highway – Site Plan Control –41(4)(e)
- Verify use of “any highway” language meets test of widening requirements for Site Plan Control – 41(9)
- Reduction in Cash in Lieu for sustainability criteria in a redevelopment - 42(6.2)
- Development Permit System – 70.2
- While included, review acquisition of land and public works conformity provisions of the Plan to ensure they reflect planned and needed infrastructure within the Plan’s new horizon.

**Response:** *It is recommended that this review be completed and any necessary administrative edits to the policies be executed.*

Comments provided on the draft land use schedules – many detail observations that could be improved (see Appendix A comment for details)

**Response:** *Comments on schedule changes to be incorporated into final version of mapping.*

#### **8. Comments from South East Health Unit:**

Section 1.4, A Development Strategy for Perth, of OP to include reference to being supportive of active transportation, provision of equitable access to amenities, supportive of green business initiatives, prioritize universal accessibility, foster social connectedness, promote public engagement, enhancing ecosystem services, and inclusion of accessible design standards.

**Response:** *This report supports the recommended changes #2, 3, 4, 5, 7, 8 as presented. Change #1 should be referenced in 1.4 (8) and not 1.4 (1). Change #6 should be referenced in 1.4 (11).*

Section 3.1.1, Perth Settlement Area Expansion (ii) could include reference to incorporating climate-resilient designs.

**Response:** *Section 3.1.1 is not the appropriate section to refer to climate-resilient design. Section 3.4, Infrastructure & Public Service Facilities, currently refers to impacts of climate change and design resilient to climate change. No additional references to climate-resilient design are recommended beyond what is in Section 3.4.*

Section 3.2 (A), Housing include reference to universal accessible standards.

**Response:** *Section 3.2 A is not the appropriate section to refer to universal accessible standards. Section 3.2 (F) could be modified to include reference to universal accessible standards.*

Section 3.2 (B), Housing include reference to incorporating sustainability measures and approaches to help maintain current supply of housing.

**Response:** *Section 3.2 B is not the appropriate section to refer to sustainable design standards. Section 3.2 (F) should be modified to include reference to sustainable design standards.*



Section 3.2 (E), Housing include reference to transit-oriented design principles.

**Response:** *There is no public transit within the Town of Perth. Transit-oriented design principles speak to walking, cycling, high density/compact form at transit nodes, mixed use, less vehicle friendly. Many of these features are captured elsewhere in the Official Plan related to active transportation, compact design, mixed uses. No change is recommended.*

Section 3.3, Economic Base, include reference to “integrating green business initiatives, equitable access to telecom infrastructure, and creating an inclusive welcoming environment.

**Response:** *Section 3.3 should include reference to “supporting green business initiatives”. Section 3.3 already has a new statement about “Specific attention will be paid to ensuring a robust and modern telecommunication infrastructure to support business development and growth and encourage remote work opportunities.” There may be benefits in modifying Section 3.3. to include reference to “equitable access to telecom” and an “inclusive working environment”.*

Section 3.4 (A), Infrastructure & Public Service Facilities include reference to “public service facilities using climate-resilient designs”.

**Response:** *Section 3.4 (A) could include reference to climate-resilient design, although it is implied with the existing reference to “impacts of climate change”.*

Section 3.4 (D) change “investigated” to “recommended”

**Response:** *Agreed.*

Section 3.4 (K) include reference to “social equity and universal accessibility”.

**Response:** *Agreed.*

Section 3.5, Heritage Conservation include reference to “promoting community engagement in heritage preservation”.

**Response:** *Section 3.5 is not the appropriate location for inclusion of the above statement.*

Section 3.6, Natural Heritage Features include reference to encouraging habitat restoration efforts.

**Response:** *Section 3.6 is not the appropriate location for the inclusion of above statement. Section 8.6.1, Environmental Protection Area Designation – General Scope, should include reference to promoting habitat restoration (amend last paragraph).*

Section 3.7, Community Improvements include reference to prioritizing inclusive, sustainable and accessible designs in redevelopment projects. Incorporating sustainability into community enhancements supports environmental goals, strengthens economic resilience, and improves social well-being, making the area more attractive to residents, businesses, and visitors.

**Response:** *Agreed.*



Section 3.8, Public Health and Safety to include reference to natural based solutions to climate change.

**Response:** *Section 3.8 is not the appropriate location for inclusion of the above reference. 5.9.1(b) Objectives for Climate Change, would be a more appropriate place to include this reference.*

Section 3.10, Healthy & Sustainable Communities include reference to a welcoming and diverse community, prioritizing universal accessibility and equitable resource distribution, incorporating inclusive design principles, and interconnected green spaces.

**Response:** *The comments related to welcoming and diverse community, and universal accessibility and equitable resource distribution should be incorporated into Section 3.10. The comments on inclusive design principles and interconnected green space would be more appropriate in Section 8.7.3, Parks and Open Space Designation, Objectives.*

Section 4.2, Mission Statement to include reference to diverse, sustainable and inclusive economic growth.

**Response:** *Section 4.3, Beliefs, would be a more appropriate location for including this reference. It is not advisable to modify mission statements through OP Update.*

Section 4.3 include a new bullet point which references prioritizing sustainability, diversity, and accessibility which fosters long-term economic resilience and inclusivity.

**Response:** *Agreed.*

Section 5.4, Waste Management (A) & (C) include reference to enhanced waste diversion strategies such as composting and recycling initiatives and include reference to waste-to-energy opportunities.

**Response:** *Waste diversion is already acknowledged in 5.4 (D). There may be benefit in including “waste-to-energy opportunities” in Section 5.4 (D).*

Section 5.5, Transportation, to include reference to “prioritize accessibility for individuals with disabilities” (5.5 (A) 1) and include reference to “cycling supports (bike parking, repair stations)” (5.5 (A) 3).

**Response:** *Reference to “prioritize accessibility for individuals with disabilities” could be included in 5.5 (A)3 which focuses on transportation corridors and complete streets. Reference for cycling support could be included in Section 5.5 (A) 4.*

Section 5.5.1, Provincial Highways include the statement “Developments should also integrate sustainable design measures to adapt to climate change and mitigate their environmental impact on the surrounding area.”

**Response:** *Section 5.5.1 is not the appropriate section for this reference. Section 5.9.1 already adequately addresses the issue of sustainable design and impacts of climate change. No change recommended.*

Section 5.5.7, Sidewalks to include the statements “prioritize universal accessibility and pedestrian safety” and “Additionally, sidewalks and pathways could incorporate climate adaptation measures, such as reducing heat islands, managing floods, and addressing extreme weather risks, to enhance resilience and safety.”

**Response:** *Section 5.5.7 should be expanded with a new policy section (c) which reads as follows: “The Town will plan*

*sidewalks to prioritize universal accessibility and pedestrian safety and incorporate climate adaptation measures.”*

Section 5.5.9, Recreation Trails to incorporate reference to “priority given to non-motorized users and universal accessibility particularly when integrated with motorized vehicles.”

**Response:** *Agreed.*

Section 5.5.11, Access to Public Roads to include reference to design to accommodate universal accessibility and pedestrian safety and Emergency access routes shall incorporate climate-resilient materials and designs to ensure operational reliability in extreme weather conditions.

**Response:** *The first recommendation is somewhat prescriptive and has been addressed elsewhere in the plan. There is merit in Section 5.5.11 (F) referring to emergency access being resilient to impacts of climate change.*

Section 5.9.1, Objectives for Climate Change, Energy Efficiency/Conservation and Community Sustainability be modified to include reference to “supports renewable energy sources” (A), “climate-resilient design” (C), and “maximize the use of renewable energy systems” (D) “incentive programs to encourage energy-efficient design” (D) and “enhance biodiversity and ecosystem services” (E).

**Response:** *Agreed to changes to 5.9.1 (A), 5.9.1 (C) and 5.9.1 (E). The changes to 5.9.1 are not recommended as the points are already addressed.*

Section 5.9.3, Principles for Community Sustainability be modified to include reference to “incorporating climate-resilient materials and practices” (i), “regular monitoring and public reporting on water quality indicators” (iii), “increasing use of permeable surfaces” (v), “supporting public art” (xi).

**Response:** *Agreed to changes to 5.9.3 (i), (v) and (xi). The changes to 5.9.3 (iii) are not recommended as it is provincial law that the Town monitors and reports on water quality.*

Section 6.1, Heritage, Statement of Purpose be modified to include reference to “community engagement”.

**Response:** *Heritage matters related to community engagement are prescribed by the Ontario Heritage Act. No policy change is recommended.*

Section 6.2, Heritage Goal Statement be revised to include reference to “promoting sustainability and inclusivity”.

**Response:** *No change as this matter is addressed elsewhere in the Plan.*

Section 6.3, Heritage Objectives, be modify to include reference to “promoting community involvement in preservation efforts” (A), and “accessible and inclusive” (D).

**Response:** *No change, community involvement addressed above. Not appropriate section for reference to accessible and inclusive and has been addressed elsewhere in the Plan.*



Section 7.1, Public Health and Safety, Introduction be modified to include reference to “incorporating climate resilience and mitigation measures”.

**Response:** *No change as matter is addressed elsewhere in the Plan.*

Section 7.6, Wildland Fires be modified to include reference to “climate resilient and sustainable fire mitigation practices” and “alternative mitigation measures will be explored to minimize environmental impact”.

**Response:** *Agreed.*

Section 8.1.3.10, Residential Design Principles include reference to “welcoming and inclusive”.

**Response:** *Agreed.*

Section 8.2.3, Commercial Uses, Urban Design Guidelines be modified to include reference to “prioritizing native and drought-resistant plants”, “Universal design” and “incorporating green infrastructure, such as bioswales and permeable pavements”.

**Response:** *Agreed.*

Section 8.2.4.5, Residential use in Upper Storeys be modified to include reference to “while ensuring accessibility and energy-efficient upgrades” (A), and “supports sustainability through compact urban living” (B).

**Response:** *No change – accessibility in the downtown is addressed through Section 8.2.4.4 and compact urban living is addressed elsewhere in the Plan.*

Section 8.3.1, Public Service and Institutional Facilities, Scope be modified to include reference to “prioritize accessibility, diversity, inclusivity and environmental sustainability.”

**Response:** *Agreed.*

## **9. Comments from MTO:**

Thank you for updating the OP as per MTO July 2023 comments. The only comment we could not located comments on Appendix 5 changes as requested.

(Original request - Insert the following text as one of the points in Appendix 5: “MTO will require permits for any location signage that are within 400m from MTO right-of-way or are visible from Highway 7. All signage must be 3m from the ROW, shown on the site plan, and a permit is required. The permit application can be submitted online using the Highway Corridor Management Online Services at: HCMS - MTO's online permit application wizard (gov.on.ca).”

**Response:** *Changes to Appendix 5 should be incorporated into draft OP.*

## **10. Comments from CP Rail:**

Reference to the “Guidelines for New Development in Proximity to Railway Operations (2013)” should be made to Section 8.1.3.7, Lands abutting the railway.

**Response:** Agreed

## **GENERAL PUBLIC. DEVELOPER COMMENTS ON REDLINE DISCUSSION DRAFT AND RECOMMENDED ACTION**

### **1. Comment from Louise McDiarmid**

Concern regarding the protection of wetlands given recent changes to provincial policies.

**Response:** Email correspondence with Ms. McDiarmid by staff and consultant agreed with her comments. Noted that it is now up to local municipalities to protect natural features such as wetlands. I believe wetlands must be protected for a wide range of reasons, first and foremost for their carbon storage and regulator function with extreme weather events. The natural heritage system map developed for the OP Update identifies all the wetlands that surround Perth and afford them a high degree of protection.

### **2. Comment from Jack Tannett**

Requests clarification and more prominence for a “construction management plan” as noted in Section 5.5 (E), Traffic Impact Study.

**Response:** Clarification of the intent of the proposed policy change has merit. Changing a “construction management plan” (i.e. construction traffic routes) from “may be required” to “shall be required” has merit. It is worth noting that all developments have some form of construction traffic. Having the developer map out the construction truck route, even if it obvious, has merit and would be captured through required agreements.

### **3. Comment from Penny & Thies Schacht**

Do not agree with the proposed 25% affordable housing per development. Big burden for developers and may turn away development. Affordable housing should not be on the shoulders of the developers.

**Response:** There are many goals, objectives and policies in the Perth Official Plan which are related to establishing targets for the supply of affordable housing and increasing the supply of affordable housing. Section 8.1.3.9 contains the specific policies related to affordable housing and directs Council to “ensure creation of affordable housing when approving new development. Larger subdivisions and housing projects will be required to demonstrate the extent of affordable housing provided. The existing and proposed policies do not require individual developments to provide 25% of the proposed residential units as affordable. It is anticipated that on average 25% of all units are to be affordable. It is understood that the provision of affordable housing is extremely challenging, and that most “affordable” units have some sort of sponsorship from senior levels of government. Under Section 2.2, Housing of the 2024 PPS, planning authorities shall establish and implement minimum targets for the provision of housing that is affordable.

The Lanark County Sustainable Communities OP does not set any targets for the provision of affordable housing. The Lanark County 10-year Housing and Homelessness Plan (2019) acknowledges that local municipalities are to set affordable housing targets in their Official Plan but does not make a recommendation of what the targets should be. It should be noted communities of Carleton Place, Mississippi Mills and neighbouring Drummond North Elmsley all have 25% affordable housing targets.

*Council has the authority to revise the 25% affordable housing target, but it may be worth waiting until the issue of provision of affordable housing is dealt with in a County-wide basis through the SCOP pending update. Direction required.*

#### **4. Comment from Perthmore Development Co. Ltd. (Gemtec)**

There are two areas of land under Perthmore ownership that presently do not appear to have land use designation on the draft Official Plan Schedule A. The first of these areas (identified as Area A on the sketch below) is immediately south of the Town limits in the vicinity of Highway 7, while the second of these areas (identified as Area B on the sketch) is to the south of Perthmore Glen and north of North Street North and west of Perthmore Street.

It is acknowledged that these lands are presently identified as constrained; Area A is identified as Provincially Significant Wetland, and Area B is identified as floodplain. Nevertheless, Perthmore has long-term development aspirations of these lands and it is anticipated that their characteristics may evolve in the future, especially if higher-order transportation corridors are pursued. It is understood that some time ago Perthmore completed an assessment relating to natural heritage constraints in the vicinity of Area A and that the Town was provided with a copy of this assessment.



Accordingly, on Schedule A it is requested that Area A is designated Highway Commercial (which is consistent with the designation of the lands to the immediate west and a logical designation given the proximity to Highway 7), and that Area B is designated Commercial.

**Response:** *Both properties identified (A & B) are currently and proposed to be designated "Environmental Protection" which recognizes their status as regulated provincially significant wetlands. It appears that the edge between "Residential" and "Environmental Protection" has some overlap and should be a hard edge which will be changed in the update. The EP designation is the appropriate designation of the lands based on approved public information. It is not appropriate that the Official Plan Update process redesignate the requested lands and that it is much more appropriate for the property owner to initiate their own Official Plan Amendment process, present their argument and justification for the removal of lands from the EP designation, have that information peer reviewed and ultimately supported by the Ontario Ministry of Natural Resources and Forestry. No change recommended.*

On draft Official Plan Schedule B (Transportation) a future proposed arterial roadway is identified. The Schedule and associated policy should make it clear that the alignment of the arterial or any other roadway connections to Highway 7 may evolve depending on a number of factors, including cost sharing, technical studies, and nearby development patterns.

**Response:** *Agreed.*

Section 3.2 reads in part: "The housing mix desirable for the Town of Perth is intended, over time, to reduce the percentage of low-density residential development (i.e. singles, semi and duplexes) and increase the supply of medium density residential development (i.e. tri-plexes, quads, townhouses and small apartments)." and contains the following density targets:

- Low Density = 50 to 55% of future residential development
- Medium Density = 30 to 35% of future residential development
- High Density = 10 to 15% of future residential development

By restricting the percentage of medium and high-density units to 40-50 percent, these targets may in fact prevent the development and supply of medium and high density and more affordable dwelling units. In order to satisfy related Provincial Planning Statement policies and local affordable housing objectives, Staff are strongly encouraged to provide more flexible targets.

**Response:** *The density targets are intended to be interpreted as general ranges. It is also intended that for larger multi-phase developments the targets would apply to the overall development and not individual phases. Clarification of the intent of the draft policies in this regard has merit.*

Section 5.5.6 ("Road Improvements") should make reference to Schedule B, should acknowledge that road improvements includes work to the both the existing and planned transportation network, and should acknowledge that projects may be initiated by the County, municipality, private sector, or a combination of these (e.g. with sharing of costs).

**Response:** *The draft policies essentially defer to the Town's Transportation Master Plan regarding road improvements. This Master Plan document will identify improvements to existing and new roads and such reference in the OP is not appropriate. Additional policies including reference to Schedule B, and reference to the various road authorities who may do work on roads (MTO, County, Town, private sector) have merit. Policy direction on the financing of road improvement projects is not appropriate and is not recommended.*

Section 5.5.11 should be expanded upon, in part to establish if stated requirements apply to individual development sites or subdivisions. For example, Policy 5.5.11(A) requires a 9m width for access to public roads. Is this asphalt width or right-of-way? Is this for development sites? Single family dwellings? New public rights-of-way? This section should also acknowledge that accesses may already be in place.

**Response:** *Clarification of the policy's application is appropriate. The intent is that the policy generally applies to subdivision and condominium development but could also apply to individual site developments. The 9 m width is intended to be right of way width of the connection to the public road – representing a laneway connection and not a new local road which would need to be a minimum of 18.5 m as per Section 5.5.4. Policies should acknowledge that this policy is recommended for existing development and required for new development.*

The references to NFPA – an American self-funded non-profit organization – within the Official Plan (Sections 5.5.11 and 7.6) are problematic as presented in that there is limited public access to this information. At minimum, it is suggested that the standards/guidelines that are referred to within the Official Plan be made available elsewhere or included as appendices to the Official Plan. My recollection is that although the NFPA 1140 may be helpful and appropriate in some cases, there are also guidelines/standards that may not relate to the local context, for example those relating to minimum right-of-way widths, turn radii, etc.

**Response:** *Agreed and suggest NFPA standards be removed and simply reference in 5.5.11(B) that the figures as being the "Town's Fire Protection Standards". In section 5.5.11 (C) the NFPA simply be deleted and the sentence end "...topography, rail crossings, etc. of each site."*

Policy 7.3.2.11 triggers Site Plan Control for development within 120 metres of a watercourse/waterbody/wetland. Please confirm the basis for this modification and which land use types this applies to?

**Response:** *The policy in Section 7.3.2.11 is derived directly from O. Reg 254/23: Prescribed Areas – Section 41 of the Act (Planning Act) which is specific to site plan control and reflects the latest provincial policy position on site plan control*



*application. The Regulations state that a “prescribed area” for the purposes of Section 41(1.2) of the Planning Act are areas within 300 m of a railway line or 120 m of a wetlands, shoreline, lake, river or stream. The understanding of Section 41(1.2) is that site plan control does not apply to development involving 10 or less residential units unless the property is within a “prescribed area.” No change recommended.*

Some of Section 8.1.1. b (re: design principles for new residential neighbourhoods) appears as though it might have been prepared in relation to another area of Perth. Further, the principles may be desirable for an overall neighbourhood, but it should be acknowledged that not every development application will be able to or will be expected to satisfy all principles. For example:

- a. Further to item i), it doesn’t always make sense to provide a full range and mix of housing and density types and densities. The scale of development is critical here.
- b. Further to item ii), and specifically in relation to Perthmore, a grid roadway network may not be practical given existing development, the potential future arterial /Highway 7 connection, and environmental constraints.
- c. Further to item vi), could Staff please confirm what is intended by “Facilitate alternative design concepts...”
- d. Items xi) and xii) do not seem to apply to Perthmore.

**Response:** *There would be benefit in clarifying that the policies apply when dealing with larger multi-phase developments and that they are to be applied to the overall development and not necessarily to an individual phase of the development. The reference to “road patterns that generally follow a grid pattern has merit. The idea of “facilitate alternative design concepts” is intended to speak to the discussion and negotiation that goes on between the Town and a developer when considering the development of the property. They are simply items on an agenda to be discussed and how they may be accommodated, although matters such as “pedestrian-friendly streetscape” is not a question of “will” it will be provided but rather “how” it will be accommodated. Section 8.1.1 b) xi. does apply to Perthmore. Section 8.1.1. b) xii is very specific in terms of the land that it does apply to.*

Policy 8.1.3.1 d) could be interpreted as restricting development to four storeys and is somewhat at odds with Policy 8.1.3.5 d) and 8.1.3.10 a) 19. iii), which acknowledge permitted heights of up to 6 storeys for some lands, including Perthmore. This is simply being brought to Staff’s attention.

**Response:** *Policy 8.1.3.1 d) speaks to maintaining a generally ground-oriented housing form (e.g. 4 storeys or less). The use of the word “generally” does imply flexibility. The policy could be clarified with “except as otherwise permitted in this Plan” statement or by deleting the “e.g.” reference to 4 storeys and allow policies elsewhere in the Plan to govern height of apartment buildings.*

Pursuant to Policies 8.1.3.2 and 8.1.3.12, which among others, speak to uses permitted on lands designated Residential, both apartment dwellings and neighbourhood-serving commercial uses are permitted/encouraged within the Official Plan. It is requested that mixed-use buildings be expressly identified as being permitted within 8.1.3.2 in order to reduce any confusion around this in the future. For example, it does not seem as though a four or five storey building with ground floor commercial/personal service with residential units on the upper floors is expressly permitted. In fact, paragraph 8.1.3.12 (d) seems to provide language that would contradict such a proposal.

**Response:** *Mixed use buildings is something that is typically found in downtown Perth and not in residential neighbourhoods. There has been one mixed use building approved on a site specific basis. Direction from staff and Council on mixed use buildings is requested. Should we maintain the current policies (potentially with clarified intent) or do you add “mixed use residential buildings, in accordance with Section 8.1.3.12” as a permitted use in Residential areas?*

Policy Section 8.1.3.4 (Housing Densities) should be made less prescriptive to ensure that there can be overlaps in uses and densities. For example, townhouses or small apartments that exceed 60 units per gross hectare should be permitted. Similarly, policy support for apartment buildings of up to six storeys in height contradicts the establishment of a maximum of 100 units per gross hectare for apartments.

**Response:** *Clarification of the intent of the densities to be a general range and not “prescriptive” has merit. Suggestion would be to include the word “general” in the opening statement “Council’s policy is to provide for different densities within the following general ranges.” Council also has the option of changing the density ranges and reducing the amount of low density and increasing the projected amount of high density.*

Policy 8.1.3.4 c) specifies that new neighbourhoods should have a density of 26-34 units per net hectare. Perthmore is a low-density neighbourhood and has a density of approximately 29 units per net hectare. There are several policies within the plan that encourage the construction of affordable housing and incorporating a mix of medium and high density built forms. For the housing mix provided in Section 3.2 to be achieved, the overall density target of 26 to 34 units per hectare will need to be broadened.

**Response:** *Clarification of intent has merit. The density range is for the overall impact of a multi-phase development and not a specific phase. The policy could also indicate that density targets should not be a barrier to efforts to achieve affordability targets.*

The density ratios provided within Policy 8.1.3.5 b) may be impractical to implement, even if the development area is greater than 2 hectares. For example, Perthmore Phase 6 is approximately 3.2 net hectares (5.5 gross hectares) and doesn't satisfy these requirements. A tasteful unit mix is nevertheless provided, incl. a small apartment building, semis (some with basement apartments), and singles. Stringent ratios such as these could impede development from supplying housing pursuant to market demand at any given time and it is suggested that the ratios are broadened or that language is softened.

**Response:** *It has been the long-standing policy of the Town to require new multiphase developments to include a broad range of mixed of density and unit types. This policy has merit, and it has helped shape the current phases of the Perthmore subdivision. Clarification of intent has merit. The density range is for the overall impact of a multi-phase development and not a specific phase.*

References within the Official Plan to the provision of affordable housing (incl. those within Policy 8.1.3.9) should be consistent with applicable Provincial policy. Furthermore, policies encouraging higher density development (see comments 3, 11, 12, and 13 above) will likely translate into a greater supply of affordable housing within the Town of Perth, which will have a positive effect on local supply and affordability.

**Response:** *Agreed. The definition of affordable has been expanded in the 2024 PPS to include “housing for which the purchase price is at least 10 percent below the average purchase price of a resale unit in the municipality.” The definitions in the OP related to affordability such as Section 8.1.3.9 should be updated to reflect the current definition.*

The classification of roads within future phases of Perthmore hasn't yet been established, but it is likely that small apartment buildings may be proposed to front on roads that are not classified as major collectors or arterials. Accordingly, it is requested that Section 8.1.3.10 Residential Design Principles, paragraph (a) 19. is revised to permit apartment buildings to be located on local roads, where supported by appropriate justification.

**Response:** *It has been a long-standing policy of the Town to require new apartment building having frontage on arterial or collector roads. Providing an option for apartments on local roads with justification may have merit but caution is suggested. Staff and Council direction is requested.*

Section 8.1.4 addresses lands within Perth referred to as 'new residential area.' We are not aware of any associated designation within the draft Official Plan schedule. The policies within the section seem to apply to certain development areas. Additional clarity within this section would be appreciated.

**Response:** *It is agreed that these policies were developed for the "new residential area" annexed into the Town of Perth in 2009. Renaming the title of Section 8.1.4 to "Special Policies for the 2009 Annexed Residential Lands" and any policy reference has merit. A clarifying statement in the preamble to Section 8.1.4 has merit.*

In part, Policy 8.1.4.2 a) reads, "The mix of housing types and densities will be designed to meet the projected requirements of future residents and which are consistent with the housing policies of this Plan." This is similar to the statement provided within Policy 8.1.3.4 b), which reads "The specific mix of housing approved through the registration of the plan of subdivision should reflect community housing needs at the time." Official Plan policy should be relaxed in order to ensure that higher density, more affordable housing can be proposed and supplied by proponents of development.

**Response:** *The existing policies to meet housing densities and mixes does not present barriers to higher densities and affordable housing. No changes recommended.*

There are several references to the allocation and potential restriction of servicing capacity, including policies within Sections 5.2.1 and 8.1.4. Can staff confirm if allocation is administered in accordance with Appendix 7 ("Servicing Capacity Allocation Protocol")? Are there other servicing allocation priorities in the Town that Perthmore should be made aware of?

**Response:** *Servicing allocation in the Town of Perth takes place in accordance with Appendix 7 and is achieved through the draft plan of subdivision/condominium process, site plan process, rezoning process and other means recognized by provincial guidelines. There is currently sufficient sanitary treatment capacity to service the existing and planned development within the current boundaries of the Corporation of the Town of Perth, including Perthmore.*

Will policy 8.1.4.2 b) continue to apply? This depends on how the "New Residential Area" designation will be treated.

**Response:** *It is recommended that the policies continue to apply to the 2009 Annexed Residential Lands.*

Natural Heritage Features Policy 8.6.4 (h) 1., which pertains to 'Linkages, Corridors, and Wetlands,' refers to the inclusion of a 30-metre setback. See Figure 2 below. It is my understanding that linkages and corridors within the Natural Heritage System are themselves represented within the Official Plan as a 30-metre buffer from significant natural heritage features. Can staff please confirm that the linkages and corridors comprise a 30-metre buffer and that no additional buffer applies to these features?

**Response:** *Linkages and corridors are considered wildlife habitat and includes a 30 m setback the same as a watercourse or wetland. Linkages and Corridors are part of the Natural Heritage System of the Official Plan Update. Development proposed within 30 m of the boundary of Linkage or Corridor would trigger the need for an Environmental Impact Assessment. No change recommended.*

## **5. Comment from Caivan (Perth GC) Limited (WSP)**

On behalf of our client, we submit that the outcome of OLT-23-00534 – specifically the outcome of Caivan’s OPA appeal – should be implemented into the Town’s forthcoming Official Plan. As a means of addressing this issue on an interim basis, we propose that a notation appear in the OP’s Schedules indicating that the Western Annex Lands are currently subject to a private appeal in OLT-23-00534. This notation can later be removed through a housekeeping amendment when the outcome of OLT-23-00534 is known. In terms of grounds for this proposed notation, Caivan relies upon all of its various submissions in support of its major redevelopment proposal, which is currently the subject of Tribunal-led mediation... We respectfully submit that, as the “Perth Golf Course lands” are not designated as “New Residential Area” on Draft Schedule A Land Use, policies referring to the “Perth Golf Course” should not be included in Section 8.1.4 New Residential Area Designation, and subsequent subsections.

**Response:** *This matter was referred to the Town’s Legal Counsel for direction. There is no objection to adding a notion to the scheduled to indicate the golf course annex lands are subject to an OLT appeal. The other requested changes are not recommended, and it is felt that the OLT Appeal should be allowed to sort matters out.*

## **6. Comment from Bonita Eloise Ford**

Might the Town include 1:350 in the Official Plan to state its intention to move towards that standard, even if RVCA is not currently able to comment beyond 1:100? In other words, provincial CA regulations may change before the next OP update.

**Response:** *The City of Ottawa standards for flooding and impact of climate change are very progressive. If this is something the Town wishes to do, I am happy to assist but this should be considered a separate project and distinct project. It is not a straightforward undertaking and will need the RVCA involvement to map the 1:350 hazard boundary and prepare appropriate policies for consideration. There would be a need to determine what impact it may have on existing properties, develop draft policies, bring them through the public process etc... If Council agrees, an OP policy could be inserted like the following:*

*"The Town of Perth recognizes that there may be potential negative impact of climate change on increased frequency and severity of extreme weather events and the potential for increased flooding, beyond the 1:100 flood elevation. The Town will work with the RVCA to identify impacted lands, development policies and processes and procedures for development located outside of the 1:100 flood elevation and higher standards (i.e. 1:350 food elevation)."*

## **SUMMARY AND NEXT STEPS**

This report highlights the comments received on the Redlined Discussion Draft of the Town of Perth Official Plan from the First Nations, agencies and public, along with the Consultant’s response to the comments. At this time direction from Council on updating the Discussion Draft Official Plan based on comments received from the public and agencies will help the Consultant finalize the document for Council’s formal consideration in the form of an Official Plan Amendment.

Once Council adopts the pending Official Plan Amendment, the file is then forwarded to Lanark County for formal approval. It is the County Council’s decision that is appealable by agencies and property owners.

One matter Council should consider is whether the scope of the changes to the Discussion Draft represent a significant deviation from what has already been presented to the public. If Council believes the changes are relatively minor, they could proceed directly to considering the OPA. If Council believe the changes are substantive and warrant further public



review, Council could schedule a second public meeting to present the revised draft to the public, solicit their comments, make any final changes, and then proceed to OPA adoption. Consideration of this matter by Council is requested.

All of which is respectfully submitted.

Jp2g Consultants Inc.  
ENGINEERS ▪ PLANNERS ▪ PROJECT MANAGERS

A handwritten signature in black ink, appearing to read 'F. Symon', with a long, sweeping horizontal line underneath.

Forbes Symon, MCIP, RPP  
Senior Planner | Planning Services

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**End of report.**



## APPENDIX A

### First Nations & Agencies Comments

Good afternoon, Forbes,

I have reviewed the proposed Perth Official Plan Update and note that the AOO were quite involved in 2021 regarding the history and archeological chapters. I'm not sure if you were able to work with our historian Joan Holmes and Archaeologist Ken Swayze as you mention that you worked with a local elder/consultant to come up with the statement. I was wondering who the elder/consultant was.

I do however appreciate that the Town of Perth acknowledges the duty to consult with the Algonquins of Ontario in Section 6.8 Archaeological Resources. I am attaching the Algonquins of Ontario Archaeological Standards and Guidelines and would like it to be included in the Town of Perth Official Plan Update.

Kind regards,

**Jane Lagassie**

Traditional Knowledge Specialist

**Algonquins of Ontario Consultation Office**

31 Riverside Dr #101, Pembroke, ON K8A 8R6

Website: [www.tanakiwin.com](http://www.tanakiwin.com)

### **CONFIDENTIAL AND PRIVILEGED INFORMATION NOTICE**

***This e-mail, and any attachments, may contain information that is confidential, subject to copyright, or exempt from disclosure. Any unauthorized review, disclosure, retransmission, dissemination or other use of or reliance on this information may be unlawful and is strictly prohibited.***





## **Algonquins of Ontario Archaeological Standards and Guidelines**

Conducting Archaeology within the Unceded Settlement Area of the  
Algonquins of Ontario

**Algonquins of Ontario**  
**[www.tanakiwin.com](http://www.tanakiwin.com)**

Consultation Office  
31 Riverside Drive, Suite 101  
Pembroke, ON K8A 8R6  
Toll Free: 1-855-735-3759  
[www.tanakiwin.com](http://www.tanakiwin.com)







## Contents

1.0	Background on the Algonquins of Ontario .....	3
1.1	Algonquins of Ontario Values and Teachings .....	5
2.0	Orientation to the Algonquins of Ontario Archaeology Standards and Guidelines .....	6
3.0	Current Archaeological Process and Practice .....	8
3.1	Archaeological Licensing in Ontario .....	8
3.2	The Ministry's Archaeological Standards and Guidelines .....	9
3.3	Aboriginal Engagement .....	9
3.4	Archaeological Repositories .....	11
4.0	The AOO Archaeological Standards and Guidelines .....	12
4.1	The Need for AOO Archaeological Standards .....	12
4.2	The AOO Archaeological Standards .....	14
5.0	Stage 1: Background Study and Property Inspection .....	16
6.0	Stage 2: Property Assessment .....	17
7.0	Stage 3: Site-specific Assessment .....	19
8.0	Stage 4: Mitigation and Protection .....	19
9.0	Appendix A: AOO Archaeological Liaison Request Template .....	20
10.0	Appendix B: Selected Algonquin and Indigenous Resources .....	21



Municipal Planning  
To:Forbes Symon  
Fri 12/13/2024 11:43 AM

Thank you for your circulation.

Enbridge Gas does not object to the proposed application(s) however, we reserve the right to amend or remove development conditions. This response does not signify an approval for the site/development.

Please always call before you dig, see web link for additional details: <https://www.enbridgegas.com/safety/digging-safety-for-contractors>

Please continue to forward all municipal circulations and clearance letter requests electronically to [MunicipalPlanning@Enbridge.com](mailto:MunicipalPlanning@Enbridge.com).

Regards,

**Willie Cornelio** CET (he/him)  
Sr Analyst, Municipal Planning  
**Engineering**

**ENBRIDGE**  
500 Consumers Rd, North York, ON M2J1P8  
[enbridge.com](http://enbridge.com)  
**Safety. Integrity. Respect. Inclusion.**



Marika Livingston

To:Forbes Symon

Cc:Brian Stratton;Joanna Bowes;Hailey Mahon

Wed 12/18/2024 9:17 AM

Hi Forbes,

I hope you are doing well. Thank you for the opportunity to review and provide comments.

Brian and I have reviewed this for DWSP purposes, we have no concerns, except we have two small comments:

- we can't seem to find Appendix A1 in the revised OP or the original on Perth's website. Can you share that with us so we can review?
- at some time in 2025, the policies and threats managed by our Source Water Protection Plan will change, at that time the Town's OP and Zoning will have to be updated to reflect this change. It is too early to do now, but we just wanted to advise in advance.

Could you include a statement describing that our Source Protection Plan is changing to align with the 2021 Technical Rules and when it is completed and approved, the revised Source Protection Plan is the one that the Official Plan and Planning Act decisions must conform to? The *Clean Water Act* trumps the Planning Act; therefore, this is implied and will be the practice going forward, but perhaps stating the above might help tell the story? (derived from 12/18/2024 email)

Kind regards,

Marika

**Mississippi-Rideau Source Protection Region**

Rideau Valley Conservation Authority Office

3889 Rideau Valley Drive

P.O. Box 599

Manotick, ON K4M 1A5



Bousquet, Pierre (MINES)

To:Forbes Symon

Cc:LeBaron, Peter (MINES)

Wed 1/8/2025 1:30 PM

Good afternoon, Forbes,

As mentioned in the precedent communication of June 28, 2023, the planning interests of the Ministry of Mines are related to the protection of long-term mineral resource supply (Section 4.4 PPS 2024) and to the protection of human health and safety (Section 5.3 PPS 2024). The town of Perth sees low mineral potential and two Abandoned Mines Information System (AMIS) sites, which are under the Aggregate Resources Act (AMIS 03306 and AMIS 07470), administrated by the Ministry of Natural Resources and Forestry.

With that in mind, no concerns were identified in the draft regarding sections 4.4 and 5.3 of the PPS 2024 under the planning interests of the Ministry of Mines.

Ontario Geological Survey data, including Mineral Deposit Inventory (MDI), Abandoned Mines Information System (AMIS), Bedrock Geology, and Aggregate Resources mapping are available for viewing or free download on OGSEarth at <https://www.hub.geologyontario.mines.gov.on.ca/>. Mining Lands information can be obtained from the Mining Lands Administration System (MLAS) map viewer at <https://www.ontario.ca/page/mining-lands-administration-system>.

Best regards,

Pierre Bousquet, P. Geo.

Regional Land Use Geologist Northeast Region  
Resident Geologist Program  
Ontario Geological Survey  
Mines and Minerals Division  
Ministry of Mines  
Ontario Government Complex  
5520 Hwy 101 East, E-Wing  
South Porcupine, ON  
P0N 1H0

*Taking pride in strengthening Ontario, its places and its people*



Consultations

To: Forbes Symon

Fri 1/24/2025 9:37 AM

This is an automatically generated response from [consultations@metisnation.org](mailto:consultations@metisnation.org). Please do not reply to this e-mail address.

The MNO is adjusting standard work practices due to the Covid-19 outbreak and to better enable staff to work remotely. **Please note that the MNO's Lands, Resources and Consultations (LRC) Branch will no longer review hard copy consultation notices mailed to MNO offices.** The LRC Branch will review all electronic notices and process them in accordance with our standard operating procedures. All consultation notices must be sent electronically to [consultations@metisnation.org](mailto:consultations@metisnation.org).

The Métis Nation of Ontario's LRC Branch acknowledges your information notice. The MNO reserves the right to request additional information, meetings and consultations in respect of the project should the MNO deem it to be necessary.

For additional information pertaining to consulting with Ontario Métis please visit the MNO web site at: <https://www.metisnation.org/programs-and-services/lands-resources-consultations/duty-to-consult/>



TVT Planner

To:Forbes Symon

Cc:TVT CAO

Fri 1/24/2025 10:54 AM

Hi Forbes,

Thanks. They look interesting. The only comment I have is what do the red dots on the north of Perth on the Nat Heritage Systems map indicate? Couldn't see it in the legend.

Thank you,

Noelle



# LANARK COUNTY

lanarkcounty.ca

99 Christie Lake Road, Perth, ON K7H 3C6

BY EMAIL ONLY

Joanna Bowes  
Director of Development Services, Town of Perth  
jbowes@perth.ca

2025.01.24

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## Re: Comments on Perth Official Plan December 2024 Redline Draft

Joanna,

Thank you for the opportunity to review the December 2024 redline draft of the Perth Official Plan (OP) as a part of your comprehensive review.

Please find enclosed a marked-up pdf with extensive notes and comments. The points below should be read in conjunction with the mark-up and are intended to highlight some key issues and themes.

A comprehensive review is an important process that occurs infrequently. The context of Perth's growth pressures has changed since the last review. The County's in-progress Growth Management Study (GMS) indicates that Perth can expect growth in excess of historic trends and norms.

In this light, while much work was done during the last comprehensive review on the question of growth, it is critical that this update continue to position the Perth OP to proactively respond to and, importantly, accommodate growth.

To this point, I believe there is a significant opportunity for Perth to strategically review the opportunity and public interests involved in infill and redevelopment. I recommend a study be committed to in the OP that would comprehensively review this issue. It should assess opportunities and fiscal benefits, identify strategic sites, corridors, and areas, contemplate greyfield options, set ambitious targets, and recommend enabling policies. The study could result in an OP amendment, Secondary Plan(s) and/or the designation of strategic growth areas. While





the current plan touches on this topic in many ways, a comprehensive and coordinated update along with public education and consultation during the study may ideally position Perth community members and decision makers to execute on this important method of provide housing options and affordability.

In a similar fashion, key issues such as housing density targets should be reviewed in light of the County's in-progress GMS study and its preliminary findings which suggests a materially higher rate of high-density development may be required. This review should also consider projected housing market demand, land development economics and the efficient land and infrastructure and fiscal sustainability.

It would be worthwhile to review the cited '2024 Residential Lands Needs Assessment' and ensure it is consistent with the ongoing Watson's GMS being completed by the County. Depending on the adoption of the GMS and the related County OP update, these references in the Perth OP may need to change, be approval authority modified, or addressed via an OP amendment after the fact, depending on how the processes and timing line up.

Efforts should be made to provide clarity on, and pathways to implementation for, affordable housing. This would include articulating triggers for inclusion in developments of various types, scales and built forms and specific mechanism as to how it will be implemented in relation to development and redevelopment.

A review of employment areas and the new PPS policies and *Planning Act* definitions should be undertaken as they relate to the Industrial and Business Park designations.

I would recommend a distinct review be completed of the OP and *Planning Act* to ensure that those powers that are expressly permitted only where authorized by an Official Plan are contemplated in the Plan. While many are contemplated, some you may wish to review for local applicability include:

- Inter-governmental CIP grants or loans 28(7.2)
- Minor by-laws – delegation Section 39.2 of the Act in the Plan to allow for the possibility of implementation in the future? (Allows delegation of holding end temp by-laws)
- Sustainable design elements on any adjoining highway - Site Plan Control - 41(4)(e)
- Verify use of "any highway" language meets test of widening requirements for Site Plan Control - 41(9)
- Reduction in Cash in Lieu for sustainability criteria in a redevelopment - 42(6.2)
- Development Permit System - 70.2



- While included, review acquisition of land and public works conformity provisions of the Plan to ensure they reflect planned and needed infrastructure within the Plan's new horizon.

On a more administrative note, as you develop your consultation plan for the proposed OP update, please review Section 17(15) of the Planning Act and O. Reg 243/06 Subsection 2 to ensure the required information has been developed and will be provided to agencies, the public and the approval authority. For example, draft amended schedules should be made available, but which were not provided as a part of this redline exercise.

For ease of future reference, it would be best to have any redline version use a different colour for text that is relocated. Using strikethroughs for both deletion and relocation can cause reader confusion.

I would also appreciate an early understanding of how you plan to present and adopt the final amendments to the Plan by by-law. Will you develop a schedule of changes or, given the potential extensive scope of amendments, seek to adopt a redlined document?

As you advance to Council consideration of the Plan update keep in mind that Section 26(7) of the Act requires Council to declare to the approval authority that the official plan meets the requirements of clauses (1) (a), (b) and (c). A separate resolution or a statement in the adopting by-law will suffice.

Given the role of the County as the approval authority, I would appreciate a document being provided with any future draft (or record for approval) that details how the feedback of the County has been considered, any amendments made in response to it, and if no amendments are made on specific issues identified, the related planning rationale. Please note, not every note and comment requires a distinct response, simply a summary based on OP sections or key issues flagged (especially those with ties to a provincial interest). This will assist in future draft version reviews.

Sincerely,

Mike Dwyer  
Planning Manager, Lanark County

Cc: Forbes Simon, Project Consultant Planner, JP2G  
Koren Lam, Senior Planner, Lanark County





## OP Update - Draft Schedule Comments

Mike Dwyer<mdwyer@lanarkcounty.ca>

To: Joanna Bowes <jbowes@perth.ca>; Forbes Symon

Wed 3/19/2025 11:26 AM

Morning, Found some time to look over the posted draft schedules. Here are my comments:

### Schedule A:

- There is a 'thin bar' green diagonal line designation over the waste site and a block north of 7 that does not look to be in the legend. Matches unevaluated wetland in Schedule D. If no distinct land use designation in Plan, should only be on Schedule D.
- In the land to the east of the waste disposal site intended to be industrial (I assume given it is a CAZ), or should it be park/open space (I thought it was publicly accessible site with a dog park)
- Is the 'Industrial Lands' designation intended to constitute your employment area to satisfy the PPS? Employment Areas are to be designated in OPs in Settlement Areas per 2.8.2.3 of PPS. If so, this will need to be clearly articulated in the actual OP policy (that industrial lands constitute the employment area) and the permitted uses will have to align with 1(1.1) of the Act. Please see my detailed comments in the Redline Draft.
- Would it be beneficial to designate your greenfield areas 'designated growth areas' to match the PPS.
- The EP and Flood designations are difficult to differentiate where overlapping.
- It would be prudent to do a refinement exercise on the EP boundary. For example, it looks to include many residential lots in the Perthmore area. Also, it overlaps with the residential designation in many areas. If a PSW, the residential designation should not underlie it.
- Is the EP designation intended to encompass the FP lands in built areas, like downtown?
- Updates should be made is refinement of boundaries (FP, EP etc.) are agreed to as a part of the Caivan development before the schedule is finalized.
- I would encourage you to consider the potential value of a mixed-up designation for arterial roads to better facilitate ground floor commercial with residential above, or higher density residential.
- There are a number of blank/white areas that do not have any designation. All lands should have an underlying designation to direct/define appropriate land use.
- If no New Residential Area Designation planned on schedule, designation should be removed from 8.14 of Plan.
- Plan refers to Highway Commercial District, Schedule legend omits 'district' – best to match for clarity like CAD designation

- Would it be prudent to map on the 500m influence area for the waste site noted in Section 5.4C of the Plan.

#### Schedule B:

- Part of Robert Rd is shown as Arterial.
- Do you still want to show the 'new road' from Highway 7 to North St. – is back on Council's radar given Perthmore settlement? Refine location, or leave abstract?
- 5.5.3c of the Plan notes Wilson Street from Foster Street to Herriott Street as a collector. Not reflected on Schedule. (Also should Herriott to Gore then not be included?)
- New collector segment/extension of Wilson St from Highway 7 to new connection between Drummond W and 511 may not be listed in 5.5.3c of Plan.
- Also I could not make sense of what this was referring to in 5.5.3c "Drummond Street West from its intersection with a new collector road extending to County Road 511 to the terminus of Drummond"
- The schedule shows Lola Rane as a municipal road – is this correct (or will it be base don recent conversations related to the adjacent consent application)
- Colborne St potentially shown as private.
- Are Tay and Basin Lane private where they go through the Town's land/parking lot?
- Is Burchell Blvd public as shown?

#### Schedule C:

- Do you want to identify the Downtown Perth Heritage Conservation District?
- Do you want to indicate the limits of the IPZ rankings to align with SWP policies/requirements?
- Does the fill and construction line (CA Reg limit) match new authority for CA? It also looks to be highly variable in depth form FP, and not a standard setback distance. It is also not complete in linear extent – stopping short of town boundary and also does not capture areas around Perthmore where FP exists.
- Do you have any known or suspected contaminated sites. If so, they should be identified in this schedule.
- Do you intend to map wildland fire areas?

#### Schedule D:



- The red dot destination at the top of the schedule is not indicated in the legend.
- The ANSI designation is obscured by EP. Maybe remove EP, since already in Schedule A and also covered by PSW strip on Schedule D.
- 8.6.1 in Plan refers to Schedule C – should be D if plan is to have 4 schedules as drafted. Verify other references in Plan.
- 8.6.4e refers to significant woodlands and Appendix 11. Is intent to keep in a sperate appendix or bring into Schedule D?
- Would it be prudent to map the rail corridor as a connecting link of the system?

Best, Mike

**Mike Dwyer**  
Planning Manager

Lanark County  
99 Christie Lake Road  
Perth, ON K7H 3C6  
mdwyer@lanarkcounty.ca  
[www.lanarkcounty.ca](http://www.lanarkcounty.ca)

# South East Health Unit

*formerly*



January 24, 2025

Joanna Bowes  
Director of Development Services

**Re: Town of Perth Official Plan – Review and Update**

Dear Ms Bowes:

The South East Health Unit, formerly the Leeds, Grenville and Lanark District Health Unit, is pleased to provide feedback on the Town of Perth's Official Plan (OP) Review and Update. Communities where people live, work, learn, and play significantly influence health and well-being. We commend the Town of Perth for its efforts to acknowledge Indigenous history and relationship to the land and develop and implement policies that promote and protect human, environmental, and economic health. The Town of Perth's Official Plan includes various sections that effectively advance public health objectives. These include policies aimed at:

- Encouraging sustainable development, use patterns and active transportation.
- Promoting mixed-use developments with proximity to essential services and amenities.
- Preserving natural environments and cultural heritage.
- Integrating accessibility into planning and development processes.
- The inclusion of supportive environments related to food including food systems, facilities and opportunities to store, access, grow, learn about and prepare food.
- Addressing climate change impacts and fostering resilience through sustainable practices.

Below, we offer suggestions for further strengthening the Official Plan. These comments are organized by section and include **bolded** recommendations for clarity. Each suggestion is accompanied by a rationale and, where appropriate, references for additional context.

Hastings Prince Edward Public Health  
179 North Park St.  
Belleville, Ontario K8P 4P1  
613-966-5500 | 1-800-267-2803  
Fax: 613-966-9418

KFL&A Public Health  
221 Portsmouth Ave.  
Kingston, Ontario K7M 1V5  
613-549-1232 | 1-800-267-7875  
Fax: 613-549-7896

Leeds, Grenville & Lanark  
District Health Unit  
458 Laurier Blvd.  
Brockville, Ontario K6V 7A3  
613-345-5685  
Fax: 613-345-2879

## Section 1.4 – A development Strategy for Perth

1. To provide for a compact and energy efficient land use pattern that optimizes the use of available infrastructure (roads, water, sewer, waste disposal) and public service facilities (schools, hospitals, recreation and cultural facilities, fire and police) and which utilizes densities and development standards which are cost effective **and support active transportation.**

**Rationale:** Active transportation reduces greenhouse gas emissions and increases physical activity, promoting overall health. Designing compact urban areas that encourage walking and cycling reduces reliance on private vehicles, improving air quality and decreasing the risk of chronic diseases (Litman, 2013; Canadian Partnership Against Cancer, 2025).

2. To manage growth while at the same time maintaining a healthy and livable urban environment. Residential neighbourhood's will be conserved or developed keeping in mind a sense of human scale, character, safe streets and public spaces, and the provision of **equitable access to amenities**. Access to public buildings and facilities shall be designed or upgraded to accommodate the needs of persons with disabilities or special needs.

**Rationale:** Ensuring equitable access to amenities allows all community members to benefit from urban planning, regardless of socioeconomic status. This approach significantly enhances mental health, physical well-being, and social cohesion (Mwoka et al., 2021). Emphasizing diversity, equity, and inclusion can enrich the community's social fabric and stimulate economic growth. This attracts talent, fosters innovation, and encourages investment. A welcoming and inclusive environment improves the overall quality of life. It contributes to residents' mental and physical well-being, making the community more appealing to individuals and businesses.

3. To sustain a healthy economy by providing opportunities for economic development e.g. commercial development in the Downtown and on the Highway 7 corridor which complements each other, by providing a frame work for Home Based Businesses and by sustaining the industrial base **and green business initiatives.**

**Rationale:** Promoting green businesses aligns with sustainable economic development goals by reducing environmental damage and promoting health equity, particularly in addressing environmental justice issues within urban areas (Lett et al., 2022; Henderson, 2010). Furthermore, adopting inclusive practices and cultivating welcoming, diverse communities can enhance local economic sustainability. This approach can attract a wider talent pool, retain employees, and establish a reputation for equity and inclusivity. Ultimately, these practices contribute to community resilience, innovation, and long-term economic growth (CCUNESCO, 2021).

4. To achieve an appropriate supply of housing, the Town's housing strategy is to provide an adequate and continuous inventory of serviced land for the development of a full range of housing types and densities; to set out specific targets for affordable housing; and to use a portfolio of planning tools to facilitate residential development (e.g. community improvement alternate development standards, zoning, intensification) **and prioritize universal accessibility.**

**Rationale:** Prioritizing universal accessibility ensures housing accommodates people of all abilities, fostering inclusivity and reducing health disparities. Accessible housing improves independence and aligns with equitable urban development (Kapsalis et al., 2024; Mwoka et al., 2021).



5. To sustain lifestyles and activities commensurate with a 'small town atmosphere' while providing opportunities for community development **and fostering social connectedness**.

**Rationale:** Fostering social connections dramatically improves physical and mental health, enhances quality of life, and increases longevity by reducing social isolation and loneliness, which can significantly harm overall health. Developing a sense of community contributes to well-being and helps maintain the charm and resilience of a small-town atmosphere (Mwoka et al., 2021; WHO, 2025).

6. To conserve the rich cultural heritage and archaeological resources of the community as a sustaining element of the economic base and as an integral component to the theme of community development **and promote public engagement**.

**Rationale:** Promoting public engagement in heritage conservation strengthens community identity, supports mental well-being, and boosts local economies through tourism and cultural pride (Henderson, 2010; Mwoka et al., 2021).

7. To conserve the attributes of the natural physical environment such as wetlands, wildlife communities, trees and vegetation, to conserve the water quality of surface and groundwater systems, to maintain river corridors in their natural state wherever possible, and mitigate the impacts of climate change **by enhancing ecosystem services**.

**Rationale:** Enhancing ecosystem services, such as natural flood mitigation and air quality improvement, supports public health and strengthens resilience to climate change impacts (Campbell-Lendrum & Corvalán, 2007; Wilson & Xiao, 2023).

8. To maintain the well-being of the "main streets of the central area and the highway commercial corridor". Land use decisions will be cognizant of the need to create or preserve 'people places', to reduce the need and impact of the automobile and increase the opportunities for pedestrian travel within and through the community **with the inclusion of accessible design standards**.

**Rationale:** Accessible design standards ensure inclusivity for all individuals, including those with disabilities, improving mobility and fostering equity in public spaces (Kapsalis et al., 2024; Canadian Partnership Against Cancer, 2025).

### **Section 3.1.1 – Perth Settlement Area Expansion**

ii. That the infrastructure and public service facilities **incorporate climate-resilient designs, are planned or available suitable for the development over the long term, are financial viable over their life cycle, protect public health and safety and the natural environment**.

**Rationale:** Incorporating climate-resilient designs ensures that future developments can withstand the impacts of climate change, such as extreme weather events, flooding, and heatwaves. This protects public health, minimizes long-term costs, and ensures sustainable infrastructure use (Campbell-Lendrum & Corvalán, 2007; Das et al., 2024).

Ensuring resilience in settlement expansions is critical to maintaining environmental integrity and community well-being over the planning horizon.

### **Section 3.2 – Housing**

- A) The land available for housing supply has the flexibility to provide substantial variety in the mix and density of housing types (i.e., singles, two-unit dwellings, town houses, apartments) **and include universal accessibility standards.**

**Rationale:** Ensuring universal accessibility standards in housing promotes inclusivity and allows individuals with disabilities, seniors, and families to live comfortably and safely. Accessible housing aligns with equity principles and addresses social determinants of health, supporting community well-being (Kapsalis et al., 2024; Mwoka et al., 2021).

- B) Monitoring the demand-supply ratio will be undertaken as part of the regular five year review of this plan to ensure that there is a sufficient supply of land and lots available for the full range of residential development needs at all times, and to ensure that the phasing and development of residential areas is coordinated and integrated with planning for infrastructure and public service facilities **that incorporate sustainability measures.** This is essential, since the current land supply may be insufficient-if the high estimate proves to be conservative later in the planning period. **Using a sustainable development approach also enhances residential land's long- term viability and resilience also helping to maintain current supply..**

**Rationale:** Incorporating sustainability measures ensures that housing developments minimize their environmental impact, reduce energy use, and enhance resilience to climate change. This approach supports long-term community health and reduces infrastructure strain (Das et al., 2024; Campbell-Lendrum & Corvalán, 2007).

- E) High Density = 10 to 15% of future residential development **with transit-oriented design principles.**

**Rationale:** Integrating transit-oriented design principles ensures that housing developments are close to accessible transit options, including active transportation routes and essential services. This approach reduces car dependency, lowers emissions, and encourages physical activity (Litman, 2013; Canadian Partnership Against Cancer, 2025).

### **Section 3.3 – Economic Base**

The Plan establishes and protects lands for employment growth through a combination of mixed-use development, commercial and industrial areas **while integrating green business initiatives.** Principles of urban design have been built into and support active transportation and connectivity between activity areas such as the downtown, public spaces, recreation and parks, residential neighbourhoods and public service facilities. Efforts will be made to ensure employment lands are investment ready and have sufficient reserve infrastructure capacity (sanitary and water services) to support employment growth. Specific attention will be paid to ensuring a robust and modern telecommunication infrastructure to support **diverse** business development and growth and **expand equitable access to remote work opportunities.** **By creating an inclusive and welcoming environment communities can attract talent, foster innovation, and enhance economic resilience, which benefits businesses and society.**

**Rationale:** Green business initiatives promote environmentally sustainable practices, reduce pollution, and align with the global shift toward a greener economy. This approach protects the environment and attracts eco-conscious and diverse businesses, fostering innovation and inclusivity while supporting long-term economic and environmental health (Lett et al., 2022; Das et al., 2024). Creating an inclusive and welcoming environment allows communities to attract skilled individuals, drive innovation, and build economic resilience, which benefits both businesses and society (Machado et al., 2023). Furthermore, expanding equitable access to remote work opportunities enables all residents, including those in rural or underserved areas, to participate in job growth. This transition reduces commuting needs, lowers greenhouse gas emissions, enhances work-life balance, and improves public health (Mwoka et al., 2021; Campbell-Lendrum & Corvalán, 2007).

### **Section 3.4 – Infrastructure And Public Service Facilities**

- A) The community is well endowed with municipal infrastructure (roads, water, sewer, waste management systems, communications and gas and power utilities) and public service facilities (schools, health care facilities, police and fire protection and cultural services). Many of these facilities service a catchment area larger than the Town. With a changing demographic profile, continued growth, and the impacts of climate change, there will be a need to expand infrastructure **and public service facilities using climate-resilient designs**, while continuing to maintain or rehabilitate existing facilities.

**Rationale:** Integrating climate-resilient infrastructure designs helps ensure long-term functionality amidst extreme weather events, flooding, and other climate impacts, which supports sustainable growth and public health (Campbell-Lendrum & Corvalán, 2007; Das et al., 2024).

- D) Storm water management will be an essential component to future development in meeting provincial water quality objectives. Options for sustainable management of storm-water and drainage, resilient to climate change, will be encouraged in new development and ~~investigated~~ **recommended for** substantive redevelopment projects.

**Rationale:** Requiring sustainable stormwater management for redevelopment ensures that all projects, not just new developments, adhere to high standards for water quality and climate resilience. This approach minimizes risks associated with flooding and water contamination, promotes ecosystem health, and protects public health from waterborne diseases (Campbell-Lendrum & Corvalán, 2007; Wilson & Xiao, 2023).

- K) The attributes of a healthy community are a focus of the Plan through enhanced policies for urban design, active transportation, provision for trails, public parks and public places, conservation of the natural environment and the development based on compact, efficient and fully serviced land use patterns **that promote social equity and universal accessibility**.

**Rationale:** Promoting social equity and universal accessibility ensures that community resources, such as parks, trails, and public spaces, are inclusive for people of all abilities and socioeconomic backgrounds. This fosters a sense of belonging, reduces health disparities, and supports physical and mental well-being (Kapsalis et al., 2024; Mwoka et al., 2021).

### **Section 3.5 – Heritage Conservation**

The image of Perth is invariably linked to its heritage and its history. The Plan not only provides for the conservation of built heritage resources, cultural heritage landscapes and archeological resources in the community but articulates a heritage character statement as the basis for the establishment of Heritage Conservation Districts. This

statement underscores the importance of heritage to the economic base, visual aesthetics and landscapes of the community **and promotes community engagement in heritage preservation**. Heritage is a theme which threads its way throughout the Plan since it is an integral component of community development and redevelopment. Heritage policies also take into consideration linkages within the region such as the Tay Canal and Corridor which are part of the Rideau Canal National Historic Site and UNESCO World Heritage Site.

**Rationale:** Engaging the community in heritage preservation strengthens local identity, fosters social cohesion, and enhances mental well-being by creating a shared sense of pride and connection to history (Henderson, 2010; Mwoka et al., 2021).

### **Section 3.6 – Natural Heritage Features**

With the assistance of the Ministry of Natural Resources and Forestry (MNRF) and the Rideau Valley Conservation Authority, natural heritage features have been identified and mapped. The Plan establishes procedures for undertaking an Impact Assessment to evaluate the impacts of proposed development on such features, **and encourages habitat restoration efforts**, most notably, the Perth Long Swamp and the Grant's Creek Wetland. Conservation of the natural environment is key to conserving biodiversity, and ensuring connectivity in the natural heritage system within Perth and extending to river and wetland systems outside of the Town's borders.

**Rationale:** Encouraging habitat restoration ensures biodiversity is maintained, enhances ecosystem services such as water filtration and flood mitigation, and provides recreational and mental health benefits to the community (Campbell-Lendrum & Corvalán, 2007; Wilson & Xiao, 2023).

### **Section 3.7 – Community Improvement**

Community improvement is considered vital to the revitalization of the Downtown and industrial areas of the town. The Plan carries forth the relevant policies of the previous Plan in providing the enabling authority for revitalization of services and the building stock **and prioritizing inclusive, sustainable and accessible designs in redevelopment projects. Incorporating sustainability into community enhancements supports environmental goals, strengthens economic resilience, and improves social well-being, making the area more attractive to residents, businesses, and visitors.**

**Rationale:** Focusing on inclusivity and accessibility in redevelopment projects helps reduce social barriers, promote equity, and ensure that public spaces meet the needs of diverse populations. This approach fosters community cohesion and supports public health while aligning with sustainability principles by creating long-term, adaptable spaces that will benefit future generations (Kapsalis et al., 2024; Canadian Partnership Against Cancer, 2025; Scheirer & Dearing, 2011). Furthermore, these efforts comply with universal accessibility standards, enhancing the usability and appeal of public spaces for all residents and visitors.

### **Section 3.8 – Public Health and Safety**

Natural and human made hazards or conditions exist within the community such as flood plains and contaminated sites. The Plan provides policies to ensure safe development from natural and human-made hazards as impacted by climate change. The basis of this Plan strives to plan for a livable community which is capable of sustaining the impacts of climate change **including the use of nature-based solutions as part of a broader approach**. This requires the Town to ensure resiliency and utilization of sustainable building practices and materials. The Town's Climate Change Action Plan will assist staff and Council as they plan for and minimize the impacts of climate change.

**Rationale:** Nature-based solutions, such as green roofs and wetlands, mitigate climate risks, improve air and water quality, and enhance public health outcomes while reducing reliance on costly infrastructure (Campbell-Lendrum & Corvalán, 2007; Das et al., 2024). Creating welcoming and inclusive communities that embrace equity, diversity, and inclusion attracts a diverse population, enriches the social connection, and drives innovation and growth (Moore & Piddini, 2023).

### **Section 3.10 – Healthy and Sustainable Communities**

Building a **welcoming**, strong, healthy, **diverse** and sustainable community is a key objective of the Official Plan and the basis for good land use planning over the long-term. Section 5.9 sets out an extensive menu of policies designed to promote energy conservation, sensitive urban design and the development of a high quality urban environment. Perth has been designed as a live/work/play community and the compact urban character based on a grid pattern facilitates easy movement of people and goods. The urban form lends itself to active transportation with easy access to shopping, employment, educational, social and recreational facilities and activities **while prioritizing universal accessibility and equitable resource distribution**.

Section 8.7 of this Plan includes policies recommended by the Town's Recreation Master Plan to promote a healthy community. During the life of this Plan, it is anticipated that the Town of Perth, potentially in collaboration with neighbouring municipalities, will plan for the construction of a new multi-use recreation facility to serve the **diverse** needs of the residents of Perth and the surrounding region **while incorporating inclusive design principles**.

The Town has established a Parkland Cash-in-Lieu By-law to guide the future acquisition of new parkland. The By-law outlines circumstances where conveyance of parkland is not acceptable and where cash-in-lieu of parkland will be considered **with a focus on creating interconnected green spaces**.

**Rationale:** Universal accessibility and equitable resource distribution ensure that all residents, including those with disabilities and individuals in underserved areas, can equally benefit from urban development. This approach helps reduce disparities, fosters diversity, and promotes social cohesion (Kapsalis et al., 2024; Mwoka et al., 2021). Inclusive design principles for recreational facilities allow participation from people of all abilities, encouraging physical activity, supporting mental health, and facilitating social interaction. This aligns with public health priorities and equity goals (Canadian Partnership Against Cancer, 2025; Kapsalis et al., 2024). Interconnected green spaces enhance biodiversity, reduce urban heat, and provide accessible recreational opportunities. These spaces support physical and mental health while promoting environmental sustainability (Wilson & Xiao, 2023; Das et al., 2024). Creating welcoming and inclusive

communities that embrace equity, diversity, and inclusion attracts a diverse population, enriches the social connection, and drives innovation and growth (Moore & Piddini, 2023).

#### **Section 4.2 – Mission Statement**

The mission statement is intended to underscore the strategy for economic development. This statement of Council is:

"To advance local economic development and tourism through activities and actions which will help retain existing enterprise, organizations and services as well as encourage **diverse, sustainable and inclusive** economic growth."

**Rationale:** Incorporating sustainability is essential for balancing economic growth with environmental integrity, which supports long-term resilience and public health (Das et al., 2024; Campbell-Lendrum & Corvalán, 2007). Emphasizing inclusivity provides equitable access to economic opportunities, promoting social cohesion and reducing disparities (Lett et al., 2022; Mwoka et al., 2021). Furthermore, fostering welcoming and diverse communities enriches social connections, attracts talent, and drives innovation, laying a strong foundation for economic growth and community well-being (Moore & Piddini, 2023).

#### **Section 4.3 – Beliefs**

Council subscribes to a number of beliefs which are integral to the formulation of an economic strategy, namely:

- that the local economy can be enhanced through strategic planning;
- maintaining a community development office will improve the profile of Perth and area as a desirable place to do business;
- establishing employment lands as “investment ready” assists new growth and development
- marketing and promotion is critical;
- partnering with other organizations and communities can increase the opportunities for economic development, and
- training is important to job retention.
  - **prioritizing sustainability, diversity, and accessibility fosters long-term economic resilience and inclusivity.**

**Rationale:** Sustainability ensures economic growth is aligned with environmental stewardship, reducing operational risks and fostering resilience to climate change (Das et al., 2024; Campbell-Lendrum & Corvalán, 2007). Accessibility ensures that economic opportunities are inclusive, promoting equity and enabling diverse participation in the local economy (Kapsalis et al., 2024; Lett et al., 2022).

#### **Section 5.4 – Waste Management**

A) The existing active site located in the south end of Perth (as shown on Schedule 'A' - Land Use Plan) shall only be operated, expanded or closed in accordance with current provincial environmental standards and approvals under The Environmental Protection Act. This site is intended to be used to its optimum potential capacity under the

applicable Environmental Compliance Approval as issued by the province from time to time. The Town is presently investigating options for extending the life of its site, **including enhanced waste diversion strategies such as composting and recycling initiatives**. Alternatives for managing the Town's waste will be determined at the time a decommissioning plan is considered.

C) A 500 m (1,640 ft.) influence area or a separation distance as otherwise determined through a technical study, will be used when determining the impact of a waste disposal site on adjacent land uses. The Technical study will address the following: contamination by leachate, surface runoff, ground settlement, visual impact, soil contamination and hazardous waste, **waste-to-energy opportunities**, and landfill generated gasses. The study will be used when determining the impact of a waste disposal site on adjacent uses.

**Rationale:** Enhanced waste diversion and recycling initiatives help reduce reliance on landfills, minimize environmental pollution, and align with provincial ecological goals. These strategies also improve public health by decreasing exposure to harmful waste byproducts (Das et al., 2024; Litman, 2013). Composting is an effective waste diversion method that extends the lifespan of landfills, produces cost-saving compost for municipal use, and supports sustainable land management, aligning with environmental and economic priorities. Furthermore, exploring waste-to-energy options in a technical study presents a sustainable approach to waste management by generating renewable energy, decreasing dependence on non-renewable resources, and conforming to modern waste management practices (Campbell-Lendrum & Corvalán, 2007; Wilson & Xiao, 2023).

## **Section 5.5 – Transportation**

1. The scale and design of sidewalks, roads, and street networks should support a variety of transportation modes such as walking, cycling, motorized vehicles, **and prioritize accessibility for individuals with disabilities**.

3. Public transportation corridors will be designed in accordance with their intended function to provide or improve: accessible sidewalks, pedestrian level streetlighting, public seating, tree plantings, cycling and pedestrian paths, traffic calming features, **cycling supports (i.e., secure bike parking, repair stations)**, textured right-of-ways and guiding signage and visual pathways and public art (i.e. complete streets)

**Rationale:** Ensuring transportation infrastructure is accessible supports inclusivity and allows individuals with disabilities to travel safely and independently, promoting equity in mobility (Kapsalis et al., 2024; Litman, 2013). Providing bike parking and repair stations encourages cycling by addressing practical concerns, improving convenience, and fostering a cycling-friendly culture (Canadian Partnership Against Cancer, 2025; Litman, 2013).

### **Section 5.5.1 – Provincial Highway**

B) new developments with frontage on a municipal road, shall obtain its access connection from that municipal road. An access connection generally will not be permitted to the highway for a lot with municipal road frontage, unless internal access to the total holding is impractical due to topographical or physical constraints or it can be demonstrated that access from the public road would be unsafe. **Developments should also integrate sustainable design measures to adapt to climate change and mitigate their environmental impact on the surrounding area.**



**Rationale:** Incorporating sustainable design features, such as permeable surfaces for parking areas and green roofs for buildings, helps reduce runoff and air pollution, thereby, minimizing environmental harm. These practices also contribute to climate change adaptation and mitigation by managing the impacts of extreme weather, enhancing energy efficiency, and lowering greenhouse gas emissions. This approach aligns with contemporary development practices and public health objectives (Das et al., 2024; Litman, 2013).

#### **Section 5.5.7 – Sidewalks**

A) Sidewalks constructed to an appropriate standard shall **prioritize universal accessibility and pedestrian safety and may** be constructed on one side for any local road or collector and on two sides for any arterial road (subject to the availability of funds). In general, sidewalks are not required on residential streets such as a cul-de-sac or local roads with limited potential for through traffic.

B) The planning of public streets and new development shall evaluate methods to encourage and meet the needs of pedestrian and non-motorized movement including but not limited to cycling. This shall include continuous linkages to or between residential neighbourhoods, shopping areas, institutional uses, parks and open space areas; employment areas and arterial/collector roads. **Additionally, sidewalks and pathways could incorporate climate adaptation measures, such as reducing heat islands, managing floods, and addressing extreme weather risks, to enhance resilience and safety.**

**Rationale:** Accessibility ensures sidewalks are usable by people of all abilities, fostering inclusivity and equity. Pedestrian safety measures, such as clear pathways and curb ramps, reduce accidents and improve community walkability (Kapsalis et al., 2024; Litman, 2013). Shaded sidewalks increase pedestrian comfort, encourage walking in extreme heat, and promote physical activity. Materials like permeable pavements and greenery reduce heat retention and contribute to cleaner air by filtering pollutants (Manisalidis et al., 2020; Green et al., 2021).

#### **Section 5.5.9 – Recreational Trails**

Council may develop a system of recreational trails to be integrated with the road network e.g. reserve lane or boulevard for bikeway or parks and open space system. The trail system should be linked with the Rideau Trail and should take advantage of the linear open space along the Tay River/Canal corridor. Opportunities to access the Tay River/Canal should be advanced through the recreational trail system. Construction standards will be designed to ensure the safety of users **with priority given to non-motorized users and universal accessibility particularly when** integrated with motorized vehicles.

**Rationale:** Prioritizing non-motorized users, such as pedestrians and cyclists, promotes active transportation, which has been linked to improved physical and mental health outcomes. Universal accessibility ensures that trails are usable by people of all abilities, fostering inclusivity and reducing barriers to recreation (Green et al., 2021; Canadian Partnership Against Cancer, 2025). Ensuring safe integration with motorized vehicles reduces the risk of accidents, supporting both safety and usability for all trail users (Litman, 2013).

### **Section 5.5.11 – Access to Public Roads**

A) The primary access to development lands is considered to be the principal access to a site used by occupants of a development on a daily basis. Primary access will be connected to a thoroughfare that has a minimum 9 m width **and is designed to accommodate universal accessibility and pedestrian safety.**

F) All development proposals shall be required to submit plans for streets, emergency access routes, second public access and emergency access gates or bollards are to be submitted to the Perth Fire Services for review and approval prior to the start of any projects. Consideration may be given to the need to modify existing emergency access routes, second public access or fire lanes. Each application will be assessed individually and is not to be viewed as a precedent setting or as an industry standard. **Emergency access routes shall incorporate climate-resilient materials and designs to ensure operational reliability in extreme weather conditions.**

**Rationale:** Ensuring accessibility and pedestrian safety enhances the usability of primary access points for all community members, including those with disabilities, while reducing accident risks. This aligns with inclusive design principles and safety standards (Kapsalis et al., 2024; Litman, 2013). Climate-resilient materials, such as permeable pavements or reinforced surfaces, ensure access routes remain functional during floods, extreme heat, or other weather events, supporting public safety and emergency response capabilities (Campbell-Lendrum & Corvalán, 2007; Vilcins et al., 2024).

### **Section 5.9.1 – Objectives for Climate Change, Energy Efficiency/Conservation and Community Sustainability**

A) The intent of this Plan is to create a community whose land use planning decisions result in well managed growth which is: energy efficient, generates less waste, have the potential to generate energy, **supports renewable energy sources**, and is designed to be environmentally and fiscally sustainable. A primary objective of the Town's planning review and approval processes will be to maintain and preferably enhance the quality of the built and human managed environment and the natural environment.

C) Individuals and representatives of the development industry when filing planning applications will be expected to demonstrate how their development proposals have taken into account the applicable principles of this Plan and the Climate Change Action Plan with regard to mitigation and adaptation, community sustainability, energy efficiency/conservation, energy production, **climate-resilient design**, landscaping/tree planting and environmental protection.

D) The underlying objective for energy and resource efficiency is to minimize the consumption of non- renewable energy sources, **maximize the use of renewable energy systems**, reuse and recycle manufactured or human- made materials and to reduce the amount of waste generated by individuals, households, businesses and institutions. The extent to which energy may be saved will depend on an integrated approach which involves municipal planning approvals, building and site design, consumer behavior and lifestyle changes. The municipality in playing a leadership role will influence change in the pattern of energy consumption and efficiency through pre-consultation, through ongoing grant, refund and incentive programs that encourage energy and resource efficient building components and designs, and by providing information that influences the decisions made during the design and development process.

**Additionally, grant, refund, and incentive programs will encourage energy-efficient designs while raising awareness and promoting integrated approaches to support sustainable practices in planning, design, and daily behaviours.**

E) The underlying objective for community sustainability is to support and approve development which meets the needs of the present without compromising the ability of the community to meet its future needs. Sustainable development is a process of managing change which integrates human needs and lifestyle interests with the need to conserve, restore or improve the natural and human managed environment. Land use decisions will include sustainable design measures for transportation, infrastructure, energy systems, waste management and the use of natural resources. The objective for community sustainability is also intended to be adaptive to innovative design and new technologies that support the long term environmental and economic health of the municipality **and enhance biodiversity and ecosystem services.**

**Rationale:** Highlighting renewable energy emphasizes a shift toward sustainable energy systems that reduce greenhouse gas emissions and dependence on fossil fuels, aligning with global climate action goals (Campbell-Lendrum & Corvalán, 2007; Manisalidis et al., 2020). Requiring climate-resilient designs ensures developments can withstand extreme weather events, enhancing long-term sustainability and minimizing risks to public safety and infrastructure (Vilcins et al., 2024; Das et al., 2024). Incorporating renewable energy systems like solar and wind reduces operational costs and environmental impact, promoting energy independence and community resilience (Green et al., 2021; Litman, 2013). Supporting biodiversity improves ecosystem resilience, enhances air and water quality, and provides recreational and aesthetic benefits to the community (Wilson & Xiao, 2023; Das et al., 2024).

### **Section 5.9.3 – Principles for Community Sustainability**

i) Initiating lifecycle costing, inclusive of operational costs, repair costs, durability and recyclable content to avoid or minimize negative impacts on the natural environment over the life cycle of a building, infrastructure or site development, **while incorporating climate-resilient materials and practices**, achieving the highest possible beneficial effect and restoration or reinstatement of the natural environment.

iii) Conserving and, wherever feasible, enhancing and improving the quality of surface and groundwater sources and municipal drinking water supplies, **with regular monitoring and public reporting on water quality indicators.**

v) Reducing the consumption of water resources through low-use water fixtures, reuse of grey water/wastewater, harvesting and recycling rainwater, use of swales, **increasing the use of permeable surfaces**, and using low water demand and drought resistant plants for landscaping etc.

xi) Maintaining a positive **and welcoming** visual aesthetic in the downtown and through all of the neighbourhoods and commercial areas of the community through such measures as community improvement plans, design guidelines, beautification programs, regular street and boulevard cleaning and maintenance, consistent signage, upholding property standards, **supporting public art installations**, animal and waste control programs.

**Rationale:** Climate-resilient materials enhance the durability of buildings and infrastructure, reducing vulnerabilities to extreme weather and minimizing environmental impacts over time (Campbell-Lendrum & Corvalán, 2007; Vilcins et al., 2024). Transparent monitoring and reporting ensure accountability in protecting water resources and engage the public in sustainability efforts, supporting long-term health outcomes (Manisalidis et al., 2020; Wilson & Xiao, 2023). Permeable surfaces help manage stormwater, reduce urban heat islands, and improve water infiltration, supporting ecological health and reducing infrastructure strain (Das et al., 2024; Green et al., 2021). Public art fosters community identity, improves mental well-being, and enhances aesthetic appeal, aligning with community improvement and sustainability goals (Mwoka et al., 2021; Henderson, 2010).

## **Section 6.1 – Statement Of Purpose**

To provide the Town of Perth with the appropriate mechanisms **and community engagement** for the conservation of the Town’s heritage resources including built heritage resources, cultural heritage landscapes, and known or potential archaeological resources, for the benefit of the community and posterity, by identifying, recognizing, protecting, improving and managing those resources.

**Rationale:** Engaging the community in heritage conservation fosters a sense of ownership, strengthens cultural identity, and encourages local stewardship of heritage resources. This approach also supports public education and broader participation in preservation efforts, ensuring long-term sustainability (Henderson, 2010; Mwoka et al., 2021).

## **Section 6.2 – Goal Statement**

To preserve Perth’s built, cultural, and natural resources while ensuring its growth and economic prosperity, **promoting sustainability and inclusivity**, and to establish the conservation of Perth’s heritage resources as a primary element in the planned management of change; and to use the protection of Perth’s heritage resources as a goal of planning for land use and economic development.

**Rationale:** Incorporating sustainability ensures that growth and conservation efforts balance environmental protection and resource efficiency. Inclusivity ensures that all community members can benefit from and contribute to heritage conservation efforts, fostering social equity and cohesion (Das et al., 2024; Mwoka et al., 2021).

## **Section 6.3 – Objectives**

A) To provide Perth with the necessary tools to, identify, conserve and enhance its heritage resources **while promoting community involvement in preservation efforts;**

D) To integrate **accessible and inclusive** conservation of Perth’s heritage resources into the Town’s planning and development activities.

H) To celebrate the founding of Perth in a manner that highlights the heritage character of the Town and serves to renew the community's awareness and appreciation of heritage resources from all periods of the Town’s history, including pre-colonial history, acknowledging Indigenous heritage and contributions.

**Rationale:** Engaging the community fosters ownership, pride, and broader participation in preserving heritage resources. Community involvement also enhances public education about heritage conservation (Henderson, 2010; Mwoka et al., 2021). Integrating accessibility ensures heritage sites are usable by people of all abilities, fostering equity in conservation efforts. Inclusivity ensures that diverse heritage narratives are preserved and valued (Kapsalis et al., 2024; Lett et al., 2022). Recognizing Indigenous heritage promotes reconciliation, honours pre-colonial history, and enriches the cultural narrative of Perth. This aligns with inclusive heritage conservation practices (Mwoka et al., 2021; Canadian Partnership Against Cancer, 2025).

## Section 7.1 – Introduction

Natural and human-made hazards are conditions which may affect public health and safety. In the Planning Area, these include flood prone lands, contaminated sites and noise and vibration. Some of these conditions exist in the natural environment while others are human-made. The intent of the Plan is to ensure that where development occurs, it does not become a threat to public health and safety **while incorporating climate resilience and mitigation measures**.

**Rationale:** Implementing climate-resilient measures, such as flood management systems and infrastructure designed to withstand extreme weather, reduces risks to public health and safety. By prioritizing adaptation strategies that mitigate climate impacts—like green infrastructure that lowers emissions while managing flooding—it can enhance long-term resilience. This approach aligns with modern best practices for addressing natural and human-made hazards in an evolving climate (Campbell-Lendrum & Corvalán, 2007; Vilcins et al., 2024).

## Section 7.6 – Wildland Fire

Development shall generally be directed to areas outside of lands that are unsafe due to the presence of hazardous forest types for wildland fire. However, development may be permitted in lands with hazardous forest types where the risk is mitigated in accordance with Wildland Fire assessment plan and **climate resilient and sustainable fire mitigation practices** and standards as identified by the province

Wildland Fire mitigation measures shall not be permitted in provincially significant wetlands. Wildland fire mitigation measures shall not be permitted in significant woodlands, significant valleylands, significant wildlife habitat and significant areas of natural and scientific interest, unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions. **Alternative mitigation measures will be explored to minimize environmental impact.**

**Rationale:** Incorporating climate-resilient and sustainable practices, such as fire-resistant building materials and strategic forest management, reduces the risk of wildland fires while supporting long-term environmental sustainability (Campbell-Lendrum & Corvalán, 2007; Vilcins et al., 2024). Exploring alternative mitigation measures ensures that fire safety efforts do not unnecessarily harm critical ecosystems, balancing safety with conservation goals (Das et al., 2024; Wilson & Xiao, 2023). Creating welcoming and inclusive communities that embrace equity, diversity, and inclusion attracts a diverse population, enriches the social connection, and drives innovation and growth (Moore & Piddini, 2023).

### Section 8.1.3.10 – Residential Design Principles

Council recognizes the importance of planning communities which are **welcoming, inclusive**, safe, functional and have a sense of human scale. The image of Perth as a community with a high quality of life, a 'small town atmosphere' and livable residential neighbourhoods is intended to be sustained by having regard for the following residential principles in the review of residential development or redevelopment projects.

**Rationale:** Building welcoming and inclusive communities that prioritize equity, diversity, and inclusion attracts a wide range of individuals, strengthens social connections, and fosters innovation and growth (Moore & Piddini, 2023). Moreover, fostering diversity in residential developments helps to create vibrant, inclusive communities that attract a variety of talents and perspectives, thereby, enhancing social cohesion and economic resilience (Moore & Piddini, 2023)

### Section 8.2.3 – Urban Design Guidelines

- Landscaping for aesthetics, buffering and water and energy conservation, **prioritizing native and drought-resistant plants**;
- Safety and accessibility for pedestrians, cyclists and persons with disabilities through measures for active transportation **and universal design**;
- Energy conservation and sustainable design, including minimizing hard surfaces, **and incorporating green infrastructure, such as bioswales and permeable pavements**.

**Rationale:** Using native and drought-resistant plants reduces water consumption, enhances biodiversity, and improves resilience to climate change, aligning with sustainability goals (Das et al., 2024; Wilson & Xiao, 2023). Ensuring universal design principles improves accessibility for all users, particularly those with disabilities, and aligns with equity-focused urban planning (Kapsalis et al., 2024; Canadian Partnership Against Cancer, 2025). Green infrastructure supports stormwater management, reduces urban heat islands, and enhances the environmental performance of urban developments (Campbell-Lendrum & Corvalán, 2007; Manisalidis et al., 2020).

### Section 8.2.4.5 – Residential Uses in Upper Storeys

A) Goal: to encourage, wherever possible, an increase in the number of residential units within the Central Area District through the redevelopment or rehabilitation of upper storeys or underutilized floor area of existing buildings, **while ensuring accessibility and energy-efficient upgrades** and avoiding a loss of main-floor commercial space or a net reduction of commercial floor space currently in use or with a recent history of use.

B) Function: The Central Area District should function as a place to live, work and play. It is the intent of the Plan to encourage residential development within the Central Area District through redevelopment or rehabilitation of upper storeys in commercial buildings, intensified use of existing residential buildings, new residential apartments and the repurposing of institutional buildings where appropriate and protection of heritage and architectural values is assured. A strong **diverse** residential component strengthens the vitality of the Central Area District, and provides added support for downtown retailers, service providers and cultural and entertainment establishments, **and supports sustainability through compact urban living**. A strong residential component also increases the safety and vitality of the Central Area District day and night.

**Rationale:** Promoting accessibility in redeveloped residential units supports principles of inclusivity and helps create equitable housing opportunities. Incorporating energy-efficient upgrades reduces residents' environmental impact and lowers operational costs (Kapsalis et al., 2024; Das et al., 2024). Additionally, compact urban living decreases reliance on vehicles, encourages active transportation, and lessens the strain on infrastructure, all of which contribute to environmental sustainability and a healthier community (Litman, 2013; Campbell-Lendrum & Corvalán, 2007). Moreover, fostering diversity in residential developments helps to create vibrant, inclusive communities that attract a variety of talents and perspectives, thereby, enhancing social cohesion and economic resilience (Moore & Piddini, 2023).

### **Section 8.3.1 – Scope**

Perth is host to a variety of public service uses that provide services to both residents of the community, as well as, to residents of surrounding rural and small urban communities e.g., hospital, schools, recreation and cultural facilities. The intent of the Plan is to recognize Perth's role as a service center and to encourage further development of public service uses **that prioritize accessibility, diversity, inclusivity and environmental sustainability** to meet the needs of residents living within a broad catchment area (including much of central and western Lanark County). Public service uses will be encouraged which are complementary or inter-related to key facilities e.g. health care and residential services related to the programs and services of the Perth and Smith Falls District Hospital and which serve to implement the hospital's strategic plan.

**Rationale:** Ensuring that public service uses are accessible and inclusive addresses equity by enabling all residents, including those with disabilities and marginalized groups, to benefit from these services. Emphasizing environmental sustainability reduces operational costs and mitigates environmental impact (Kapsalis et al., 2024; Campbell-Lendrum & Corvalán, 2007).

### **Section 8.7.1 – General Scope**

The Parks and Open Space designation encompasses areas within the Town that have established significance as part of the heritage cultural landscape, are regional, recreational parks, or sites that feature, or are intended for, parkland and infrastructure services. These are public and privately held areas that are critical elements of the Town's open space and outdoor recreational system. The policies of Section 8.1.3.20 will also apply to lands in this designation but the policies of this designation shall prevail in the event of a conflict. **Parks and open spaces will be planned and maintained to prioritize accessibility, biodiversity and climate resilience, ensuring they meet the evolving needs of the community while preserving their ecological and cultural value.**

**Rationale:** Accessibility ensures that parks and open spaces are inclusive for all residents, including those with disabilities. Biodiversity conservation protects ecological systems, enhances community well-being, and supports environmental sustainability. Climate resilience ensures that these spaces remain functional and valuable in the face of changing weather patterns and environmental challenges (Wilson & Xiao, 2023; Das et al., 2024). Balancing community needs with ecological and cultural preservation strengthens the relevance and sustainability of these spaces, fostering a sense of community pride and connection (Mwoka et al., 2021; Henderson, 2010).

### **Section 9.12.11.1 Policies - Site Plan Control Applications**

A) **All development projects shall incorporate climate-resilient infrastructure and universal accessibility measures as part of the site plan design.**

B) Council may by by-law designate one or more areas as Site Plan Control Areas. Council may require the submission of plans and drawings, by qualified professionals, for all development proposals within the Site Plan Control area. Council may require the implementation of design guidelines as they are adopted and approved for different areas of Town from time to time. **Council shall ensure that design guidelines prioritize sustainability, energy efficiency, and inclusivity.**

**Rationale:** Climate-resilient infrastructure mitigates the impact of extreme weather events, while universal accessibility ensures equitable access to buildings and spaces for all residents, including those with disabilities (Vilcins et



al., 2024; Kapsalis et al., 2024). Prioritizing these principles supports long-term environmental goals, reduces operational costs, and promotes equitable and inclusive community development (Litman, 2013; Wilson & Xiao, 2023).

The current Official Plan reflects an admirable dedication to the Town of Perth's heritage, natural environment, and sustainable growth. By prioritizing these values, the Plan effectively lays the foundation for a vibrant, inclusive, and resilient community. The South East Health Unit encourages the Town to continue building upon these strengths by embedding health-promoting and protective policies into all municipal plans, ensuring the well-being of current and future generations while preserving Perth's unique character.

Zahra Yousuf (zahra.yousuf@healthunit.org), Health Promotion Consultant at South East Health Unit and Danielle Shewfelt (danielle.shewfelt@healthunit.org), Municipal Public Health Nurse are looking forward to collaborating with you in advancing a healthy Perth.

Sincerely,

Elaine Murkin, RD, MSc.  
Manager, Population Health Department  
Leeds, Grenville and Lanark District Health Unit

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**MTO Highway Corridor Management Response to Pre-consultation Request 2025-41K-000265 Submitted on January 27, 2025/Réponse à la demande de consultation préalable au Bureau de gestion des couloirs routiers du MTO no 2025-41K-000265 soumise le 27 janvier...**

To: Forbes Symon  
Wed 2/26/2025 4:08 PM

Hi Forbes,

MTO has reviewed the Redline Discussion Draft of the Town of Perth Official Plan. Thank you for updating the OP as per the attached MTO comments provided in July 2023. The only comment we could not locate in the draft is the comment on Appendix 5. Please confirm if the comments are incorporated in the draft.

Thanks,

Tarique Kamal  
Senior Project Manager | Corridor Management | East Operations  
Ministry of Transportation | Ontario Public Service  
613-301-5425 | tarique.kamal@ontario.ca

# GUIDELINES

for New Development in  
Proximity to Railway Operations

PREPARED FOR  
THE FEDERATION OF CANADIAN MUNICIPALITIES  
AND THE RAILWAY ASSOCIATION OF CANADA

May 2013



**DIALOG** J.E. COULTER  
ASSOCIATES  
LIMITED



## APPENDIX B

### Community and Public Comments

**From:** Louise McDiarmid

**Sent:** Wednesday, January 22, 2025 9:20:05 PM

**To:** Judy Brown; Isabel Anne McRae; Barry Smith; David Bird; Ed McPherson; Jim Boldt; Gary Waterfield; Joanna Bowes; Michael Touw

**Subject:** Official Plan updates

I would like to thank town council and staff for all the long hours and hard work they put into keeping Perth running as we cope with living in a world of uncertainty. I don't know how you manage to get through all the background material you have to read before each council meeting.

In the face of our changing climate, I am greatly concerned about environmental protection and the part it plays in the new official plan. Among my major concerns locally, are our forests and wetlands.

We are fortunate to have a number of wetlands in the Perth and Lanark County area. Their presence means we are less vulnerable to the threat of wildfires and flooding brought about by climate-change. We also enjoy the restorative effects of being in nature, and the various forms of wildlife it supports.

The Ontario government passed an Environmental Bill of Rights (EBR) in 1993. This requires various government ministries, including Housing, Natural Resources and Environment, to act in accordance with the EBR.

In her December 2024 report, the Auditor General stated:

"Our audit focused on assessing whether prescribed ministries contributed to the effective operation of the Act [EBR], "not only by meeting the minimum legal requirements of the EBR, but also by performing their duties and exercising their discretion in a way that is consistent with the EBR's purposes."

Upon examination of the activities and policies of the Ministry of Natural Resources, she reports:

"We found that, following the changes made in December 2022 (as outlined under Recommendation 12: Action 1) the Natural Resources Ministry is not considering new wetland protection policies or plans, or further changes to the Ontario Wetland Evaluation System."

This came after the provincial government had greatly reduced environmental protection for wetlands in 2022, not for environmental reasons but for political ends.

The Town of Perth is committed to using a climate change lens for viewing its decisions, and I am wondering how influential this lens has been in the revised Official Plan. I hope that the environment has been given high priority.

Louise McDiarmid  
Perth



**Re: Official Plan Update**

Jack Tannett

To: Forbes Symon

Mon 1/6/2025 12:34 PM

Forbes

Many thanks for your quick reply which was very much appreciated.

Thanks, you are right. I missed that link to Section 5.5 (E).

I would not want to try to wordsmith your wording, as you are the expert in this of course.

My only comment would be that, in reading this section 5.5 (E), I would have preferred if it would more clearly highlight the requirement for a "Construction Management Plan" at the time of submitting a Development application. It just appears to me that this important requirement seems to be "buried" within a traffic impact study and under the words "May be required", as opposed to "will be required". Ideally it would be separate from the "Traffic impact study", which has as its major focus the impact on traffic, as opposed to the impact on infrastructure and on local streets and communities, and so on (although I acknowledge that the first sentence of section 5.5 (E) does mention the words "public health and safety"). You have to go all the way down to the final sentence to read that a traffic impact study "may also be required to identify the location and nature of construction traffic.... etc." and it does not specifically call for a "Construction Management Plan".

I think in many cases, the subject of Construction Traffic is so critical to the viability of a given development that it should get that extra visibility by making the requirement for a specific Construction Management Plan stand out more clearly.

But anyway, that's just one person's view, and I hope it is helpful.

With many thanks and best regards

Jack



**From:** Thies Schacht  
**Sent:** Tuesday, February 11, 2025 9:14:01 PM  
**To:** Joanna Bowes  
**Subject:** Affordable housing

Good evening Joanna

I am not sure if my last email reached you about affordable housing.

I don't agree with the proposed 25% affordable housing per development.

This is a big burden for the developers to create this amount of units.

Even the provincial standards are 10% or less.

I think the proposal from the town of Perth will turn developers away.

Affordable Housing should not be on the shoulders of the developers.

As you may have seen us this evening we were there for info only, we are pro development and hoping Cavan home and other development will be successful to help with the necessary growth of our community,

Because we all need to grow to create a sustainable Town , ( taxes revenue and Restaurant, services industry small business sustainability) in the future.

I hope You and the Town Council, Mayor and CAO, support the Town to Grow to become sustainable for the Future.

Thank you Penny and Thies Schacht





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March 7, 2025

Joanna Bowes, MCIP RPP  
Director of Development Services  
Town of Perth  
80 Gore Street East  
Perth, Ontario  
K7H 1H9

**Re: Town of Perth Official Plan Review  
(Perthmore Development Co. Ltd.)**

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Dear Ms. Bowes,

I am writing on behalf of Perthmore Development Co. Ltd. and Maurice DeCaria in relation to the Town's ongoing work to update the Official Plan for the Town of Perth. This letter is provided further to previous letters of July 31, 2025 and December 20, 2021 and expresses several concerns and suggestions relating to Perthmore's and Mr. DeCaria's interests, which are largely related to the development of current and future phases of the Perthmore Glen Community.

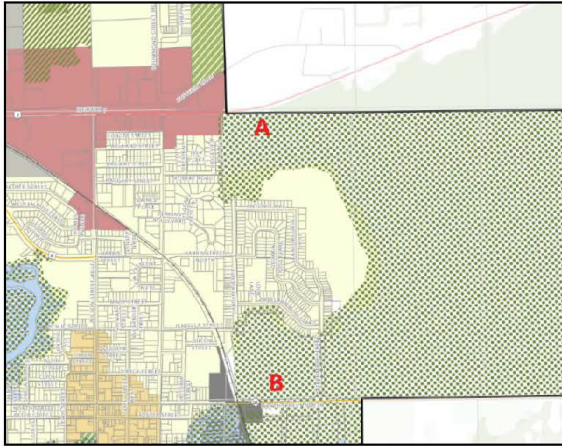
The comments provided are intended to be constructive and they are intended to promote the logical development of future phases of Perthmore and other associated lands owned by Mr. DeCaria:

1. There are two areas of land under Perthmore ownership that presently do not appear to have land use designation on the draft Official Plan Schedule A. The first of these areas (identified as Area A on the sketch below) is immediately south of the Town limits in the vicinity of Highway 7, while the second of these areas (identified as Area B on the sketch) is to the south of Perthmore Glen and north of North Street North and west of Perthmore Street.

It is acknowledged that these lands are presently identified as constrained; Area A is identified as Provincially Significant Wetland, and Area B is identified as floodplain. Nevertheless, Perthmore has long-term development aspirations of these lands and it is anticipated that their characteristics may evolve in the future, especially if higher-order transportation corridors are pursued. It is understood that some time ago Perthmore completed an assessment relating to natural heritage constraints in the vicinity of Area A and that the Town was provided with a copy of this assessment.

---

experience • knowledge • integrity



**Figure 1: Excerpt from Draft Schedule A (Land Use)**

Accordingly, on Schedule A it is requested that Area A is designated Highway Commercial (which is consistent with the designation of the lands to the immediate west and a logical designation given the proximity to Highway 7), and that Area B is designated Commercial.

2. On draft Official Plan Schedule B (Transportation) a future proposed arterial roadway is identified. The Schedule and associated policy should make it clear that the alignment of the arterial or any other roadway connections to Highway 7 may evolve depending on a number of factors, including cost sharing, technical studies, and nearby development patterns.
3. Section 3.2 reads in part: "The housing mix desirable for the Town of Perth is intended, over time, to reduce the percentage of low-density residential development (i.e. singles, semi and duplexes) and increase the supply of medium density residential development (i.e. tri-plexes, quads, townhouses and small apartments)." and contains the following density targets:

*Low Density = 50 to 55% of future residential development*

*Medium Density = 30 to 35% of future residential development*

*High Density = 10 to 15% of future residential development*

By restricting the percentage of medium and high density units to 40-50 percent, these targets may in fact prevent the development and supply of medium and high density and more affordable dwelling units. In order to satisfy related Provincial Planning Statement policies and local affordable housing objectives, Staff are strongly encouraged to provide more flexible targets.

4. Section 5.5.6 ("Road Improvements") should make reference to Schedule B, should acknowledge that road improvements includes work to the both the existing and planned transportation network, and should acknowledge that projects may be initiated by the County, municipality, private sector, or a combination of these (e.g. with sharing of costs).
5. Section 5.5.11 should be expanded upon, in part to establish if stated requirements apply to individual development sites or subdivisions. For example, Policy 5.5.11(A) requires a 9m width for access to public roads. Is this asphalt width or right-of-way? Is this for development sites? Single family dwellings? New public rights-of-way? This section should also acknowledge that accesses may already be in place.
6. The references to NFPA – an American self-funded non-profit organization – within the Official Plan (Sections 5.5.11 and 7.6) are problematic as presented in that there is limited public access to this information. At minimum, it is suggested that the standards/guidelines that are referred to within the Official Plan be made available elsewhere or included as appendices to the Official Plan. My recollection is that although the NFPA 1140 may be helpful and appropriate in some cases, there are also guidelines/standards that may not relate to the local context, for example those relating to minimum right-of-way widths, turn radii, etc.
7. Policy 7.3.2.11 triggers Site Plan Control for development within 120 metres of a watercourse/waterbody/wetland. Please confirm the basis for this modification and which land use types this applies to?
8. Some of Section 8.1.1. b (re: design principles for new residential neighbourhoods) appears as though it might have been prepared in relation to another area of Perth. Further, the principles may be desirable for an overall neighbourhood, but it should be acknowledged that not every development application will be able to or will be expected to satisfy all principles. For example:
  - a. Further to item i), it doesn't always make sense to provide a full range and mix of housing and density types and densities. The scale of development is critical here.
  - b. Further to item ii), and specifically in relation to Perthmore, a grid roadway network may not be practical given existing development, the potential future arterial / Highway 7 connection, and environmental constraints.
  - c. Further to item vi), could Staff please confirm what is intended by "Facilitate alternative design concepts..."
  - d. Items xi) and xii) do not seem to apply to Perthmore.

9. Policy 8.1.3.1 d) could be interpreted as restricting development to four storeys and is somewhat at odds with Policy 8.1.3.5 d) and 8.1.3.10 a) 19. iii), which acknowledge permitted heights of up to 6 storeys for some lands, including Perthmore. This is simply being brought to Staff's attention.
10. Pursuant to Policies 8.1.3.2 and 8.1.3.12, which among others, speak to uses permitted on lands designated Residential, both apartment dwellings and neighbourhood-serving commercial uses are permitted/encouraged within the Official Plan. It is requested that mixed-use buildings be expressly identified as being permitted within 8.1.3.2 in order to reduce any confusion around this in the future. For example, it does not seem as though a four or five storey building with ground floor commercial/personal service with residential units on the upper floors is expressly permitted. In fact, paragraph 8.1.3.12 (d) seems to provide language that would contradict such a proposal.
11. Policy Section 8.1.3.4 (Housing Densities) should be made less prescriptive to ensure that there can be overlaps in uses and densities. For example, townhouses or small apartments that exceed 60 units per gross hectare should be permitted. Similarly, policy support for apartment buildings of up to six storeys in height contradicts the establishment of a maximum of 100 units per gross hectare for apartments.
12. Policy 8.1.3.4 c) specifies that new neighbourhoods should have a density of 26-34 units per net hectare. Perthmore is a low-density neighbourhood and has a density of approximately 29 units per net hectare. There are several policies within the plan that encourage the construction of affordable housing and incorporating a mix of medium and high density built forms. In order for the housing mix provided in Section 3.2 to be achieved, the overall density target of 26 to 34 units per hectare will need to be broadened.
13. The density ratios provided within Policy 8.1.3.5 b) may be impractical to implement, even if the development area is greater than 2 hectares. For example, Perthmore Phase 6 is approximately 3.2 net hectares (5.5 gross hectares) and doesn't satisfy these requirements. A tasteful unit mix is nevertheless provided, incl. a small apartment building, semis (some with basement apartments), and singles. Stringent ratios such as these could impede development from supplying housing pursuant to market demand at any given time and it is suggested that the ratios are broadened or that language is softened.
14. References within the Official Plan to the provision of affordable housing (incl. those within Policy 8.1.3.9) should be consistent with applicable Provincial policy. Furthermore, policies encouraging higher density development (see comments 3, 11, 12, and 13 above) will likely translate into a greater supply of affordable housing within the Town of Perth, which will have a positive effect on local supply and affordability.



15. The classification of roads within future phases of Perthmore hasn't yet been established, but it is likely that small apartment buildings may be proposed to front on roads that are not classified as major collectors or arterials. Accordingly, it is requested that Section 8.1.3.10 Residential Design Principles, paragraph (a) 19. is revised to permit apartment buildings to be located on local roads, where supported by appropriate justification.
16. Section 8.1.4 addresses lands within Perth referred to as 'new residential area.' We are not aware of any associated designation within the draft Official Plan schedule. The policies within the section seem to apply to certain development areas. Additional clarity within this section would be appreciated.
17. In part, Policy 8.1.4.2 a) reads, "The mix of housing types and densities will be designed to meet the projected requirements of future residents and which are consistent with the housing policies of this Plan." This is similar to the statement provided within Policy 8.1.3.4 b), which reads "The specific mix of housing approved through the registration of the plan of subdivision should reflect community housing needs at the time." Official Plan policy should be relaxed in order to ensure that higher density, more affordable housing can be proposed and supplied by proponents of development.
18. There are several references to the allocation and potential restriction of servicing capacity, including policies within Sections 5.2.1 and 8.1.4. Can staff confirm if allocation is administered in accordance with Appendix 7 ("Servicing Capacity Allocation Protocol")? Are there other servicing allocation priorities in the Town that Perthmore should be made aware of?
19. Will policy 8.1.4.2 b) continue to apply? This depends on how the "New Residential Area" designation will be treated.
20. Natural Heritage Features Policy 8.6.4 (h) 1., which pertains to 'Linkages, Corridors, and Wetlands,' refers to the inclusion of a 30 metre setback. See Figure 2 below. It is my understanding that linkages and corridors within the Natural Heritage System are themselves represented within the Official Plan as a 30 metre buffer from significant natural heritage features. Can staff please confirm that the linkages and corridors comprise a 30 metre buffer and that no additional buffer applies to these features?

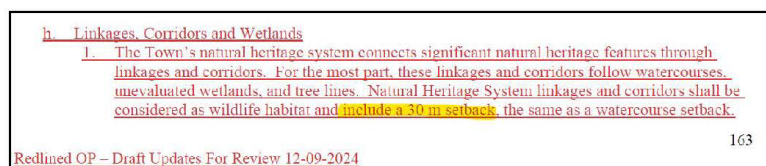


Figure 2: Excerpt from Official Plan Section 8.6.4.



We trust that staff will appreciate the rationale for the above comments, and it is our hope that Staff will be willing to make necessary adjustments in response. Please do not hesitate to contact me should you wish to discuss any of the comments provided.

Finally, please consider this correspondence as a written submission establishing my client's appeal rights under the Planning Act.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Clare'.

Benjamin Clare, MCIP RPP  
Senior Planner



March 20, 2025

Ms. Amanda Noël  
Director of Legislative Services / Clerk  
Town of Perth  
80 Gore Street East  
Perth, ON K7H 1H9

Via email: [anoel@perth.ca](mailto:anoel@perth.ca)

**Subject: Official Plan Update – Official Plan Amendment (OPA 18) – Comments on ‘Redlined Discussion Draft Official Plan Update 27-10-2024 For Review by Public and Agency’ on behalf of Caivan (Perth GC) Limited**

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Dear Ms. Noël:

The following letter comprises written comments regarding the Town of Perth ‘Redlined Discussion Draft Official Plan Update 27-10-2024 For Review by Public and Agency’ (“Draft OP”), submitted on behalf of Caivan (Perth GC) Limited (“Caivan”). Caivan is the owner of the Western Annex Lands within the Town of Perth’s settlement area boundary, which are generally described as lands bounded by the Tay River to the north and east, the Town of Perth municipal boundary to the west, and the municipal boundary and Grants Creek to the south.

As the Town is aware, Caivan is pursuing a major redevelopment within the Western Annex Lands. Applications for Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision were previously filed with the Town and the County of Lanark and are now before the Ontario Land Tribunal in OLT-23-000534.

On behalf of our client, we submit that the outcome of OLT-23-00534 – specifically the outcome of Caivan’s OPA appeal – should be implemented into the Town’s forthcoming Official Plan. As a means of addressing this issue on an interim basis, we propose that a notation appear in the OP’s Schedules indicating that the Western Annex Lands are currently subject to a private appeal in OLT-23-00534. This notation can later be removed through a housekeeping amendment when the outcome of OLT-23-00534 is known. In terms of grounds for this proposed notation, Caivan relies upon all of its various submissions in support of its major redevelopment proposal, which is currently the subject of Tribunal-led mediation.

In addition to the foregoing, we note that a portion of the Western Annex Lands, being the “Perth Golf Course lands” are referred to throughout the Draft OP. Specific references to the “Perth Golf Course lands” are included in the following sections of the Draft OP:

- 3.2 Housing (a), and (e);
- 8.1 Residential Areas, 8.1.1 Development Concept (b);
- 8.1.3 Residential Area Designation Policies, 8.1.3.20 Parks, Open Space and Natural Areas (f);
- 8.1.4 New Residential Area Designation:
  - 8.1.4.2 Development Concept (a);
  - 8.1.4.3 Range of Permitted Uses in the New Residential Area (a); and
  - 8.1.4.4 Access Constraints.

The “Perth Golf Course lands” are designated as “Residential”, “Environmental Protection”, and “Parks / Open Space” on Draft Schedule A Land Use in the Draft OP (see **Figure 1**).



We respectfully submit that, as the “Perth Golf Course lands” are not designated as “New Residential Area” on Draft Schedule A Land Use, policies referring to the “Perth Golf Course” should not be included in Section 8.1.4 New Residential Area Designation, and subsequent subsections.

The same issue occurs in the current Town of Perth Official Plan (Including amendments, Per By-law 3304-16 [OP Amendment #16], Passed April 16, 2019, Consolidated September 2019). The Perth Golf Course lands are referenced in Section 8.1.4 New Residential Area Designation; however, the lands are not designated as New Residential Area on Schedule A Land Use, which is currently only able to be viewed through the Town of Perth Community Map online GIS mapping (see **Figure 2**). The Perth Golf Course lands are currently designated Special Study Area, Residential, Environmental Protection, and Parks and Open Space. The only area currently designated ‘New Residential’ are the Tayview lands along Christie Lake Rd.

Figure 1: Excerpt of Draft Official Plan for the Town of Perth Schedule A Land Use

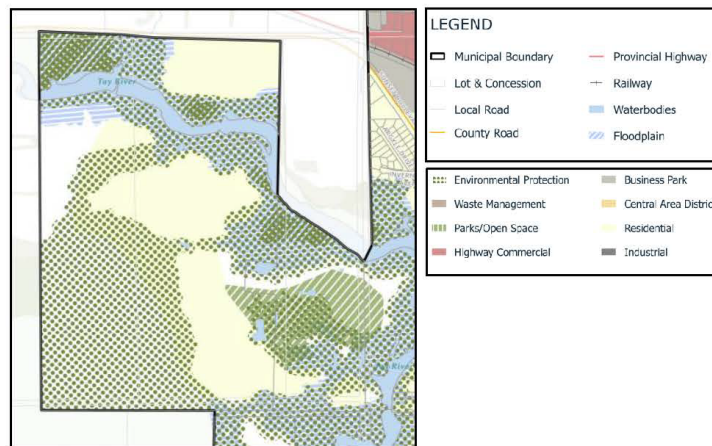
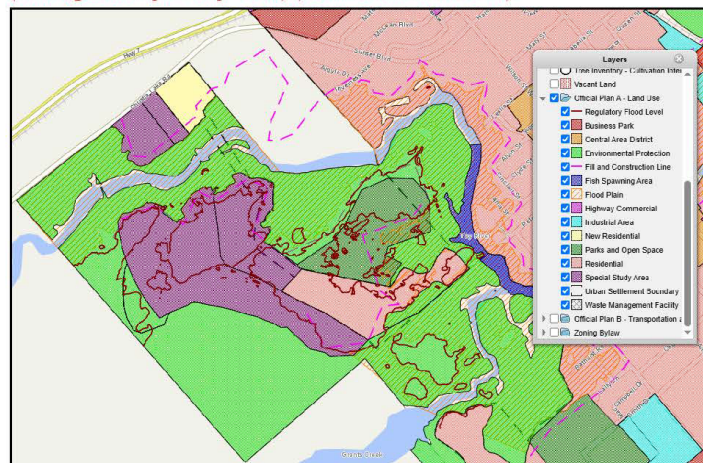


Figure 2: Excerpt from Town of Perth Community Map, 'Official Plan A - Land Use' ([www.cgis.com/cpal/?map=Perth](http://www.cgis.com/cpal/?map=Perth)) (accessed March 18, 2025)





Thank you for the Town's consideration of these comments. Should the Town wish to discuss, please feel free to contact the undersigned at [Nadia.De-Santi@wsp.com](mailto:Nadia.De-Santi@wsp.com) or at 613.690.1114.

Yours sincerely,

**WSP**

A handwritten signature in black ink, appearing to read 'N. De Santi'.

Nadia De Santi, MCIP, RPP  
Practice Lead  
Urban and Community Planning

cc: Susan Murphy, President, Land Development, Caivan  
Hugo Lalonde, Director, Land Development, Caivan  
Patrick Harrington, Partner, Aird & Berlis LLP  
Brendan O'Callaghan, Partner, Aird & Berlis LLP

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Bonita F  
To: Joanna Bowes  
Cc: Gary Waterfield; Forbes Symon  
Sun 4/27/2025 11:17 AM

Thank you, Joanna.

Might the Town include 1:350 in the Official Plan to state its intention to move towards that standard, even if RVCA is not currently able to comment beyond 1:100? In other words, provincial CA regulations may change before the next OP update.

Thanks for considering.

Warmly,  
Bonita