

March 27, 2023

Julie Stewart, County Planner
County of Lanark
99 Christie Lake Road
Perth, ON K7H 3C6

RE: Consent Application B21/079
Vacant Lot on Brock Street and Provost Street
Lot 16, Part Lots 15 & 17, South Side of Brock Street, Part Lots 15 to 17
North Side of Cockburn Street, and Part of Irwin Street.
Compiled Plan No. 8828, Town of Perth
Owner: Tayview Properties Inc.
Applicant: 9695443 Canada Inc. c/o Stefano Ferrante

Dear Ms. Stewart,

ZanderPlan Inc. has been retained by 9695443 Canada Inc. c/o Stefano Ferrante to assist with a Consent Application for the above noted property to support the future development of a stand-alone 54-unit residential apartment building and associated parking on the retained parcel. The property is located south of Highway 43 fronting to the unopened road allowances of Provost Street and Brock Street. The proposed Consent Application is to sever a portion of the property containing a former waste disposal site from the area to be developed on the retained lot. The severed portion will remain naturalized in its current state. A Phase I and II ESA was completed for the retained portion to be developed with a Record of Site Condition to remediate the contaminated lands to support future residential development. Completion of the Consent Application is required to separate the un-remediated lands, to allow a future Site Plan Control application to be made for the residential use.

3M Canada has an existing industrial facility located east of the subject property. Given the intended residential use of the retained lands land use compatibility is required to ensure the retained parcel can be developed with a sensitive residential use beside an existing industrial facility. Through discussions with the Town of Perth, it has been established the 3M facility is a Class III Industrial Use. The subject property cannot meet the required industrial separation distances pursuant to the D-6 Guidelines or Town of Perth Zoning policies. Noise and odour studies have been completed to support a reduced setback to allow the Consent to proceed.

SUBJECT PROPERTY

The subject property consists of a vacant parcel of land which currently has no built road frontage, but is located along the unopened road allowances of Brock Street and Provost Street. The property has an area of approximately 10,240 square metres in size with 42.1 metres and 93.2 metres of frontage on the unopened road allowances of Provost Street and Brock Street respectively (See Figure 1). There is no built development on the property. Sparse tree cover is located on the north half of the property. Lower lying areas fall on the very south end. A former landfill is located in a portion of the northeast corner closer to the Brock Street unopened road allowance. The proposed Consent application will sever the contaminated lands from the remainder of the property, which has been remediated, to support future development.

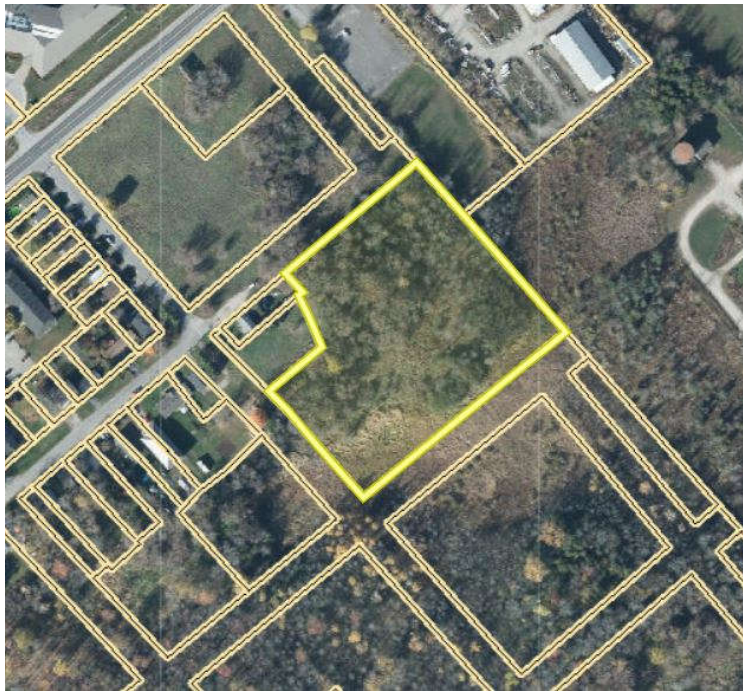


Figure 1 – Aerial View of the Subject Lands (AgMaps)

Lands to the north of the property consist of a mix of land uses including a former commercial building (Home Hardware), the Rideau Christian Fellowship Church, some residential uses, and a rail line. To the east of the property is 3M Canada, an industrial land use. To the south of the property are mainly undeveloped floodplain lands abutting the Tay River. To the west are residential uses fronting to Provost Street and Brock Street, with Algonquin College located on the west side of Highway 43.

DEVELOPMENT PROPOSAL

The development proposal is seeking to sever off a portion of the property containing a former landfill measuring 4,165.8sqm in size (See Figure 2). The new lot line will jog around two monitoring wells leaving them with the retained lands measuring 10,362.3sqm. The Consent application has been submitted to the County of Lanark, and assigned file number B21/079. If conditionally approved, a Site Plan Application will be submitted for the retained parcel for a new 54-unit, 3-storey residential apartment dwelling.

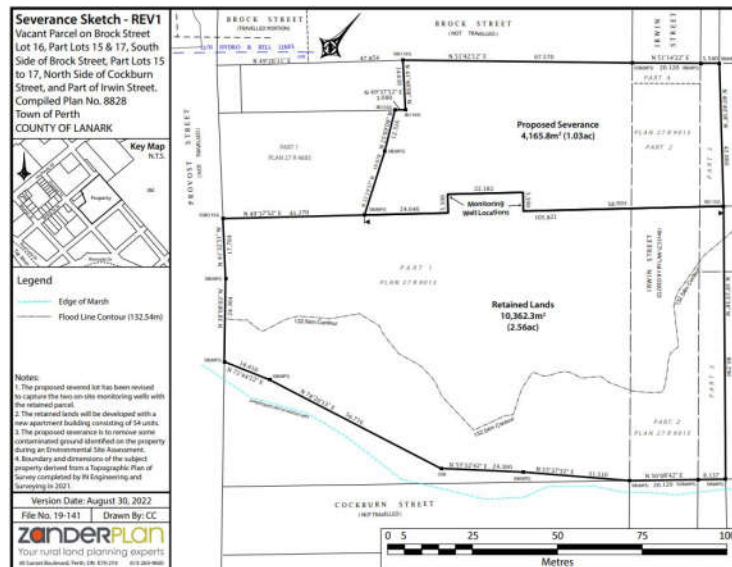


Figure 2 – Severance Sketch Submitted for the Property

PROVINCIAL POLICY STATEMENT (PPS) 2020

The *Provincial Policy Statement (PPS, 2020)*, issued under the authority of Section 3 of the *Planning Act*, provides policy direction on matters of Provincial interest related to land use planning and development and provides for appropriate development while protecting resources of provincial interest. The Provincial Policy Statement 2020 came into effect May 1, 2020 replacing the previous Statement issued April 30, 2014.

Section 1.0 of the PPS speaks to Building Strong Healthy Communities with policies for Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns found under **Section 1.1**. It encourages “healthy, liveable and safe communities” through a variety of means, including efficient development and land use patterns, a range and

mix of land uses, protection for the environment and the public, and access to available services and infrastructure. A severance to support future development of the property with a 54-unit residential apartment building will help meet the long-term needs for residential demand in the Town of Perth, particularly for students attending the College (Sec. 1.1.1b). Development can be located away from the lower lying area on the south end of the property to avoid development or land uses that would impact environmental health and safety and conserve biodiversity (Sec. 1.1.1h). The contaminated portions of the site have been remediated to ensure impacts on public health and safety are mitigated (Sec. 1.1.1c). The property is located on the edge of the Settlement Area of Perth adjacent to 3M Canada. Development would not preclude or hinder Settlement Area expansion in the future if desired (Sec. 1.1.1d). Appropriate land use planning has been applied to design the site to support residential intensification using existing infrastructure to achieve cost-effective development on municipal servicing (Sec. 1.1.1e). Sufficient land shall be made available to accommodate an appropriate range and mix of uses to meet projected needs. Within Settlement Areas sufficient land shall be made available through intensification and redevelopment (Sec. 1.1.2). With increased demand for residential housing options across Ontario a severance to support a new residential apartment will provide an appropriate mix of uses to complement the mainly single detached and lower density housing in the area.

Section 1.1.3 of the PPS speaks to Settlement Areas which include cities, towns, villages and hamlets. Settlement areas shall be the focus for growth and development (1.1.3.1) with land uses based on densities and mixes of uses which:

- a) *efficiently use land and resources;*
- b) *are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;*
- c) *minimize negative impacts to air quality & climate change, & promote energy efficiency;*
- d) *prepare for the impacts of a changing climate;*
- e) *support active transportation;*
- f) *are transit-supportive, where transit is planned, exists or may be developed; and*
- g) *are freight-supportive.*

The proposed severance will support a new residential use that will efficiently use the available lands outside of the lower-lying areas on the south side of the property, where expansion of the municipal servicing and infrastructure can be economically achieved. The lands are already zoned Residential Fourth Density (R4) which supports the development of higher density uses.

Introducing a higher density use helps reduce impacts to air quality and climate change by promoting energy efficiency through compact design. With the target demographic being students of Algonquin College proximity to the school will facilitate active transportation.

Planning authorities shall identify appropriate locations and promote opportunities for intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites (Sec. 1.1.3.3). The proposed apartment will promote intensification, redevelopment and compact form, while mitigating risks to public health and safety by remediating the site prior to development (Sec. 1.1.3.4).

Section 1.2.6 of the PPS speaks to Land Use Compatibility between major facilities and sensitive land uses, requiring development to be planned to minimize and mitigate adverse impacts from odour, noise and other contaminants on public health and safety (Sec. 1.2.6.1). 3M Canada is a major facility adjacent to the subject property. The long-term operational and economic viability of the major facility must be protected from new sensitive land uses (Sec. 1.2.6.2). The Consent application will result in lot creation to support a new sensitive residential apartment adjacent to the industrial facility. The D-Series Guidelines for the Province outline the required policies and provisions for the establishment of sensitive land uses in proximity to major facilities and will be outlined in detail later in this justification report to show compliance with Section 1.2.6 of the PPS.

Section 1.4 of the PPS speaks to Housing. The proposed Consent application will support the future development of a new apartment building, contributing to an appropriate range and mix of housing options at higher densities to complement the mainly lower density housing in the area (Sec. 1.4.1). Units will be provided mainly as smaller Bachelor and One-Bedroom style layouts with affordable housing options provided, geared toward lower income and student residents (Sec. 1.4.3). The range and mix of housing will partly be provided by permitting and facilitating residential intensification of the property (Sec. 1.4.3b.2), directing the new housing to areas where infrastructure and servicing can be provided (Sec. 1.4.3c) and providing densities of housing that efficiently use land, resources and infrastructure (Sec. 1.4.3d) while minimizing housing cost through compact form (Sec. 1.4.3f). The severance to support a new residential apartment is consistent with the housing policies of Section 1.4 of the PPS.

Section 1.6.6 speaks to Sewage, Water and Stormwater. Existing municipal servicing within the Provost Street road allowance will be extended to the property to service the new residential apartment building. Municipal sewage and water services are preferred for Settlement Areas to minimize risk to public health and safety. *Within settlement areas with existing municipal*

sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services (Sec. 1.6.6.2).

Section 2 of the PPS speaks to the Wise Use and Management of Resources with policies for the protection of natural heritage, water resources, agricultural lands, minerals and mineral aggregate resources, cultural and archaeological heritage. The subject property is partially located within the floodplain of the Tay River, but the site itself does not contain any identified natural heritage. A topography survey has been completed to delineate the floodplain elevation on the site. Some lower-lying areas are located on the south side of the parcel away from the area proposed for development, but these are not considered natural heritage pursuant to the Rideau Valley Conservation Authority mapping. Development and site alteration on the property will occur outside of wetland areas (Sec. 2.1.4), outside of significant wetlands, woodlands, valleylands and habitat (Sec. 2.1.5), outside of any fish habitat (Sec. 2.1.6) and will not occur on lands adjacent to natural heritage (Sec. 2.1.8). The future development is not expected to impact any natural heritage in the area.

Section 2.2 of the PPS speaks to Water. There are no significant surface or groundwater features identified on or abutting the property that may be impacted by the development. The Tay River is located further south of the site but well separated from the proposed use. Stormwater management will be considered as part of a future Site Plan Control application to the Town. Development will be located above the established flood elevation, and the site will be serviced with municipal piped water.

Section 2.3 speaks to Agriculture policies, permitted uses, and lot creation on agricultural lands. The property is located within the Town of Perth and is not designated for agricultural use. The proposed Consent and future Site Plan for the property would not impact any agricultural lands.

Section 2.4 speaks to Minerals and Petroleum resources, neither of which has been identified on or within proximity to the property. **Section 2.5** speaks to Mineral Aggregate Resources which also have not been identified on the property.

Section 2.6 speaks to Cultural Heritage and Archaeology. The site is located a significant distance from the Tay River and development would not impact the cultural landscapes along the river corridor. A former landfill was located on the subject property which has been remediated to support the development. It is unlikely any resources of archaeological significance would be found on the property.

Section 3.0 of the PPS speaks to Protecting Public Health and Safety with policies for Natural Hazards found under Section 3.1. The site falls partially within a Regulated area along the Tay River, which may be subject to flooding. A topographic survey was completed which established the flood elevation across the property. All development and site alteration will be directed above the flood elevation and will not be located within any flooding hazards (Sec. 3.1.2b) or areas rendered inaccessible during times of flooding (Sec. 3.1.2c). There are no hazardous forest types for wildland fire indicated on the property (Sec. 3.1.8).

Section 3.2 of the PPS speaks to Human-Made Hazards. The site does contain a former landfill, but does not contain any lands affected by mine hazards; oil, gas and salt hazards; or former mineral mining operations, mineral aggregate operations or petroleum resource operations (Sec. 3.2.1). The contaminated lands from the former landfill were assessed through Phase I and II Environmental Site Assessments, the lands were remediated, and a Record of Site Condition has been authorized to ensure no adverse effects from contaminants (Sec. 3.2.2). The severed lot is not anticipated to impact development of the retained parcel.

Overall, the proposed Consent application for the property is consistent with the policies and provisions of the Provincial Policy Statement (PPS) 2020.

ENVIRONMENTAL LAND USE PLANNING GUIDES (D-SERIES GUIDELINES)

The Province of Ontario Environmental Land Use Planning Guides, typically referred to as the D-Series Guidelines, consist of several different guides that speak to environmental considerations and requirements for industrial land use, sensitive lands, sewage and water services, and private wells. 3M Canada has an industrial facility located to the east of the subject property which could potentially impact a new residential apartment, which would be considered a sensitive land use. The D-1-3 Guide sets forth definitions used for compatibility assessments. The D-6 Guide provides policies for Compatibility between Industrial Facilities and sensitive land uses which need to be considered for this proposal. The D-1-3 guideline provide definitions for Land Use Compatibility including a definition for a sensitive land use:

A building, 'amenity area' or outdoor space where routine or normal activities occurring at reasonably expected times would experience 1 or more 'adverse effect(s)' from contaminant discharges generated by a nearby 'facility'. The 'sensitive land use' may be a part of the natural or built environment. Depending upon the particular 'facility' involved, a sensitive land use and associated activities may include one or a combination of:

- i. *Residences or facilities where people sleep (e.g. single and multi-unit dwellings, nursing homes, hospitals, trailer parks, camping grounds, etc.). These uses are considered to be sensitive 24 hours/day.*
- ii. *A permanent structure for non-facility related use, particularly of an institutional nature (e.g. schools, churches, community centres, day care centres).*
- iii. *Certain outdoor recreational uses deemed by a municipality or other level of government to be sensitive (e.g. trailer park, picnic area, etc.).*
- iv. *Certain agricultural operations (e.g. cattle raising, mink farming, cash crops).*
- v. *Bird / wildlife habitats or sanctuaries.*

A new residential apartment building on the retained lands from the Consent application would constitute a sensitive use as it is a residence or facility where people will sleep. Any associated amenity areas relating to the apartment would also be considered sensitive to potential impacts from industrial uses.

The D-1-3 guide provides definitions for three separate classes of Industrial Facility based on the size of the use, daily operations, emissions, and site activity. The definitions for Class I, II and III Industrial Facilities are as follows:

Class I Industrial Facility

A place of business for a small scale, self-contained plant or building which produces/stores a product which is contained in a package and has low probability of fugitive emissions. Outputs are infrequent, and could be point source or fugitive emissions for any of the following: noise, odour, dust and/or vibration. There are daytime operations only, with infrequent movement of products and/or heavy trucks and no outside storage. See Guideline D-6, "Compatibility Between Industrial Facilities and Sensitive Land Uses" for classification criteria and examples to categorize a specific industry.

Class II Industrial Facility

A place of business for medium scale processing and manufacturing with outdoor storage of wastes or materials (i.e. it has an open process) and/or there are periodic outputs of minor annoyance. There are occasional outputs of either point source or fugitive emissions for any of the following: noise, odour, dust and/or vibration, and low probability of fugitive emissions. Shift operations are permitted and there is frequent movement of products and/or heavy trucks during daytime hours. See Guideline D-6, "Compatibility Between Industrial Facilities and Sensitive Land Uses" for classification criteria and examples to categorize a specific industry.

Class III Industrial Facility

A place of business for large scale manufacturing or processing, characterized by: large physical size, outside storage of raw and finished products, large production volumes and continuous movement of products and employees during daily shift operations. It has frequent outputs of point source and fugitive emissions of significant impact and there is high probability of fugitive emissions. See Guideline D-6, "Compatibility Between Industrial Facilities and Sensitive Land Uses" for classification criteria and examples to categorize a specific industry.

The D-6 guideline sets forth policies for compatibility with Industrial Facilities, intended to prevent or minimize future land use problems due to the encroachment of sensitive land uses and industrial land uses on one another. Separation is measured in two ways: through minimum separation distances and through influence areas. The Ministry of the Environment, Conservation and Parks (MECP) has established the following influence areas for industrial uses:

Class I — 70 metres

Class II — 300 metres

Class III — 1000 metres

The actual influence area for an industrial use is site-specific, and unless technical studies have been completed to establish the actual area of influence, the potential influence areas listed above apply. Influence areas are not a strict setback for the development of sensitive uses. New sensitive uses can be established within the influence areas of industrial uses, and new industrial uses can be established in proximity to sensitive uses, so long as they meet the required separation distances and are supported by technical studies deemed appropriate.

The D-6 Guideline also provides direction for minimum separation distances required between sensitive uses and industrial facilities. The minimum separation distances are:

Class I—20 metres minimum separation distance

Class II—70 metres minimum separation distance

Class III—300 metres minimum separation distance

Separation distance measurements can be calculated in one of two ways. General land use plans measure from the area designated for the industrial use to the area designated for the sensitive use. This method is generally applied when the industrial and sensitive uses share a common property line. Site specific plans measure from the closest existing, committed or proposed property/lot line of the industrial land use to the property/lot line of the closest existing, committed or proposed sensitive land use. This approach is often used when other

lands containing things like roads or non-sensitive uses are located between the sensitive use and the industrial facility. This provides for the full use and enjoyment of both properties.

Given the industrial facility shares a common lot line with the subject property, the site specific plan method cannot be utilized since there is no separation between the uses. It is notable that it is not the intent of the D-Series Guides to prohibit sensitive land uses on properties directly abutting lands containing a major facility. Adequate separation can be achieved by locating sensitive uses as far from major facilities as possible, using lands on-site to meet separation requirements. The future apartment building and associated amenity areas will be located on the far west side of the property furthest from the current facility. The stormwater management features will be located to the east side of the subject property closer to the facility since those features are not considered sensitive. Separation distances using the general land use plan method are shown in Figure 3 below.

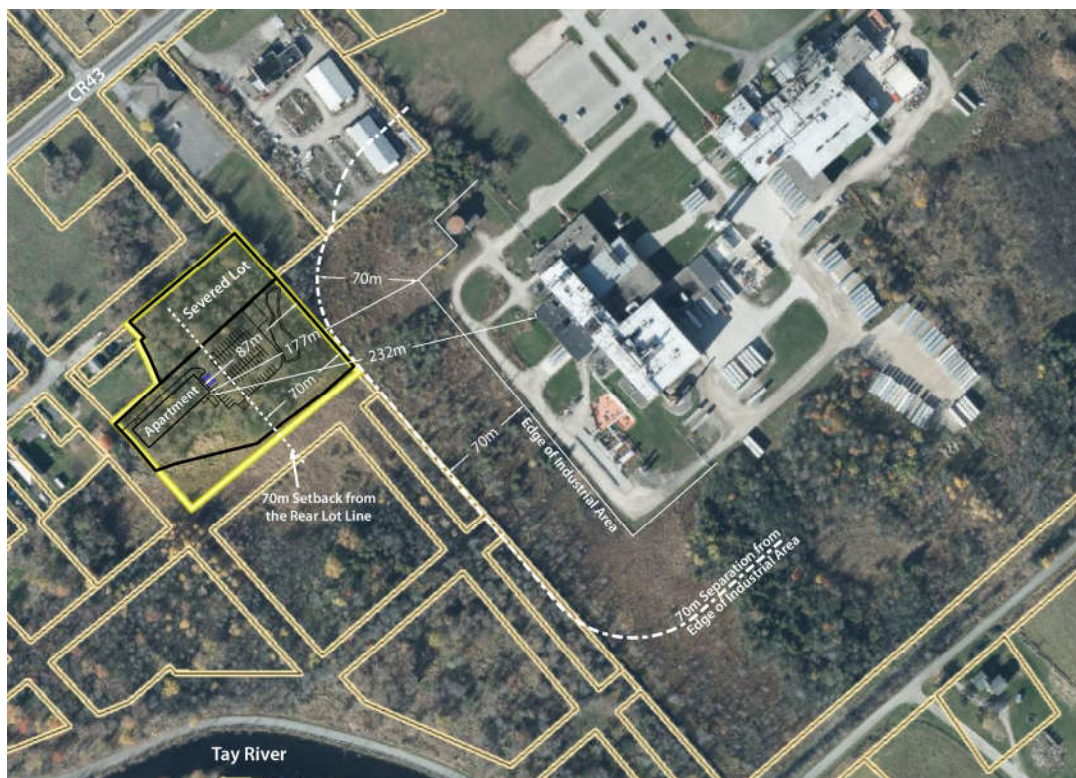


Figure 3 – Separation Distances between 3M Canada and the Proposed Apartment

As seen in Figure 3 the proposed apartment will be setback 87 metres from the rear (east) property line. Additionally, the edge of the industrial area on the 3M property, marked by a fence seen on aerial photos, falls approximately 70 metres from the common lot line. The

closest edge of the apartment building falls 232 metres from the closest part of the 3M Canada facility. Therefore, the proposed apartment would be located within the 300 metre separation distance required for a Class III facility. The setback would be measured to the building. Section 4.4.4 of the D-6 Guide speaks to Ancillary Land Uses stating *“for sensitive land uses, where the established use of on-site lands are not of a sensitive nature, such as a parking lot servicing a hospital, the land area comprising the parking lot may be included within the separation distance.”* For the future apartment development, the building will be located on the west side of the site, while the parking area and stormwater management features in the centre and east side of the site can be included in the separation distance.

To confirm the classification, discussions with staff from 3M were conducted where it was suggested the current facility is a Class III use. However, the current zone on the 3M property only permits Class I and II facilities. Previous staff with the Town of Perth had noted that the facility was recognized as a Class II use based on the zoning. In October of 2022, planning staff provided an opinion stating the lands were historically zoned M2 which allowed for Heavy Industry. The zoning consolidation in 2000 kept the lands in the M2 zone and included Class I and II facilities as permitted uses, but does not permit Class III industries. It was therefore deemed the 3M facility is a legal non-conforming Class III industry despite the current permitted uses of the M2 zone. Staff indicated in an email October 3rd, 2002 *“you are able to complete studies and if they note mitigation measures that can be done and can be supported through planning documents then we can recommend moving forward to Council for approval [of the consent].”*

Section 4.10 of the D-6 Guide speaks to Redevelopment, Infilling & Mixed-Use Areas. The subject property is located within the Town of Perth and is already zoned for higher density residential uses. A severance to support the future development would constitute urban redevelopment of the lot from its previous landfill use. Where it is not possible to achieve the recommended minimum separation distances of the D-6 Guide in areas where infilling, urban redevelopment and/or a transition to mixed use is taking place, several additional requirements are noted in the Guide:

Official Status (4.10.1) – Proposals for the reduction of separation distance shall be in accordance with Official Plan policy. The site is currently designated Residential Area and Environmental Protection on Schedule A of the Town of Perth Official Plan. The EP designation covers part of the lands proposed for future residential development, and is intended to recognize the floodplain area on the site. It has been established an Official Plan Amendment

will be required to support the future Site Plan application to re-designate some of the EP lands which are above the recognized flood elevation to the Residential Area designation.

The Environmental Protection Area designation consists of four sub-designations; 1) Flood Plain Constraint (FC), 2) Natural Heritage Features (NHF), 3) Provincially Significant Wetlands (PSW) and 4) Provincially Significant Shield Wetlands (PSSW). Though none are identified on the property on Schedule A to the Official Plan, it is known that part of the south side of the lot is low-lying. A topographic survey was completed to establish the flood elevation of 132.54 m, demonstrating the future development can be located outside of the flood plain lands. The applicant does not wish to proceed to Site Plan until the contaminated lands are separated by Consent from the lands to be developed. An Official Plan Amendment at this time would be premature, however, the intention is to re-designate the property to clearly delineate the floodplain elevation, bringing it into compliance with 4.10.1 of the D-6 Guide.

Zoning (4.10.2) – Applications for redevelopment, infill and mixed use proposals which put industrial and sensitive land uses together within less than the recommended minimum separation distances can be considered if the zoning is use-specific. The site has been zoned Residential Fourth Density (R4) since the zoning consolidation in 2000. Similar to the Official Plan, part of the property is zoned Environmental Protection (EP) which will require an amendment to support Site Plan. As with the Official Plan designation, the EP zone is intended to recognize the part of the property that is below the established flood elevation, which was historically mapped with aerial imagery and has now been accurately located based on a topographic survey. As part of the future Zoning Amendment, wording or conditions could be included to ensure the zoning is use-specific pursuant to 4.10.2 of the D-6 Guide.

Feasibility Analysis (4.10.3) – When a change in land use is proposed, less than the minimum separation distance may be acceptable subject to a justifying impact assessment. Mitigation measures are important when proposing reductions to the minimum separation. In addition to this justification, supporting studies have been completed to support the separation distance reduction. ORTECH Consulting Inc. was retained to complete an Odour Study, while BT Engineering completed a Noise Assessment. In order for the delegated authority to make an assessment for allowing less than the recommended separation, the following is required:

- *Detailed mapping showing the area subject to the proposed development and all industrial facilities and any other sources of adverse effects (e.g. rail lines).*

ZanderPlan Inc. has completed a conceptual site plan sketch showing the proposed development of the property which was submitted to the consultants who completed the additional studies. As part of the Odour Study, ORTECH did an inventory of all industrial land uses which could impact the new sensitive use, identifying if any adverse impacts were present during the site visit.

- *Mapping shall also indicate all vacant properties currently zoned and/or designated for industrial use along with relevant excerpts from the official plan and/or zoning by-law to indicate the full range of permitted uses. Attempts shall also be made to predict the types and levels of adverse impact that would result in a "worst case scenario" should an industrial use be developed upon any of the vacant parcels.*

As part of the odour study, the surrounding area was assessed indicating seven facilities were in proximity to the subject property: three facilities were closed, and two facilities were assigned to Class I under Guideline D-6. The Shandex Personal Care facility had a strong downwind odour but is approximately 850 m separation distance from the proposed development. 3M was the only existing facility deemed to have potential impacts. The zoning mapping for the Town identifies three additional vacant properties zoned for Industrial Uses. All are 1 acre or less in size and all are located further from the proposed development than 3M Canada. It is unlikely any of the three sites could support anything above a Class I industry.

- *Assessment of the types and levels of contaminant discharges being generated by current industrial facilities, including those associated with transportation facilities which serve the industries.*

A Noise Assessment was completed to review the ambient sound levels, including noise impacts from stationary sources from the 3M site. Due to the level of vegetation on the subject property and its mitigating effect on noise, the sampling was conducted on the Rideau Christian Fellowship property, concluding the site will not exceed the MECP 55 dBA daytime sound level criteria. The Odour Study included a review of the Amended Environmental Compliance Approval for 3M concluding the reduced separation will not result in adverse impacts on the new residential use for several reasons:

- a) The plant has venturi scrubbing and dust collectors to mitigate odour and particulate air emissions
- b) The plant has a high temperature Thermal Oxidizer to mitigate odorous solvent air emissions

- c) The Thermal Oxidizer has a minimum recorded operating temperature of 843°C or higher
 - d) The Thermal Oxidizer undiluted exhaust gas organic compound concentration must not exceed 100ppmv
 - e) Any air quality complaints must be recorded and retained for five years
 - f) Complaints must be investigated, and mitigation applied to minimize repeat complaints
 - g) Source testing for odour and particulate matter is not required by the MECP via the ECA, indicating that air quality emissions from the plant are not a concern
- *Based upon actual and anticipated impacts, necessary mitigative measures should be identified based upon technical assessments. Noise and other technical studies shall be submitted to appropriate Ministry staff for review. See Sections 4.6 "Studies" and 4.7, "Mitigation" for more details.*

Based on the completed studies, it has been determined the proposed development at a reduced separation could be supported without any required mitigation measures. Vegetation will be maintained to the greatest extent possible during and after development to provide a buffer to the industrial use. Further to that, no mitigation is required to support the proposal.

- *An indication shall be given as to the methods by which the mitigative measures (approved by the land use authority) will be implemented, i.e. the types of agreements that must be entered into. See Section 4.8, "Legal Agreements" also.*

Other than ensuring the new sensitive use is established on the west side of the subject property there are no identified mitigation measures to implement. A Site Plan Control agreement will be required to support the high density residential use that is proposed on the site, and any additional information or awareness clauses can be included in that document.

- *Where mitigative measures are to be applied off-site to an existing industrial facility, the proponent shall demonstrate that the industrial facility has no objection to the proposed use or to the addition of the necessary mitigative measures. Implementation of approved mitigation measures shall be required as a condition of draft approval.*

No off-site mitigation is proposed.

- *Proponents should demonstrate to the approving authority that no objections to the proposed use have been raised by area residents, industries, etc. See Section 4.10.5, "Public Consultation".*

As part of the Consent process, neighbouring residents, including 3M Canada, will be circulated on the application to meet the requirements of the *Planning Act*. This would constitute public consultation for the Consent.

New Use of Existing Buildings (4.10.4) – There are no existing buildings to be re-used.

Public Consultation (4.10.5) – As stated, the Consent application will include public consultation as will any future Official Plan and Zoning Amendment applications. Ample opportunity will be provided for public inclusion throughout the process. Given 3M is an abutting property they will also be circulated for comments pertaining to the severance.

Environmental Warnings for Sensitive Land Uses (4.10.6) – Any decisions on planning applications relating to the development of the site could include notes or clauses speaking to environmental warnings. Notes and clauses are typically seen on Consent decisions, and can be included in a future Site Plan Control agreement on the subject property.

Phased/Sequential Development (4.10.7) – No phasing in of sensitive uses or phasing out of industrial uses is included in the proposal. If the future site plan is approved for the new apartment it will be constructed in one phase.

Site Clean-up & Decommissioning (4.10.8) – A Phase I and II ESA and a Record of Site Condition have been completed in support of the Consent Application. The purpose of the Consent is to separate the remaining contaminated lands from the lands to be developed. The retained parcel has been fully remediated.

Overall, the Consent Application and future development of the subject property with a residential apartment building can be supported from a land use compatibility perspective. Supporting studies have demonstrated no potential adverse impacts on the new sensitive use from the 3M facility. The proposal meets all relevant criteria of the D-6 Guide for the reduction of separation distances as outlined in Section 4.10 of the guide. The proposal is consistent with the policies of the D-6 guidelines.

COUNTY OF LANARK SUSTAINABLE COMMUNITIES OFFICIAL PLAN (SCOP)

The subject property is designated Settlement Area with a Flood Plain Overlay on Schedule A – Land Use to the Lanark County Sustainable Communities Official Plan, and as seen on the

County's GIS mapping (See Figure 4). The Flood Plain Overlay has a similar orientation to the EP zoning as seen on the Town of Perth Zoning Schedule for the property. There are no Source Water Protection areas identified on or abutting the subject property pursuant to Schedule B of the County of Lanark Sustainable Communities Official Plan.

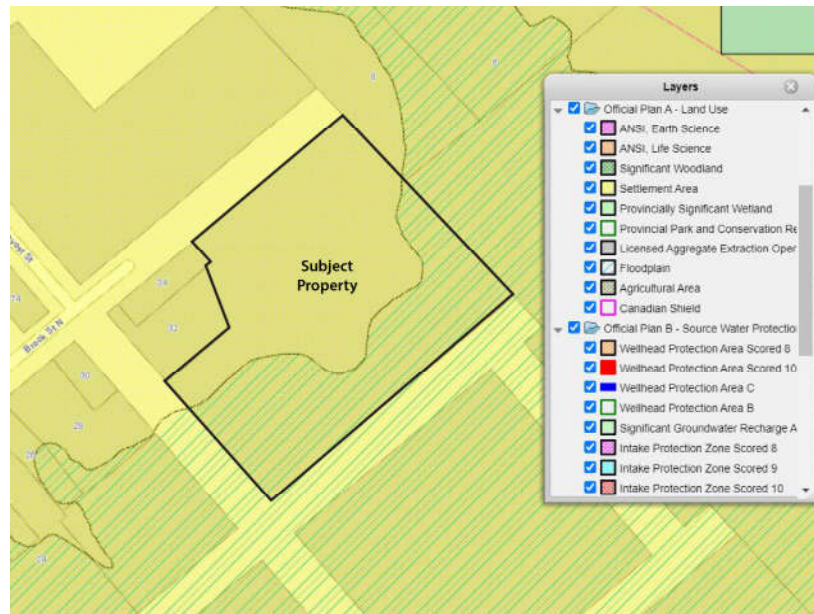


Figure 4 – County of Lanark GIS Mapping Showing Official Plan Schedule A

Section 2.0 of the Lanark County Official Plan sets forth policies and objectives for Settlement Areas. It is an objective within the Official Plan that Settlement Areas *“are intended to create a planning framework which will encourage and support diversified, mixed use settlement areas which have developed on the basis of full or partial municipal services or which are planned population centres to be developed on the basis of sustainable private services”*. The subject site falls within the Settlement Area of Perth, providing for a mix of affordable housing options / units on full municipal services. The proposed development will not affect the limits of the settlement area as identified on Schedule A of the Town’s Official Plan (Sec. 2.3.1.1). The subject property is currently vacant with surrounding residential lots supporting lower densities. The proposed Consent will provide sufficient land for a broad range of uses to meet future growth and demands (Sec. 2.3.1.2). The proposed lots can be developed on municipal sewer and water services, consistent with other lots in the Town of Perth, and will adhere to the appropriate land use policies (Sec. 2.3.1.3). The lands are designated Residential within the Town of Perth Official Plan supporting the creation of new residential uses to meet the needs of current and future residents (Sec.2.3.1.6). The proposed Consent is consistent with the General Settlement Area Policies of the County of Lanark Official Plan.

Section 2.6 of the County Official Plan speaks to Settlement Area Land Use Policies. The Consent application will result in utilization of available residential land to provide new medium density housing on municipal services (Sec. 2.6.1.2). Provost Street will be extended to provide adequate road access and extend municipal servicing to the retained parcel (Sec. 2.6.1.4). The severed lands will contain the remnants of the old landfill and would not result in the need for road frontage / access. The Consent application will result in lot creation for new residential uses near Algonquin College and within a kilometre of existing commercial and employment uses in Perth's Downtown, contributing to a mix of land uses in the area (Sec. 2.6.1.5). The Consent is consistent with the Settlement Area Land Use Policies of the Lanark County Sustainable Communities Official Plan.

Section 4.0 of the County Official Plan speaks to Infrastructure Policies, dealing with things like roads, bridges, structures and railway lines required for transportation services. The extension of new transportation, servicing, and communication infrastructure to the retained parcel will ensure future growth is environmentally, socially and economically sustainable (Sec. 4.2). Provost Street will be extended to provide access to the retained parcel. Development is directed to an existing community where extension of water and waste water services can be reasonably extended (Sec. 4.4.1.2). The proposed Consent is consistent with the Infrastructure Policies of the County Official Plan.

Section 5.0 of the Lanark County Official Plan speaks to Natural Heritage including wetlands, woodlands, areas of natural and scientific interest (ANSI's), fish habitat, wildlife habitat, the habitat of endangered and threatened species and ground and surface water resources. There are no natural heritage areas or features identified on or abutting the property that would be impacted by the Consent. Some of the southern portion of the property is below the 1:100 year flood line as established by an Ontario Land Surveyor, however, all development will occur above this elevation on the retained parcel.

Section 6.0 of the County Official Plan speaks to resources such as agricultural areas, minerals, and mineral aggregates. The lands to be severed are located within the Settlement Area of Perth and are not located on or within any known resource areas. New residential development would not negatively impact any existing resource areas within the County.

Section 7.0 of the County Official Plan speaks to Public Health and Safety with policies for hazardous lands including both natural and man-made hazards. The site has some low-lying areas to the south side which could have the potential for flooding. The flood plain contour has been identified by survey. Development of the retained parcel will occur above the flood

elevation and can include floodproofing requirements if deemed necessary. Contamination of the site has been noted from a previous land fill. An Environmental Site Assessment has been completed along with a Record of Site Condition. The contaminated lands on the retained parcel have been remediated with monitoring wells installed to assess potential future impacts from the contaminated areas on the severed parcel. The new uses are well separated from any waste disposal sites or aggregate operations. Compatibility with nearby uses has been demonstrated in this report. Overall, the retained lands do not contain any features or areas that would affect Public Health and Safety.

Overall, the proposed Plan of Subdivision meets the intent and is consistent with the policies of the Lanark County Sustainable Communities Official Plan.

TOWN OF PERTH OFFICIAL PLAN

The subject property is designated Residential Area and Environmental Protection Area on the Town of Perth Official Plan Schedule A - Land Use Designations (See Figure 4). The Environmental Protection Area designation in the Plan consists of four sub-designations; 1) Flood Plain Constraint (FC), 2) Natural Heritage Features (NHF), 3) Provincially Significant Wetlands (PSW) and 4) Provincially Significant Shield Wetlands (PSSW). Despite the EP designation on the site, it is notable that Schedule A does not identify any sub-designations on or abutting the subject property.

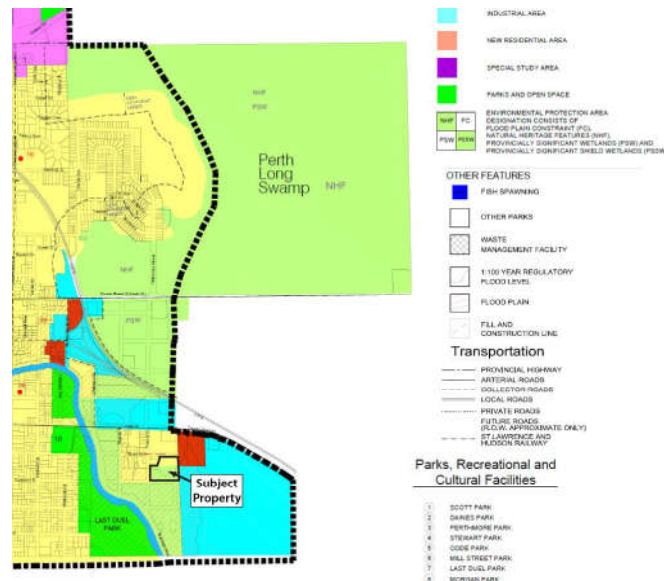


Figure 4 – Town of Perth Official Plan Schedule A

For the purposes of this feasibility / land use compatibility analysis, the assessment of Official Plan Policy will be limited to applicable Consent provisions and any land use compatibility provisions in order to support the severance application. Given a Planning Report will be required for any future Official Plan Amendment, a full assessment of Official Plan policy can be completed at that time. This report will focus on policy relating to the Consent approval.

Section 3.2 of the Official Plan speaks to Housing. The proposed Consent application will facilitate the future development of a residential apartment on the property. Land supply for the Town will be met through a combination of intensification, redevelopment and greenfield development (Sec. 3.2[A]). Redevelopment of the lands (from the previous landfill use) would be appropriate to meet the housing goals of the Town. Intensification and redevelopment will be focused on the downtown, converted institutional buildings, second units in dwellings and large lots in established residential neighborhoods. The subject property is a large lot at the edge of an established residential neighbourhood which is already zoned for higher density uses. The Plan aims to increase the supply of affordable housing and housing which meets particular needs such as garden suites, group homes, and student housing (Sec. 3.2[C]). The proposed apartment will include affordable housing options and small housing units geared towards students of the nearby Algonquin College. The Consent to support future residential development is consistent with the Housing policies of the Official Plan.

Section 4.0 of the Official Plan speaks to Economic Development with a Mission Statement *“to advance local economic development and tourism through activities and actions which will help retain existing enterprise, organizations and services as well as encourage economic growth”* (Sec. 4.2). A Consent application to support future development of a new apartment geared toward providing student and affordable housing options will allow for lower income individuals / households to allocate less money to accommodation and housing freeing up more funds for investment in local economy. Construction activities related to the new use will allow for investment in local business to complete the construction tasks. Existing enterprises including 3M Canada can be retained to encourage economic growth.

Section 5.0 of the Official Plan provides Functional Support Policies with Sewage and Water provisions found under Section 5.2. All new development on the subject property will be serviced by municipal water and sewer services (Sec. 5.2(A)) which will be extended down Provost Street. The Consent to support a new apartment dwelling consisting mainly of smaller bachelor and one-bedroom options with lower occupancies should result in decreased water consumption compared to larger units (Sec. 5.2(C)). A water storage tank will be placed on the property for emergency use to supplement water demands in the event of a fire.

Section 5.3 of the Official Plan outlines Stormwater Management and Drainage. A rain garden is proposed on the east side of the property for stormwater management rather than relying on end-of-pipe quality control (Sec. 5.3(A)). The rain garden is quite large, allowing for natural infiltration (Sec. 5.3.C.2) which will direct flows away from the lower-lying areas on the south side of the property and the Tay River further south (Sec. 5.3.C.4). Monitoring wells have been installed to monitor water quality for the site (Sec. 5.3.C.8). These wells are meant for monitoring the water near the former landfill but could potentially be used to collect data relating to the effectiveness of the SWM features which are proposed.

Section 5.5 of the Official Plan speaks to Transportation. Extension of Provost Street on the west side of the property will provide the development with a safe and functional connection to existing streets to be used for both motorized and non-motorized transport (Sec. 5.5(A)). Given the proposal exceeds 30 residential units, a Traffic Impact Study has been prepared to assess any potential impacts from the development (Sec. 5.5(E)). Both an outdoor bicycle rack and a separate accessory structure for bicycle storage are proposed to promote use of bicycles and encourage active transportation (Sec. 5.5.F.1).

Section 6.0 of the Official Plan speaks to Heritage and the preservation of the Town's heritage resources and cultural features. The subject property does not contain any identified heritage features within the Town of Perth. Its area does not mark any significant cultural or archaeological resource for the Town. Development of the property would not affect any heritage features in accordance with the Official Plan.

Section 7.0 of the Official Plan speaks to Public Health and Safety pertaining to a variety of natural and man-made hazards including flood prone lands, contaminated sites, noise and vibration (Sec. 7.1). All of these conditions affect the proposed development. Section 7.3 speaks to the Environmental Protection Area designation which includes:

- 1. Lands within the 1: 100 regulatory flood level (flood plain and flood plain constraint);*
- 2. Lands characterized by a Natural Heritage Feature such as Provincially Significant wetlands and wildlife habitat [see Section 8.5.4 b.).*
- 3. Any update to the Plan will add to this designation areas of unstable soils, slopes or areas of forest types for wildland fires where they are identified.*

Pursuant to Figure 4 of this report, the Environmental Protection Area designation on the property does not follow the line identifying the flood plain constraint. The EP designation is shown as a straight line across the property with the northern portion of the site designated

Residential. The flood plain contour was surveyed by an OLS and shown to be significantly different than the boundary of the Environmental Protection Area designation on the Official Plan Schedule. No natural heritage features are present above the flood line and no areas of unstable soils, slopes, or areas subject to wildland fire are present on the property. All new buildings, associated parking and stormwater management are proposed outside of the flood plain on-site (Sec. 7.3.2.4).

Section 7.4 of the Official Plan speaks to Contaminated Lands which were present on part of the lands stemming from an old landfill. Proper decommissioning and clean-up of the site was undertaken (Sec. 7.4.2a) and a Record of Site Condition was filed (Sec. 7.4.2.a.2). A Phase I and II ESA has been completed in accordance with Ontario Regulations in support of the Consent application (Sec. 7.4.2.a.3). All necessary work to remove the contamination and monitor future impacts has been completed in support of the severance and future apartment dwelling.

Section 7.5 of the Official Plan speaks to Noise and Vibration. The site is located adjacent to a Class III industrial facility and may be subject to noise impacts from the use. A Noise Study has been completed to assess any stationary noise sources including equipment associated with the abutting industrial use. The Noise Assessment showed the site will not exceed the MECP 55 dBA daytime sound levels. The Noise Study will be provided with the Consent application.

Section 8.0 of the Official Plan speaks to Designation and Development policies with Residential Area policies found under Section 8.1. The intent of the Official Plan is *“to develop new neighbourhoods with a mix of housing types designed to meet a range of housing needs”* (Sec. 8.1.1a) providing for a mix of housing types and densities (Sec. 8.1.1c). The site is already zoned for an apartment use and development will be setback from existing lower density uses to ensure compatibility (Sec. 8.1.1c). Residential intensification and infill development on larger and vacant lots will be permitted when consistent with residential design principles (Sec. 8.1.1g). The site would be suitable for the development of a residential apartment, with design and other site details to be addressed through the Site Plan Control process.

Residential Area Designation policies are located under **Section 8.1.3** of the Official Plan. The proposed apartment dwelling will consist of a mix of residential units ranging from Bachelor style apartments to 3-bedroom units, providing affordable housing options in close proximity to Algonquin College (Sec. 8.1.3.1a). The new infill project will require a new road connection and servicing extensions but will connect to the existing road network and municipal servicing located at the Provost Street and Brock Street intersection (Sec. 8.1.3.1c). The proposal is ground oriented consisting of three storeys (Sec. 8.1.3.1d) and the built form, massing and

profile will be compatible with surrounding lower density uses based on separation distances and natural vegetation (Sec. 8.1.3.1e). The Official Plan permits a range and mix of housing types and densities requiring medium and high density housing types, notably apartments, to be designed to include a mix of bachelor, one, two and three bedroom units (Sec. 8.1.3.2.1). The proposal would be permitted and would meet the Residential Area designation objectives outlined in the Official Plan.

The subject property is a vacant parcel of land partially designated for residential purposes. Part of the property is in the Environmental Protection Area designation. While it is understood that this designation is intended to recognize and protect a variety of natural heritage features such as floodplains, the floodplain featured on the subject property has not been accurately mapped on the Town's Official Plan Schedules. A future Official Plan Amendment is proposed to re-designate all of the lands above the surveyed flood elevation to Residential. Environmental Protection Area policies will be outlined in a future planning report for the Official Plan Amendment.

Section 9.12.15 of the Official Plan speaks to Subdivisions, Consents and Part-Lot Control. Consent policies are found under Section 9.12.15.2. Prior to submission of the Consent application pre-consultation with staff was completed (Sec. 9.12.15.2[a]). In Lanark County local municipal staff are required to review and sign the front page of all Consent applications prior to submission. This was provided by Town staff at the time of submission of the application to Lanark County. A sketch was submitted showing the severed and retained lands will all applicable dimensions and information on existing features (Sec. 9.12.15.2.2). The residential apartment is permitted in the underlying land use designation, subject to re-designation of the EP lands which are improperly mapped on the property (Sec. 9.12.15.2.3). The application is supported by a number of studies for development adjacent to an industrial facility (Sec. 9.12.15.2.6).

Overall, the proposed Consent application meets the intent and is consistent with the policies of the Town of Perth Official Plan. A future Official Plan Amendment will be required to re-designate some of the EP lands on the site, to accurately reflect the boundary of the floodplain, in order to support residential development.

TOWN OF PERTH COMPREHENSIVE ZONING BY-LAW No. 3358

The subject property is zoned Residential Fourth Density (R4) and Environmental Protection (EP) in the Town of Perth Comprehensive Zoning By-Law No. 3358 (See Figure 5). Of note, the boundary of the EP zoned lands follows a significantly different boundary than the EP designation on Schedule A of the Official Plan, as seen in Figure 4 earlier in this report. The difference in mapping between the documents clearly demonstrates that actual EP lands are not correctly identified for this parcel. It is understood that the boundary of the EP zone and designation is intended to reflect the floodplain area; however, this has not been accurately mapped in either the Official Plan or the Zoning By-law.

The existing parcel of land does not have any built road frontage, although it abuts two street allowances; it is landlocked. A future street extension is proposed to provide frontage for the retained parcel, but no built frontage is proposed for the severed lot.



Figure 5 – Zoning of the Subject Property
(Derived from the Town of Perth GIS Mapping)

Section 4 of the Zoning By-Law sets forth General Provisions for development within the Town of Perth. **Section 4.13** speaks to Flood Plain policies, prohibiting filling or excavation within flood plain areas. The flood plain contour has been established on the property by an Ontario Land Surveyor. No development or site alteration is proposed within the flood plain.

Section 4.13 of the Zoning By-Law speaks to Flood Plain stating that modification through filling, excavation or other means is not permitted unless approved by the Rideau Valley Conservation Authority. No development is proposed below the flood plain contour line derived by the Ontario Land Surveyor. The proposal would not seek any of the permitted uses within the flood plain pursuant to 4.13.1. All development will be directed outside of the flood plain.

Section 4.14 of the Zoning By-Law speaks to Frontage on and Access to a Public Street and Exemptions. No building or structure shall be constructed on a lot unless the lot has the minimum frontage on a public street or is a legal non-complying existing lot (Sec. 4.14.1). The property has existed in this configuration prior to the passing of the most recent Zoning by-law, making it a legal non-complying existing lot. The Consent will result in the loss of the legal non-complying status. The retained parcel will be provided the minimum lot frontage through a future road extension of Provost Street. The severed lot is proposed to remain without built road frontage. It contains a former landfill with no development potential of any kind, therefore there is no reason to provide the severed lot with frontage on Brock Street.

Section 4.14.2 lists several uses exempt from providing the road frontage, but the use of the severed lot would not fit those examples. Pursuant to Section 4.14.3[b] an agreement can be entered into for access via an unopened or closed road allowance which could be used to provide access to the severed parcel without the need to establish road frontage. Additionally, the unopened road allowance goes directly into the side of the Rideau Christian Fellowship property. The road allowance ends at the east side of the subject property. A new road extension along Brock Street would not provide any additional properties with frontage. An agreement for access via the unopened road allowance would be the most suitable for the severed lot.

Section 4.30 of the Zoning By-Law speaks to Minimum Distance Separation. There are no nearby Waste Management Facilities pursuant to 4.30.1. Future development of the retained parcel will result in a new residential use closer than 300 metres separation (Sec. 4.30.2[c]) to the 3M facility to the east, measured from building to building (Sec. 4.30.2[d]) for the vacant parcel. Supporting studies have been completed to support the new residential use closer than 300 metres to the facility. A reduction of the setback will be required as part of a future zoning amendment. The proposed Consent will not result in the construction of the new use, only the creation of the new lot. As a zoning amendment and site plan control are required, the reduction does not need to be recognized as a condition of the Consent Application.

Section 9 of the Zoning By-Law speaks to the Residential Fourth Density (R4) zone which includes apartment dwellings as permitted uses (Sec. 9.1). The proposed apartment dwelling on

the retained parcel can meet all applicable zone requirements as set forth in Section 9.2 with the exception of lot frontage. The extension of Provost Street will provide the necessary 7.5m lot frontage for the retained parcel once built. The severed lot will measure 0.417ha in size with the retained measuring 1.036ha in size. The R4 zone does not have minimum lot area requirements for vacant parcels; lot area is based on number of residential units proposed. The retained lands are well in excess of the minimum lot area to support future development.

Section 21.0 of the Zoning By-Law speaks to the Environmental Protection zone shown on part of the property. Based on the understanding part of the south end of the property is low-lying flood plain area, the presence of the EP zoned lands is consistent with the site characteristics; however, the Zone line does not follow the surveyed flood plain contour as established by RVCA. It is a reasonable interpretation that the intent of the EP zone is to delineate the floodplain area for protection, and not to prohibit development on the higher R4 zoned lands. A future Zoning Amendment to support site plan may be required. For the purpose of the Consent a rezoning should not be required as a condition, as there is still reasonable buildable area on the retained lot to support development.

SUPPORTING STUDIES – NOISE ASSESSMENT

A noise assessment was completed in support of the Consent application and future residential use of the property by BT Engineering March 1, 2023. The stationary sound level reading was taken at the back of the Rideau Christian Fellowship property slightly closer to the 3M facility, given the wooded nature of the subject property would not be reflective of the final construction conditions on-site. The adjacent lot had minimal noise attenuation features providing a better overall reading for the 3M facility. The 1-hour daytime sound level was recorded at 48.4dBA during peak traffic on County Road 43. The noise generation along the road is not anticipated to increase significantly, and it was concluded the subject property would not exceed the 55dBA daytime sound level criteria. BT Engineering concluded the development would not require additional sound attenuation.

SUPPORTING STUDIES – AIR QUALITY ASSESSMENT

An Air Quality Assessment was completed in support of the Consent Application by ORTECH Consulting Inc. in February of 2023. A site visit was conducted January 18, 2023 extending 1000 metres out from the subject property. Of the various industrial uses observed, only the 3M

plant was deemed capable of producing potentially adverse impacts on the proposed development of the retained parcel.

ORTECH notes the 3M Canada plant currently operates under Amended Environmental Compliance Approval, Air (ECA) No. 4950-8XLN4A. ORTECH reviewed this ECA to determine if the proposed separation distance for future development of the retained lot was likely to result in adverse air quality effects at the development. Relevant comments about the review are summarized below:

- a) The plant has venturi scrubbing and dust collectors to mitigate odour and particulate air emissions
- b) The plant has a high temperature Thermal Oxidizer to mitigate odorous solvent air emissions
- c) The Thermal Oxidizer has a minimum recorded operating temperature of 843°C or higher
- d) The Thermal Oxidizer undiluted exhaust gas organic compound concentration must not exceed 100ppmv
- e) Any air quality complaints must be recorded and retained for five years
- f) Complaints must be investigated, and mitigation applied to minimize repeat complaints
- g) Source testing for odour and particulate matter is not required by the MECP via the ECA, indicating that air quality emissions from the plant are not a concern

It is concluded from the actual separation distance and the conditions of Amended Environmental Compliance Approval, Air No. 4950-8XLN4A that the 3M Canada plant will not cause adverse odour or dust effects at the proposed development under normal plant operations. ORTECH recommended approval of the Consent Application.

SUPPORTING STUDIES – ENVIRONMENTAL IMPACT STATEMENT AND TREE CONSERVATION REPORT

GEMTEC Consulting Engineers and Scientists Limited (GEMTEC) was retained by the applicant to carry out an Environmental Impact Statement (EIS) and Tree Conservation Report (TCR) in support of the proposed Consent and future development of the land. Field investigations were completed in the summer of 2022. Natural heritage features were identified on-site or within the study area including local wetlands, and the following candidate significant wildlife habitat: special concern and rare wildlife habitat (eastern woodpecker). The following SAR and their

habitat were identified as having a potential to occur on-site: eastern small-foot myotis, little brown myotis, tri-colored bat, and Blanding's turtle. Regulated Category 3 habitat was identified on-site for Blanding's turtle. No butternut trees were observed on-site.

Gemtec reviewed the Perth Official Plan and Zoning By-laws for the environmental protection zones identified. Following the site investigation and completion of this EIS report, it is GEMTECs opinion that the Environmental Protection zoning for the property was drawn in association with the 1:100 year regulatory floodplain mapping. The most recent survey of the property identified the 132.49 contour as the most current mapping of the 1:100 year floodplain on-site. Habitat outside of the floodplain elevation (132.49 contour) is not considered to require environmental protection zoning. It is recommended in the EIS that the Environmental Protection Zoning be amended to follow the updated survey of the floodplain elevation (132.49 contour). The updated floodplain elevation (132.49 contour) will protect portions of the on-site woodlands for eastern wood-pewee, as well as the entirety of the meadow marsh local wetland.

Mitigation measures relating to Local Wetlands, Floodplain, Significant Wildlife Habitat, Species at Risk, and Wildlife are found in Section 7 of the EIS. The conclusion of the report is provided that mitigation measures recommended in Section 7 are implemented as proposed, no significant residual impacts are anticipated from the proposed development. The following general conclusions are provided by GEMTEC in regards to the Environmental Impact Statement.

- No significant impacts to natural heritage features identified on-site, including local wetlands, significant woodlands, significant wildlife habitat or habitats of species at risk are anticipated as a result of future residential development.
- The proposed project complies with the natural heritage policies of the Provincial Policy Statement.
- The proposed development complies with the natural heritage policies of the Lanark County Official Plan and the Town of Perth Official Plan.

SUMMARY

A Consent application is proposed for the vacant parcel located near the intersection of Brock Street and Provost Street in the Town of Perth. The severances will separate a 0.417ha parcel of land containing remnants of an old land fill from the remainder of the property, to support

future residential development on the retained parcel. The lands are currently landlocked with no built frontage having existed in this configuration since the passing of the most recent Zoning By-Law for the Town of Perth, making them legal non-complying with respect to lot frontage. Future development of the retained parcel will be provided via a road extension for access and servicing; no servicing or built road frontage is proposed for the severed lot. The Town's Zoning By-Law permits agreements for access via unopened and closed road allowances.

The proposed Consent is consistent with and meets the intent of the Provincial Policy Statement (PPS) 2020, the Lanark County Sustainable Communities Official Plan, the Town of Perth Official Plan and Zoning By-Law, and the D-6 Guidelines for Industrial Separation.

Should you have any further questions please do not hesitate to contact the undersigned.

Sincerely,



Tracy Zander, M.Pl, MCIP, RPP



Chris Clarke, B.Sc., CPT