

PLANNING REPORT

TO: PLANNING ADVISORY COMMITTEE

FROM: BRENDA GUY
MANAGER OF PLANNING AND DEVELOPMENT

MEETING DATE: TUESDAY, JULY 28, 2026

SUBJECT: SD2025-01 – MHBC PLANNING LTD - PLAN OF SUBDIVISION
DP2026-04 - MHBC PLANNING LTD – DEVELOPMENT PERMIT
- OWNER: 1000989284 Ontario Inc.

BACKGROUND

Property: Vacant land south of Elmwood Drive and east/west of Arthur Street

Legal Desc: Leeds Con.1 Pt. Lot 16 RP 28R-15673 Parts 1 to 25, Town of Gananoque

Acreage: Approximately 11.6 ha (28.66 acres)

Lot Coverage: 35% Maximum Coverage

Official Plan: Residential

DP Designation: Residential

PURPOSE AND EFFECT

The applicant has applied for a Plan of Subdivision on vacant lands consisting of 66 single family dwelling lots and 5 blocks of multi-residential (35-37) for a proposed total of 101 dwelling units.

This report addresses the application for a Plan of Subdivision under Section 51 of the Planning Act (see Attachment 1 – Approval Process). Draft Plan approval is issued prior to the creation of individual lots for the purposes of ensuring the applicant is able to meet the criteria outlined in the Planning Act and includes the Provincial Planning Statement, Official Plan and Development Permit Bylaw.

Draft Plan approval additionally provides the applicant a minimum of three years to fulfill any reasonable conditions. Upon all conditions being met, the applicant may proceed to registration of the subdivision/agreement and creation of individual lots.

Supporting documentation received in regards to the proposed plan include:

Plan of Subdivision Application SD2025-01

Development Permit Application DP2026-04

Concept Plan - June 2026

Draft Plan dated May 28, 2026

Planning Justification Report - September 17, 2025 and Addendum - June 2, 2026

Archaeology – Stage 1-2, 3 (Connor and Jasper Site)

Enhanced Wetland FIG.7 – May 2026

Environmental Impact Assessment - August 29, 2025 and Addendum - June 2, 2026

Geotechnical Report - May 28, 2026

Sanitary Service Report - May 2026

Stormwater Management Report - May 2026

Traffic Impact Study - August 26, 2025 and Addendum - June 2026

Water Supply Report - May 2026

Wetland Evaluation - October 28, 2025

SITE BACKGROUND

The lands are located south of Elmwood Drive, east and west of Arthur Streets, east of John Street and abuts the St. Lawrence River to the south.

Road connections are proposed to Elmwood Drive, Arthur Street (east) and John Street (west) with two cul-de-sacs within the development.

The lands are designated residential in both the Town's Official Plan and Development Permit By-law. The lands have historically remained vacant and include a number of natural features including wetlands, streams, unstable slopes in addition to the residential designation.

DISCUSSION

Planning Act

The Province sets out matters of provincial interest that the Minister, Council, Planning Advisory Committee and the Tribunal shall have regard to when undertaking land use planning matters under the Planning Act (see Attachment 2).

The Subdivision of land is regulated by Part VI "Subdivision of Land" of the Planning Act, R.S.O. 1990, c.P.13. Section 24 of *The Planning Act* establishes the criteria for the review of Plan of Subdivision Applications.

In considering a draft plan of subdivision, regard shall be had, among other matters, to the health, safety, convenience, accessibility for persons with disabilities and welfare of the present and future inhabitants of the municipality and to,

- (a) the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;
- (b) whether the proposed subdivision is premature or in the public interest;

- (c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;
- (d) the suitability of the land for the purposes for which it is to be subdivided;
- (d.1) if any affordable housing units are being proposed, the suitability of the proposed units for affordable housing;
- (e) the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;
- (f) the dimensions and shapes of the proposed lots;
- (g) the restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;
- (h) conservation of natural resources and flood control;
- (i) the adequacy of utilities and municipal services;
- (j) the adequacy of school sites;
- (k) the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;
- (l) the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy; and
- (m) the interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated under subsection 41 (2) of this Act or subsection 114 (2) of the *City of Toronto Act, 2006*.

Provincial Planning Statement 2024

The Provincial Planning Statement provides overall policy directions on matters of provincial interest related to land use planning and development in Ontario.

Note: The Provincial Planning Statement 2024 (PPS) "*The Provincial Planning Statement is more than a set of individual policies. It is to be read in its entirety and the relevant policies are to be applied to each situation. When more than one policy is relevant, a decision-maker should consider all of the relevant policies to understand how they work together. The language of each policy, including the Implementation and Interpretation policies, will assist decision-makers in understanding how the policies are to be implemented.*"

Key relevant policies will be discussed in this section.

2.1 Planning for People and Homes

6. Planning authorities should support the achievement of *complete communities* by:
- a) accommodating an appropriate range and mix of land uses, *housing options*, transportation options with *multimodal* access, employment, *public service facilities* and other institutional uses, recreation, parks and open space, and other uses to meet long-term needs;

- b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and
- c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.

2.2 Housing

1. Planning authorities shall provide for an appropriate range and mix of *housing options* and densities to meet projected needs of current and future residents of the *regional market area*.

2.3 Settlement Areas and Settlement Area Boundary Expansions

- 1. *Settlement areas* shall be the focus of growth and development. Within *settlement areas*, growth should be focused in, where applicable, *strategic growth areas*, including *major transit station areas*.
- 3. Planning authorities shall support general *intensification* and *redevelopment* to support the achievement of *complete communities*.
- 4. Planning authorities shall establish and implement minimum targets for *intensification* and *redevelopment* within built-up areas, based on local conditions.

3.1 General Policies for Infrastructure and Public Service Facilities

- 1. *Infrastructure* and *public service facilities* shall be provided in an efficient manner while accommodating projected needs.
- 3. *Infrastructure* and *public service facilities* should be strategically located to support the effective and efficient delivery of emergency management services, and to ensure the protection of public health and safety.

3.3 Transportation and Infrastructure Corridors

- 1. Planning authorities shall plan for and protect corridors and rights-of-way for *infrastructure*.

3.6 Sewage, Water and Stormwater

- 2. *Municipal sewage services* and *municipal water services* are the preferred form of servicing for *settlement areas* to support protection of the environment and minimize potential risks to human health and safety.

3.9 Public Spaces, Recreation, Parks, Trails and Open Space

- 1. Healthy, active, and inclusive communities should be promoted by:
 - a) planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities;
 - b) planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation;
 - c) providing opportunities for public access to shorelines; and
 - d) recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas.

4.1 Natural Heritage

1. Natural features and areas shall be protected for the long term.
2. The diversity and connectivity of natural features in an area, and the long-term *ecological function* and biodiversity of *natural heritage systems*, should be maintained, restored or, where possible, improved, recognizing linkages between and among *natural heritage features and areas, surface water features and ground water features*.
3. *Natural heritage systems* shall be identified in Ecoregions 6E & 7E¹, recognizing that *natural heritage systems* will vary in size and form in *settlement areas, rural areas, and prime agricultural areas*.
4. *Development and site alteration* shall not be permitted in: b) *significant coastal wetlands*.
5. *Development and site alteration* shall not be permitted in *significant wildlife habitat, significant areas of natural and scientific interest; and coastal wetlands* in Ecoregions 5E, 6E and 7E1 unless it has been demonstrated that there will be no *negative impacts* on the natural features or their *ecological functions*.
6. *Development and site alteration* shall not be permitted in *fish habitat* except in accordance with *provincial and federal requirements*.
7. *Development and site alteration* shall not be permitted in *habitat of endangered species and threatened species*, except in accordance with *provincial and federal requirements*.
8. *Development and site alteration* shall not be permitted on *adjacent lands* to the *natural heritage features and areas* identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the *ecological function* of the *adjacent lands* has been evaluated and it has been demonstrated that there will be no *negative impacts* on the natural features or on their *ecological functions*.

4.2 Water

1. Planning authorities shall protect, improve or restore the *quality and quantity of water*:
 - a) using the *watershed* as the ecologically meaningful scale for integrated and long-term planning;
 - b) minimizing potential *negative impacts*;
 - c) identifying *water resource systems*;
 - d) maintaining linkages and functions of *water resource systems*;
 - f) planning for efficient and sustainable use of water resources; and
 - g) ensuring consideration of environmental lake capacity, where applicable.
3. Municipalities are encouraged to undertake *watershed planning* to inform planning for *sewage and water services* and stormwater management, including *low impact development*, and the protection, improvement or restoration of the *quality and quantity of water*.

4.6 Cultural Heritage and Archaeology

2. Planning authorities shall not permit *development* and *site alteration* on lands containing *archaeological resources* or *areas of archaeological potential* unless the *significant archaeological resources* have been *conserved*.
4. Planning authorities are encouraged to develop and implement:
 - a) archaeological management plans for conserving *archaeological resources*; and
 - b) proactive strategies for conserving *significant built heritage resources* and *cultural heritage landscapes*.
5. Planning authorities shall engage early with Indigenous communities and ensure their interests are considered when identifying, protecting and managing *archaeological resources*, *built heritage resources* and *cultural heritage landscapes*.

5.1 General Policies for Natural and Human-Made Hazards

1. Development shall be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards.

5.2 Natural Hazards

1. Planning authorities shall, in collaboration with conservation authorities where they exist, identify *hazardous lands* and *hazardous sites* and manage development in these areas, in accordance with provincial guidance.
2. Development shall generally be directed to areas outside of:
 - a) *hazardous lands* adjacent to the shorelines of the *Great Lakes -St. Lawrence River System* and *large inland lakes* which are impacted by *flooding hazards*, *erosion hazards* and/or *dynamic beach hazards*;
 - b) *hazardous lands* adjacent to *river, stream and small inland lake systems* which are impacted by *flooding hazards* and/or *erosion hazards*; and
 - c) *hazardous sites*.
3. *Development* and *site alteration* shall not be permitted within:
 - a) the *dynamic beach hazard*;
 - b) *defined portions of the flooding hazard along connecting channels* (St. Lawrence River);
 - c) areas that would be rendered inaccessible to people and vehicles during times of *flooding hazards*, *erosion hazards* and/or *dynamic beach hazards*, unless it has been demonstrated that the site has safe access appropriate for the nature of the *development* and the natural hazard; and
 - d) a *floodway* regardless of whether the area of inundation contains high points of land not subject to flooding.
4. Planning authorities shall prepare for the *impacts of a changing climate* that may increase the risk associated with natural hazards.

Comment: The PPS provides that development shall occur within settlement areas and achieve *complete communities*. The proposed development with the range of housing sizes and housing options contributes to a complete community.

The proposed development has demonstrated that the lots can be serviced by both municipal water and sewer infrastructure with the submission of the background reports.

The proposed development has a number of natural features including coastal wetlands and unevaluated wetlands as defined in the PPS. The EIS undertook evaluations and determined that the wetland areas will be reduced but its' functionality will improve and the applied setbacks will not negatively impact.

Further review of the infrastructure and EIS will be discussed in this report.

Official Plan

As per the PPS, *the official plan is the most important vehicle for implementation of the Provincial Policy Statement. Comprehensive, integrated and long-term planning is best achieved through official plans.*

The Official Plan (OP) Vision is *“to preserve and enhance the Town’s unique ‘small town’ heritage, preserve our historic and environmental character, and provide a high quality of life through a sustainable development pattern.”* The guiding principles, developed through consultation, identifies how we are to consider land use applications - what we want to preserve, maintain, improve upon or committed to doing. Related to these applications include *“enhancing the quality of our residential neighborhoods through appropriate housing types, densities and transitions from adjoining land uses”* and planning for a *“connected system of greenways and parks facilities to serve residents and visitors”*.

The subject lands are designated Residential under Section 3.2 Where We Live – Planning Sustainable Residential Neighbourhoods of the Official Plan Policy Area. The residential policies are to preserve and consolidate existing residential neighbourhoods and provide for new residential opportunities through intensification from apartment dwellings in multi storey buildings, to single dwelling subdivisions, to mixed use buildings with local commercial, schools and residential uses.



Residential - Schedule "B"

Section 3.2.1 identifies the Goals & Objectives of our residential neighbourhoods which is to *“Promote a balanced supply of housing to meet the present and future social and economic needs of all segments of the community while providing opportunities to develop new residential uses in mixed use buildings as well as non-residential neighbourhood components such as schools, community facilities, places of worship, parks and local commercial uses.”*

The proposed Plan of Subdivision meets a number of the objectives for the Residential Policy Area including:

- *Promote and support development, which provides for affordable, freehold and/or rental housing with a full range of density types;*
- *Ensure that land use policies and zoning do not establish barriers to a more balanced supply of housing;*
- *Ensure that residential intensification, infilling and redevelopment within existing neighbourhoods is compatible with surrounding uses in terms of architectural design and density;*
- *Encourage housing opportunities that are in proximity to work, shopping, and recreation to reduce the need to drive and encourage walking and cycling;*

Section 3.2.2.1 identifies that the permitted residential uses shall include a full range of dwelling types from low density single-detached to high-density apartment dwellings.

Section 3.2.2.2 Residential development within the Waterfront Residential policies provides for minimum setbacks of 30m to ensure protection of the shorelines.

Section 3.2.2.6 provides that all development in the Town be on full municipal water and wastewater services and Council shall not contemplate applications that propose development on communal or private services.

Section 3.2.2.8 and 3.2.2.10 policies seeks a mix of housing types and permitting a full range of housing densities. Housing density is seeking a target of 12 units per gross hectare through low and medium density in the current Official Plan.

Affordable Housing is also noted in the policies encouraging higher densities and housing mix where appropriate and it is the intent of Council that such production will be encouraged, as appropriate. Higher density residential development will generally be encouraged in locations having greater amenities or services such as areas in proximity to Commercial designations, Open Space, Arterial or collector roads.

Residential density and affordable housing will only be permitted where it is compatible with the neighborhood, where sewer and water lines have adequate capacity to service higher density development and where the street system is such that traffic, parking and access will not result in negative impacts.

Comment: The proposed development provides for single family detached and townhouse dwellings (subject to compliance with the Development Permit By-law) which contributes to the range of housing types within the Town. The development as presented is an extension of the Residential within this area of Town.

Housing density meets the Official Plan target of 12 units per gross hectare through low and medium density housing with the provision of a total of 100-103 dwelling units. While the draft Official Plan identifies a target density of 16 units per gross hectare. The layout and placement of the road network and residential development were shaped, in part, by environmental features.

The developer provided an Affordable Housing Assessment prepared in support of the proposed Draft Plan of Subdivision, identified as Appendix A under Planning Justification Report – September 17, 2025. The assessment provides that there are tools in place to accommodate Additional Residential Units and the sewage and water briefs were assessed to support that they can be accommodated. Additionally, the Addendum of June 2026 provided that the plan includes townhouses and lots for smaller dwellings.

The proposed street network will be identified as local roads with connectivity to Elmwood Drive, Arthur Street (east) and John Street.

Recreational pathways or open space pathways are provided throughout the development to connect to local roads and areas of the wetlands. Parklands will be further discussed.

Section 3.6 Our Environment provides for significant natural heritage features and the protection thereof. The Town's Official Plan provides that the goal is to conserve, protect and enhance the Town's natural heritage features.

- Endangered species include the Pugnose Shiner, Butternut Tree, Ginseng, Broad Beech Fern, Stinkpot Turtle and Black Rat Snake.
- Areas of fish habitat do not permit development or site alterations except in accordance with Provincial and Federal requirements.
- Shoreline protection and preservation policies are applicable to development along the St. Lawrence River.

Schedule "F" Natural and Cultural Heritage Features provides that the lands are subject to unstable slopes and fish spawning but outside of significant woodlands.



COMMENT: It is noted that the original Environmental Report applied the Endangered Species Act (ESA) which has since been repealed and replaced with the Special Conservation Act (SCA).

The Environmental Assessment provided observations based on field surveys and review for plants and wildlife. Specifically observed on the site was the following:

Butternut Tree (1) – health assessment per provincial guidelines

Chimney Swift – no nesting observed, anticipate nest off-site

Pugnose Shiner – more suitable to St. Lawrence not inlet

Little Brown Myotis bat – recorded but not observed, tend to roost in hollow trees or peeling bark

Tri-colour bat and Hoary bat – recorded but not observed, tend to roost in large forested such as east and west of the site, and older buildings.

The study concluded that the development and potential impacts can be mitigated provided the recommendations and monitoring are undertaken. The EIS recommends the installation of wildlife habitat features including logs and woody debris, turtle nesting area, duck boxes, bat boxes, and an osprey platform. This will be a draft condition.

A peer review was undertaken by Jewell Engineering who concurred with the assessment of the site and that the recommended setbacks should not result in negative impact with the continuation of a monitoring plan.

Minimum setbacks have been implemented between the development and the woodlands (adjacent property east) and St. Lawrence River of 10m.

It is the intent of the owners to convey to the municipality all areas defined as open space. This includes areas of the watercourse and where the wetland modifications are being proposed. The studies have not provided

details of how monitoring will occur or how often. Implementation as set out on an approved enhancement plan will be the responsibility of the owner.

Staff would conclude that the Town accept the blocks (with exception of the archeological site), subject to first obtaining a full understanding of the long-term maintenance and perpetual monitoring responsibilities associated with them.

Comments were received under correspondence from the Cataraqui Region Conservation Authority dated July 22, 2026.

Within the report, outstanding CRCA concerns include:

- The plans do not appear to comply with the 76.1 m regulatory flood level within Blocks 73 and 76, filling appears to be proposed within portions of Street One, Block 73 and Block 76. CRCA does not support floodplain compensation or excavation below the existing flood level as a mechanism to enable development on the St. Lawrence River.
- It remains uncertain whether the proposed watercourse modifications can be permitted. CRCA policy does not support engineered flood-conveyance or flood-control channels used to create or enlarge development envelopes. It has not yet been demonstrated that all affected lots, particularly Lots 24 to 26, contain developable areas that comply with existing policy requirements.
- CRCA recommends shifting Street One north to avoid infilling the central MAS3-1 wetland cell and incorporating the riverine portion of the central MAM2-2 wetland cell into Open Space Block 76.
- CRCA cannot yet confirm the regulatory permissibility of the proposed floodplain, watercourse and wetland alterations under Ontario Regulation 41/24.

Section 3.7 Development Constraints – Planning for Public Health and Safety. The Town's Official Plan identifies that development constraints include the natural resources of floodplains, erosion, unstable or organic soils.

- Hazardous Lands – Flooding and erosion
Applications for development and site alteration in locations where the floodplain is not identified shall adhere to Ontario Regulation 148/06 as administered by the Cataraqui Region Conservation Authority.
- Unstable Slopes and Organic Soils

Schedule "G" Development Constraints provides that the lands are subject to unstable slopes and subject to flood plains.



COMMENT: The Geotechnical Study undertaken by Malroz Engineering Inc. concluded that the lands are suitable for development provided there is continued monitoring and inspections..

A clause is to be included in the subdivision agreement that the owner implement all recommendations and monitoring/inspections during construction of the road and building of dwelling units.

4.0 Making it Work – Our Infrastructures

The goals of the OP policies is to ensure that the infrastructure services are provided appropriately and in a cost-effective manner which recognizes development priorities and protects the environment. The road network is *“to function in a cost effective, efficient and safe manner for the movement of people and goods”*. The objectives further identify that water and wastewater, stormwater and waste management is to be undertaken in a fiscally and environmentally responsible manner.

The proposed road network (Section 4.1.3.2) includes the addition of two streets which will seek a reduction of the street width from 20 metres to 18 metres. The proposed reduced right of standard may be accepted provided infrastructures can be accommodated.

Section 4.1.4 of the OP identifies that water and wastewater infrastructures are maintained and that development should occur where services can reasonably be extended. Development should not occur where it would result in unplanned expansions to the existing infrastructures.

Section 4.1.6 addresses Stormwater Management and that the plan of subdivision shall be undertaken within the Ministry of Environment guidelines.

Comment: Preliminary calculations for the water supply service and sanitary services report both dated May 2026 indicated that the infrastructure is capable of fire flow and pressure to the development. The population density was

based on four people/SFD, 2.38 people/townhouse unit. Fire flows meet the recommended minimum standards.

Public Works has reviewed the proposed Draft Plan, second-submission materials, including the revised background reports and addendums in addition to the CRCA comments dated July 22, 2026 and the following is incorporated:

- The revised submission has addressed several of the original operational and servicing comments. The proposed 18-metre internal rights-of-way and two cul-de-sac configurations are acceptable subject to road detail. Final confirmation will be addressed through a draft condition of approval.
Note: The original submission included three cul-de-sacs and Staff recognize that the configuration of the road network has been influenced by the site's environmental constraints.
Connectivity of sidewalks to Arthur Street (east) is required. Sidewalks are not provided on Elmwood Drive or John Street.
- Proposed watermain looping within both cul-de-sacs addresses the original concerns associated with dead-end watermains.
- Sanitary servicing remains subject to confirmation of downstream capacity within the existing 600 mm trunk sewer, East End Pumping Station, and Gananoque Sewage Lagoons. The sanitary infiltration allowance and proposed sewer velocity criteria requires resolution.

The Stormwater Management Report, Memo – Floodplain Elevation and Setback, Water Supply and Sanitary Servicing reports prepared by Forefront Engineering Inc. were peer reviewed by Jewell Engineering Ltd. While Jewell identified that they had no immediate concerns with the Stormwater Management Design, Public Works is desirous of a SWM plan that reduces as much operational maintenance as possible. Staff are just catching up with the regulatory requirements for existing SWM facilities and do not currently have the resources or capacity to absorb unnecessary or avoidable maintenance requirements wherever possible.

Draft conditions of approval will include final approvals by Public Works Department and the CRCA.

5.4 Development Control

Section 5.4.1 of the OP identifies how a plan of subdivision is to be reviewed. It is reviewed on the basis of technical, environmental and planning and design considerations. Technical considerations include items such as servicing, stormwater plans, grading and other studies.

Planning and Design Considerations include:

1. Consistency with the Lowertown Master Plan where applicable
2. Lot and block configuration
3. Compatibility with adjacent uses
4. Road access, street layout and pedestrian amenities
5. Parks and open space amenities
6. Easement and right-of-way requirements
7. Justification of the need for the Subdivision
8. In considering a draft plan of subdivision, regard shall be had to, among other matters, the criteria of Section 51 (24) of the *Planning Act, R.S.O. 1990*
9. Emergency and secondary accesses

Lot and block configuration

The proposed layout is proposing single detached dwelling units (66), 4 Blocks of townhouses (23 units) and cluster townhouses (12-14). Cluster townhouses are referenced as dwellings within a lot serviced by a private lane.

The applicant has applied for a Class III Development Permit seeking relief to reduce the front lot frontage from 15m to 11m and reduce the floodplain setback from 30m to 15m. The foregoing will be further addressed under the Development Permit by-law review.

Blocks proposed:

Lot Addition (Block 72)	A portion of the subject lands is proposed as a lot addition to an abutting property. This lot addition is approximately 0.955 hectares and has been excluded from the Plan of Subdivision for the purpose of calculating density.
Parks (Blocks 73 and 74)	Block 73 (0.26 ha), adjacent open space (Block 76) of unevaluated wetlands and watercourse. Block 74 (0.256 ha), adjacent open space (Block 76) and the St. Lawrence River.
Open Space Blocks (Block 75, 76, 77)	Blocks 75, 76 and 77 are proposed as Open Space intended to be conveyed to the Town. Staff Note: Wetland Area, Hazard Lands Archaeological identifies the “Jasper” site
Servicing (Block 78, 79, 80)	Block 78 includes an existing sewer Block 79 existing outlet Block 80 existing outlet and provides connection to Open Space
Future Development (Block 81, 82)	Block 81 identified as 0.010 ha Block 82 identified as 0.002 ha

Road access, street layout and pedestrian amenities

- The road network as presented provides connectivity to Arthur Street (east), Elmwood Drive and John Street. The preferred street connection is located along the existing sewer easement, which provides an opportunity to establish a connection between two existing Arthur Streets. However, due to the existing development to the north of the easement, the resulting road alignment would only be developable on one side and not the benefit of development potential on both sides of the roadway. Original submissions did not provide for Arthur Street (east) connection.
- The proposal as submitted appears to provide a portion of lands in the area of Arthur Street (west) that will need to be acquired to incorporate the full street. The conditions of approval will provide a clause in this regard.
- The Traffic Study prepared by GHD in support of the application identified that the proposed subdivision is expected to generate 79 vehicles during am peak/92 during pm peak at the areas of King Street East/Elizabeth and King Street East/William being the arterial intersections carrying the larger volumes of traffic. The Traffic Impact Study addendum does not fully address the outstanding peer-review comments concerning the study area, traffic-count timing, nearby school traffic, interaction between closely spaced intersections, trip distribution, future analysis horizons and active-transportation connections.
- The underlying lands may have a number of existing easements that may be in favour of other parties, particularly residences along the St. Lawrence River. The conditions of approval will include a clause requiring the Owner to acknowledge that any existing easements registered on the property may need to be released, subject to the consent of the affected landowners and confirmation that alternative access arrangements are maintained for adjacent properties.
- The development provides for sidewalks on one side within the interior of the cul-de-sacs. Sidewalk connectivity to Arthur Street (east) is required. Block 80 will additionally serve as pathway connection in addition to servicing. Sidewalks/Pathways are to be 1.5m (5') in width which is the standard in road reconstruction projects throughout the Town. Pathways are to be implemented with stone-dust or an approved material by the Public Works Department.
- Additional conditions of approval will require but are not limited to:
 - Final Lot Grading and Drainage
 - Final Plan and Profile Drawings
 - Final Sediment and Erosion
 - Final Streetlighting - Streetlighting shall include style, design and illumination coverage in keeping with EIS mitigation measures
 - Final Composite utility plans require approval from Public Works and agencies such as Bell Canada, Eastern Ontario Power, Canada Post.
 - Tree Inventory and Preservation plan
 - Notice to all Offers of Purchasers and Sale (Homeowners Manual)

Parks and open space amenities

As a condition of approval, Section 51 of the Planning Act, Bylaw 83-44 and Section 5.4.5 of the Official Plan provides that the Town may seek cash-in-lieu of parkland or the acquisition of lands for a public park or recreational uses. Consideration should be given to the need, size of the parcel being conveyed, the appropriateness, location and usability of the land. The proposed plan of subdivision is offering the Town lands for their contribution to parkland.

Review of the Joint Recreation Master Plan dated February 2019 and accepted under Motion No.2020-005 was considered by Staff. The Plan identifies that *“the municipalities (TLTI and the Town) should focus efforts on obtaining cash-in-lieu (CIL) of parkland as the preferred method of parkland dedication for new developments in order to pool resources to acquire larger park parcels that can be used for a variety of active and passive recreation uses, or the improvement of existing facilities (i.e. Lou Jeffries Park, Jerry Park, etc.)”*. It further notes that *“Parkland acquisitions in areas of growth and future developments must be considered based on their connectivity to the existing parks, open space and trails system, street frontage, and ease of accessibility. It should also be of sufficient size and configuration to allow for the development of a variety of active and passive amenities, with a priority to develop larger parks (as appropriate) over smaller parkettes”*.

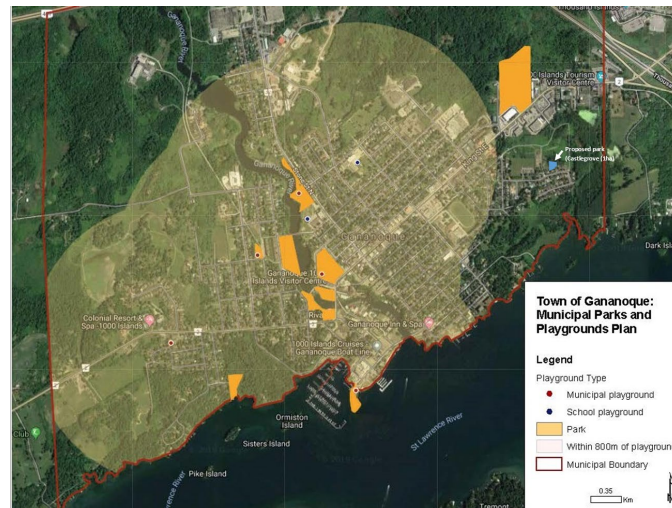
The plan further provided for recommendations regarding parkland service levels and acquisition as follows:

Recommendation(s): Parkland Service Level & Acquisition

- 63. Plan to acquire a combined total of 18.50 hectares of parkland by 2029 to meet parkland needs associated with projected population growth.*
- 64. Maximize the supply of available parkland through a range of strategies, including dedication by development, donations, accessing grants, land trusts, conservation easements, land exchange, partnerships, agreements and direct purchase.*
- 65. Consider the acquisition of undevelopable natural open space areas through the development process and other means of securement to provide opportunities for enhanced conservation, and compatible public access and linkages to the parks, trails and open spaces, as per Section 51(25)(b) of the Planning Act. This land should not be accepted as part of the parkland dedication requirement (i.e. no credit is to be applied).*
- 66. Continue to consider cash-in-lieu of parkland and acquisition of additional parkland by other means where land acquired through dedication by development is insufficient in size or shape for the intended park function.*

The south-east quadrant of the Town has little to no recreational areas in terms of fields, play structures or park space. Within the general area, the Lou Jefferies Municipal Complex provides for tennis/pickleball courts, arena and ball/soccer fields.

The Castlegrove Subdivision in the area north of MacDonald Drive, east of Wilmer and the newly constructed Jean Drive (west) includes a condition for a Park Development Plan which is to be submitted and satisfactory to the Town. If the proposal is acceptable the lands will be accepted within the development. To date, no plan has been provided for consideration. Other areas in proximity include 355 Arthur Street (Grasshopper Park) and the community gardens.



Consideration of parkland should include lands that are useable and not hazardous or intended to serve for other purposes of the development such as a wetlands or stormwater management pond.

Block 73 and 74 are being proposed as public parks with Street One and Street Two providing access.

- Based on what is being proposed and comments received, Block 73 may primarily be wetlands and may not be suitable as parkland. This is supported by the CRCA comments.
- Block 74 is located adjacent to the St. Lawrence River and provides an opportunity to establish public waterfront access and a waterfront park area. While Section 3.1.2.2 of the Official Plan references the Lowertown Master Plan, the intent and objectives of the policy are considered applicable to the proposed area. Specifically, the provision of public open space can support the creation of safe, attractive, and inviting areas for public use while providing a visual transition between private and public spaces.

Additional areas, aside from parkland being proposed to the Town are those identified as Open Space being the areas of the wetland and watercourse that runs east-west throughout the subdivision.

Parkland and/or Cash-in-lieu of Parkland will be a condition of draft approval.

Easement and right-of-way requirements

Easements will be identified in the subdivision agreement for servicing, wetlands, stormwater management or connectivity.

Criteria for consideration of Section 51 (24) of the Planning Act

As identified earlier in the report, consideration for a plan of subdivision shall consider Section 51 (24) of the Planning Act. Criteria has been identified within the report and comments received by the agencies and the public via circulations and technical meetings.

An initial meeting was held December 9, 2024, May 21, 2025, August 26, 2025, October 16, 2025 and January 15, 2026 with Jennifer Ailey representing 100989284 Ontario Inc. c/o Tomlinson Limited.

A Technical Review meeting was held on February 9, 2026 with representatives from 100989284 Ontario Inc., MHBC Planning Urban Design & Landscape Architecture representing the Owner, Kyle Nielissen of Forefront Engineering representing the Owner, Public Works and Planning Staff along with invitations extended to CRCA, Enbridge, Cogeco, Eastern Ontario Power, Bell Canada and CRCA. Additional meetings were held on March 3, 2026 and May 6, 2026 with the representatives and CRCA.

Notice of complete application and background information was posted to the Town's website February 6, 2026.

Notice of the Public meeting was circulation to abutting landowners within 120m of the property and posting of the property along with posting of the background information on the Town's website and available at Town Hall July 2, 2026.

Emergency and Secondary Accesses

The development provides for connectivity to existing streets including Arthur Street, John Street and Elmwood Drive.

5.10.3 Heritage Conservation

Complete applications for a Plan of Subdivision include archeological studies for lands that are proposed on lands within 300 metres of a shoreline. The subject lands included a Phase 1 and 2 as well as a Phase 3 for two particular sites.

Section 5.10.3 of the Official Plan policies indicate that "Council may consider archaeological preservation in-situ, to ensure that the integrity of the resource is maintained."

COMMENT: Identified archeological areas on Street 2 and Lot 55, 56, 57 are proposed to undertake a Stage 4 Archaeological Assessment. Street 2 is required in advance of the development moving forward. This area will be

designated with a holding provision in the Development Permit By-law that works are to be undertaken prior to development.

An archaeological area has also been identified adjacent to Lots 36 and 37 and is proposed to be conveyed to the Town as part of the open space block.

Staff are not recommending that the Town assume ownership of this area. Retaining these lands in perpetuity would require the Town to monitor and maintain the archaeological site, creating ongoing obligations for the Town as a municipal asset. The proposed area is located behind residential dwellings and is not visible from public roads or other routinely monitored municipal lands.

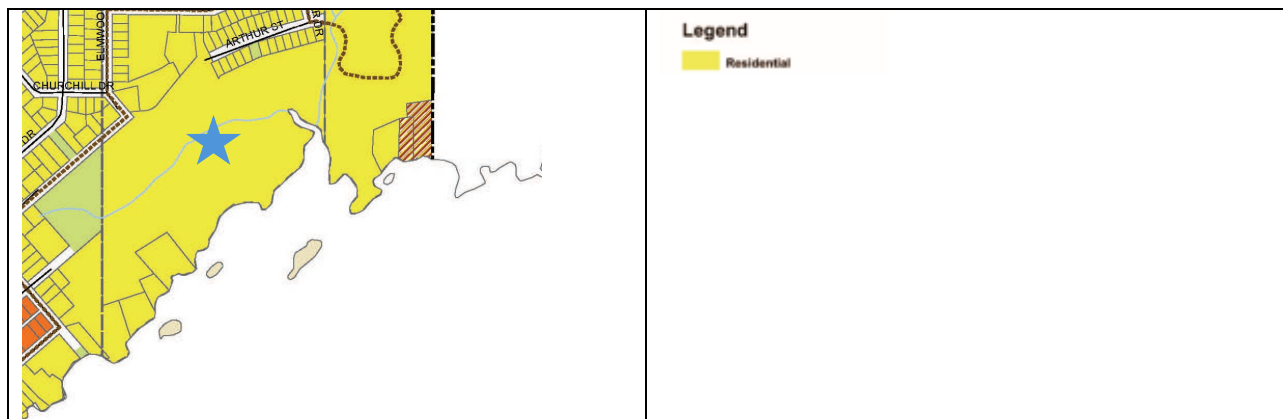
Consultation with the Ministry of Citizenship and Multiculturalism identified that should the Town assume ownership of the Jasper site, the Town would be required to provide a formal commitment letter. Note: the Ministry has indicated that the archaeological area must first be clearly delineated. To date, the Ministry has not established the boundaries of the site; this could be addressed through the preparation of a reference plan.

It is recommended that the area undertake a Stage 4 and following Ministry acceptance be incorporated as part of Lots 38 and 39.

Development Permit By-law

Compliance with the Development Permit By-law is a condition of draft approval.

The area of the proposed plan of subdivision is designated Residential with the Development Permit By-law. The designation provides for a variety of residential uses including single family dwellings and townhouses.



Summary of site specific:

- Park blocks and open space areas are proposed to be re-designated from “Residential” to “Open Space”.
- Natural Features Setback: minimum 15m setback from the floodplain (Lots 54 to 66) and wetland (Lots 19 to 21), 6m along the watercourse (Block 76)

In addition to the above, the proposed setbacks should apply to all recommended setbacks; 15m from retained wetland features, minimum 6m from the existing high-water level of the watercourse and 6m from the top of steep slopes.

Below outlines the proposed site provisions seeking relief for Lots and/or Blocks of residential:

- Temporary Holding: Lots 55, 56, and 57 requires the completion of a Stage 4 Archaeological Assessment prior to development proceeding. (Note: Street 2 will be a condition of approval).
- Reduced Lot Frontage: Lots 7–19, 22, 24–33, and 35 seeking a reduction from 15m to 11m.
- Of note: Block 71 will require an additional Development Permit application upon determination of the layout of the lands.

CIRCULATION TO AGENCIES

Circulation of 120 m to adjacent property owners and prescribed agencies (comments received to date):

CAO	No comments.
Chief Building Official	
CRCA	
School Boards: CDSBEO/UCDSB Health Unit: South East Health Unit	
Utilities/Public Works: Bell Canada/ Canada Post/ Cogeco/Enbridge Gas/ Eastern Ontario Power/Hydro One (OPG)	Enbridge: No objection. Condition provided for easements/agreements
EMS: Fire/LG Paramedic/Police	Fire: No concerns
Parks and Recreation	The Town could use parkland in that area of Town. Staff are fully supportive of it. Although the lands are not ideal to access, it would be very suitable
Public Works, Water/Sewer Utilities	Public Works comments are incorporated within the report.
St. Lawrence Parks Commission/ MTO/ Other Commenting Agencies	MTO: No land development review required
Neighbourhood: Posting and 120m Circulation, Posting on Town	Abley – 175 Elizabeth Street Beer – 175 Elizabeth Street

website	Corbett – 607 Arthur Street Creagh – 685 Arthur Street Finn – 265 Churchill Drive Goddard Heppelle – 132 Maplecroft Court Kluensch – 205 Elmwood Drive Marion – 124 Maplecroft Court Martin McCallum – 165 Elmwood Drive McCallum – 165 Elmwood Drive McLean – 335 Elmwood Drive McLean 2 Pajunen Williams – 625 Arthur Street Ruddock – 695 Arthur Street Sprenger – 140 Elmwood Drive Thomas – 335 Elmwood Drive Thomas – 335 Elmwood Webber – 125 Elmwood Drive
---------	---

Correspondence received from residents (attached) have been summarized as follows:

- impacts on the natural environment, wildlife habitat, wetlands, tree cover, floodplain function, stormwater runoff, and the St. Lawrence River.
- increased traffic, pedestrian safety, construction truck routing, noise, dust, blasting, potential property damage, and road deterioration.
- whether existing municipal infrastructure, including sewer, water, stormwater, road, and electrical systems, has sufficient capacity.
- density, reduced setbacks and lot frontages, loss of privacy and neighbourhood character, and the need to preserve green space, trails, and possible waterfront access.

The Town appreciates the correspondence received from residents and recognizes the importance of community input in the development review process. The comments received have been considered and will inform the technical review of the application.

Natural Environment

The applicant has provided the appropriate studies to consider the natural environment of the property. These have been peer reviewed and the Cataraqui Conservation Authority has been a part of the discussions since the applicant came forward. Subject to Draft Approval, draft conditions set out the requirements for the application including implementation and mitigation measures.

Traffic and Construction

The Town acknowledges that construction and increased traffic are temporary inconveniences that are generally unavoidable during development. Efforts will be made to minimize the impacts including a construction traffic route.

Municipal Infrastructure Capacity

The applicant has provided the appropriate studies to demonstrate that adequate servicing capacity exists or can be provided before development proceeds. Public Works as a condition in draft approval and final approvals are required.

Neighbourhoods

The lands are located in a Residential designation within the Official Plan and Development Permit By-law; housing is permitted. As part of the process the Planning Act, Provincial Planning Statement and Official Plan set policies for consideration including density, surrounding areas, landscaping, open space.

Staff do not object to a residential development on the lands. However, there are outstanding and unresolved matters that should be apprised of prior to considering the issuance of draft approval, including, but not limited to:

- CRCA correspondence dated July 22, 2026
- Open Space blocks – response to monitoring and on-going maintenance, long-term prior to Council considering and acceptance of additional assets.
- Archaeological (within open space) – area be excluded from the Open Space and the lands undertake a Stage 4 to be incorporated in Lots 38 and 39.
- Acquisition of lands from adjacent property owner to connect to existing Arthur Street (east)

The unresolved matters may require revisions to the proposed road alignment, lot configuration, park and open-space blocks, grading, stormwater design and development permit.

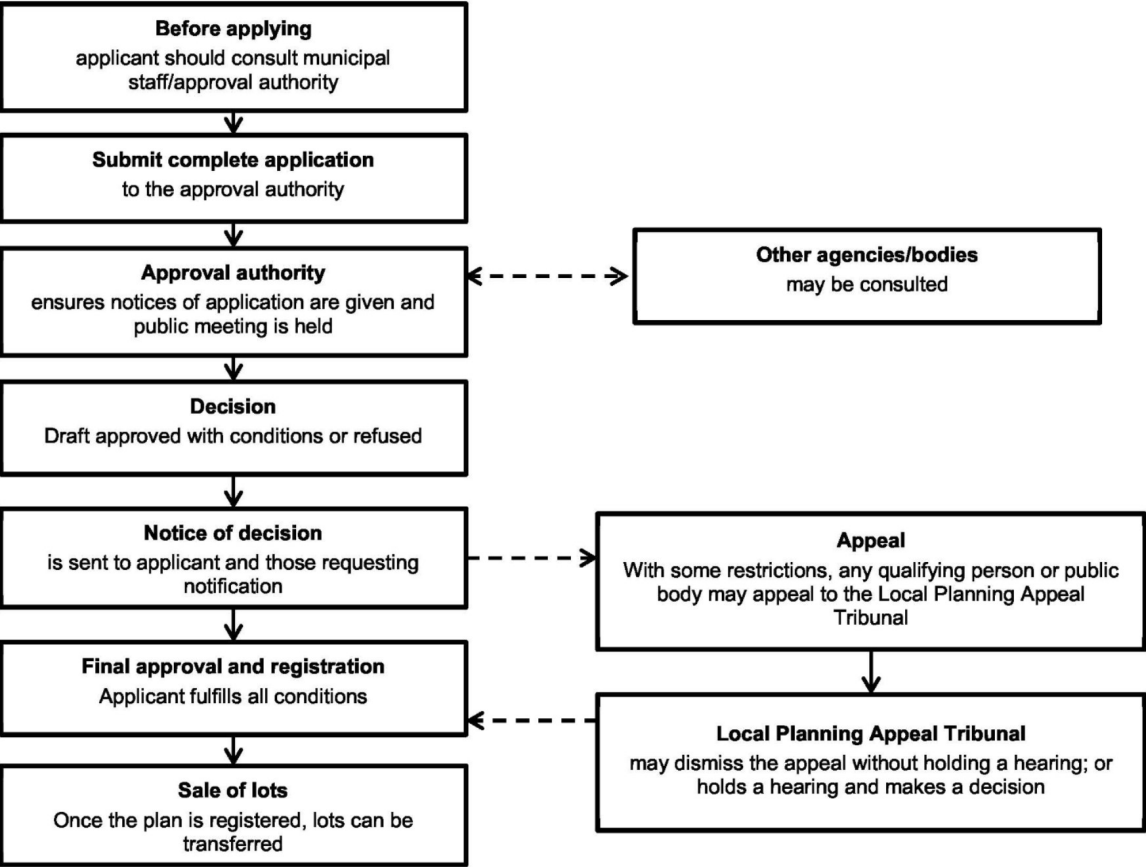
Given the foregoing, Staff recommend that consideration of Draft Plan of Subdivision Application SD2025-01 and the related Development Permit Application DP2026-04 be deferred.

Attachment 1 – Approval Process
Attachment 2 – Planning Act, Section 2
Attachment 3 - Peer Reviews
Attachment 4 – Comments received from Agencies
Attachment 5 – Comments received from Public

APPROVAL	
	Brenda Guy, Manager of Planning and Development

Attachment 1

Flowchart: Subdivision Process



Attachment 2 – Planning Act, Section 2: Provincial Interest

The Minister, the council of a municipality, a local board, a planning board and the Tribunal, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matters of provincial interest such as,

- (a) the protection of ecological systems, including natural areas, features and functions;
- (b) the protection of the agricultural resources of the Province;
- (c) the conservation and management of natural resources and the mineral resource base;
- (d) the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;
- (e) the supply, efficient use and conservation of energy and water;
- (f) the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;
- (g) the minimization of waste;
- (h) the orderly development of safe and healthy communities;
- (h.1) the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;
- (i) the adequate provision and distribution of educational, health, social, cultural and recreational facilities;
- (j) the adequate provision of a full range of housing, including affordable housing;
- (k) the adequate provision of employment opportunities;
- (l) the protection of the financial and economic well-being of the Province and its municipalities;
- (m) the co-ordination of planning activities of public bodies;
- (n) the resolution of planning conflicts involving public and private interests;
- (o) the protection of public health and safety;
- (p) the appropriate location of growth and development;
- (q) the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;
- (r) the promotion of built form that,
 - (i) is well-designed,
 - (ii) encourages a sense of place, and
 - (iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;
- (s) the mitigation of greenhouse gas emissions and adaptation to a changing climate.



July 21, 2026

Town of Gananoque
30 King Street East
Gananoque, ON

Attn: Brenda Guy
Manager of Planning and Development

**RE: Elmwood Subdivision – 205 Elmwood Dr, Gananoque, ON
Engineering Review of Traffic Impact Study Report
Jewell Project No.: 250-9941-01**

Ms. Guy,

Jewell Engineering Inc. (Jewell) reviewed the first submission and addendum traffic impact studies (TIS) by GHD Group dated August 26, 2025, and June 25, 2026 (respectively), for the Elmwood subdivision in Gananoque, ON.

The TIS was initially prepared to support the construction of 77 single-detached homes in the southeast end of Gananoque on Elmwood Drive. The draft plan was then revised to provide 66 single-detached homes, 23 street townhouses, and 12-14 attached townhouse units for a total of ~103 units. The TIS addendum reflects the revised draft plan and updates the 2025 trip generation, distribution and assignment, and 2030 future traffic conditions. The addendum concludes that the road network can accommodate the development-generated traffic without any improvements, consistent with the conclusions of the initial TIS submission.

The results of our transportation engineering review are as follows.

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Traffic Impact Study – Elmwood Subdivision (August 26, 2025)

1.1

- How were the study intersections identified? Was a Terms of Reference prepared and approved? The intersections at William St S / Elizabeth Dr and King St / Herbert St have not been considered.
- Gananoque Secondary School, which generates a large volume of traffic from September to June, is located ~250m from the site location at Elizabeth Dr / William St. The consultant should provide justification for the seasonal timing of the traffic counts and discuss the expected impact of school traffic.
- Was a Terms of reference prepared and approved or were communications with staff conducted to confirm there are no active developments in the vicinity that should be considered in the study?

2.0

- How were the Weekday AM and PM peaks selected as the study peak periods? Should weekend peak analysis be completed? Was a Terms of Reference prepared and approved?
- Traffic counts were collected on Thursday, July 10, 2025, from 7:30-9 AM and 4-5:30 PM.
 - How were the time periods for the counts established? Were the peak hours known from other available data prior to scheduling the counts? Otherwise, with such a short count period, there is potential that the peak hour got truncated.
 - The development is one block east of Gananoque Secondary School, and is located less than 1km from St. Joseph Catholic School and Linklater Public School. Summer counts do not capture school-related traffic. The Author should consider whether the counts are reflective of peak conditions.
- How was the existing signal timing established? Was a site visit completed? Was data provided by the Municipality? Discussion should be included in the report regarding signal timing, coordination, actuation, and phasing.

2.1

- Why was the intersection of King St E / Herbert St not considered? It is an offset intersection to King St E / Elizabeth St (~32m CL-CL). The offset is less than minimum spacing per TAC. The operation of this intersection is expected to impact the operation of the King St E/Elizabeth Dr intersection.

- The Author should justify the use of HCM2000 for the King St E / Elizabeth Dr intersection. Use of HCM2000 does not account for the underlying issue of closely spaced intersections and their interaction with each other. The Author should complete analysis with Sim Traffic to account for the interaction between the two intersections and verify results.

3.2

- The author should evaluate the trip distribution applied in consideration of trip desire lines from the existing southern side streets as opposed to relying solely on EB/WB traffic on King St E which is heavily influenced by external trips. For example, 65-70% of trips entering William Street & Elizabeth Drive are entering from the west vs. 55% applied.

4.0

- A buildout year of 2030 seems appropriate; however, further projection should also be considered. The 5-yr and 10-yr projections (beyond buildout year) of background and background plus development are typically included for plan of subdivision submissions.

5.0

- General comments for Transportation Demand management (TDM) were not provided, and the author did not discuss which measures the development uses, if active transportation is likely to be used, impacts to the conclusions of the study, etc. How will the proposed development's active transportation infrastructure provide connectivity to the existing network?

General

- Report shall be sealed by a licensed professional engineer per PEO's guidelines (R.R.O. 1990, Regulation 941; O. Reg. 837/21).

Traffic Impact Study Addendum – Elmwood Subdivision

2.0

- Not clear if the rates used are based on Peak Hour of Generator, or Peak Hour of Adjacent Street Traffic. They appear to be peak-hour of adjacent street traffic.

3.0

- See previous comments for trip distribution and assignment. Refer to *Traffic Impact Study – Elmwood Subdivision* 3.2.

4.0

- See previous comments for future traffic volumes and growth rate. Refer to *Traffic Impact Study – Elmwood Subdivision* 4.0.

5.0

- See previous comments for conclusions. Refer to *Traffic Impact Study – Elmwood Subdivision* 5.0

General

- Report shall be sealed by a licensed professional engineer per PEO's guidelines (R.R.O. 1990, Regulation 941; O. Reg. 837/21).

If you have any questions please feel free to contact the undersigned.

Sincerely,



Amanda Redden, P.Eng.
Jewell Engineering Inc.



Andrew Rosenthal, P.Eng.
Jewell Engineering Inc.

Elmwood Drive – Jewell Engineering Inc. Comment Response Matrix

Comment	Response	Comment 2
Jewell Engineering Inc. – Environmental Impact Assessment		
Section 1.2.2 Stream 1 and Elmwood Drive Wetland Enhancements We generally agree that an enhancement plan to Stream 1 and Elmwood Drive Wetland will improve ecological function. The report states that invasive species will be removed, the practice in which they will be removed could be clarified. Will the invasive plants physically be removed or will herbicides be used. The invasive species that are present such as <i>Typha</i> are well known to be difficult to remove due to their ability to grow rhizomally which allows them to spread and form colonies. This is something to consider when trying to find the best management practices when removing invasive species.	Noted – We recognize the challenges with removing <i>Typha</i>, and this will be considered as specific details of the enhancement are developed. The use of herbicides is to be decided, but if used, will be under the guidance of a licensed applicator, following all regulations, with input from experts and appropriate agencies.	Satisfied.
Section 4.2.1 Ecological Land Classification This section details the Ecological Land Classification designations for each community type found within the study area. Content in relation to soil sampling could be more consistent if possible. This includes having the moisture regime for each community as some miss this information.	Noted – moisture regime and other soil characteristics are only provided for communities owned by the proponent, as permission for soil sampling on adjacent properties was not had. In addition, soil sampling was not conducted in the SAS Submerged Shallow Aquatic community for practical reasons of sampling under water.	Satisfied.

Comment	Response	Comment 2
Section 4.2.3 Soil Characterization The soils could be named, not just described. Many of the soils reports reference primarily names, not just characteristics and have practical guidelines for restoration and management, albeit in an agricultural context but is still relevant for growing plants. This could be helpful when drawing conclusions and recommendations for this assessment.	Noted – other than the detailed soil stations noted in the EIA, soil sampling was limited to the protocols of Ecological Land Classification (ELC), and the Ontario Wetland Evaluation System (OWES), which is limited in the details required. However, additional soils details from the Geotechnical Report, other sources, and if required, additional sampling/classification will be considered as part of the enhancement plan.	Satisfied.
Section 5.7.4 Bats Information that pertains to the parameters that define the types of trees that are important to determine the likelihood of bat maternities (e.g. diameter at breast height (DBH), basal area and crown closure estimates) could be beneficial.	Noted – Bat habitat assessments were conducted by experienced staff, and all parameters that relate to bat maternity roosting were considered	Satisfied.
Section 7.1 Setbacks and Enhancements We agree with the various recommended setbacks and that they will not result in negative impacts to the features	Noted.	Satisfied.
Section 7.2 Fish and Fish Habitat Mitigation Fisheries could include reference to early spring monitoring as it is possible that northern pike could enter the wetland during their early spring spawning activity. We agree that the proposed improvements to the stream channel and the creation of	Noted – The Elmwood wetland was accessed during early spring, although fishing was not conducted. Water levels were not suitable for pike spawning; however, the inlet may be suitable which will be protected as part of the proposed development. Any alterations to the potential fish habitat will be conducted with approval from DFO.	Satisfied.

Comment	Response	Comment 2
an open water area in the wetland should make for a significant improvement in the fish habitat quality over time.		
Appendix G Wetland Enhancement Concept Plan There are various questions in relation to the enhancement plan. However, the report says that more detail will be included with further discussion with the applicable agencies. Below are some comments and questions to keep in mind while finalizing the plan: What will the monitoring plan consist of? How often will monitoring occur and what is the duration of the monitoring plan? How will the success of the enhancement be determined? What is the ideal rate of survival for the plantings? What is the ideal timing for planting in order to give the plants the best chance at success? How was the correct number of habitat structures determined? In conclusion, we agree with the physical assessment of the study area and the recommendations made. We believe that the recommended setbacks will not result in negative impacts. The enhancement plan	Noted – We appreciate these “food for thought” questions, and they will be considered during development of the enhancement plan and post- construction monitoring. We appreciate your agreement and also agree the enhancement plan needs fine-tuned and more details will be provided.	Satisfied.

Comment	Response	Comment 2
should continue to be fine-tuned along with the monitoring plan with consultation from the applicable agencies.		
Jewell Engineering Inc. – Engineering Review of Sanitary and Water Servicing Reports		
Suggest infiltration be increased to 0.28L/s.	Refer to the revised Sanitary Sewer Design Sheet. Infiltration is increased to 0.28 L/s/ha.	Satisfied.
Clarify actual velocities. Which sections of pipe will have $d/D < 0.3$?	The CLI-ECA Design Criteria have consolidated and clarified the applicable sewer design requirements relative to the 2008 Design Guidelines for Sewage Works, and establish a minimum velocity criterion of 0.6 m/s when flowing full. The CLI-ECA guidelines do not prescribe a minimum d/D ratio at peak sanitary design flow. Requiring $d/D = 0.3$ under peak design conditions would extend beyond the requirements set out in the current CLI-ECA Design Criteria. As per CLI-ECA Design Guidelines item 2.4.2 (May 2023) reads: “All gravity Sanitary Sewers shall be designed and constructed with slopes to provide at least 0.6 m/s of flow velocity, when flowing full to maintain solids in suspension.” The proposed sanitary sewer exceeds 0.6 m/s velocity at full flow capacity for all pipe runs and is in accordance with the CLI-ECA guidelines. We have provided a d/D column in the revised Sanitary Servicing Report. The entire sanitary sewer pipe system has $d/D < 0.3$. Re-sloping	Satisfied. See commentary in cover letter regarding increased maintenance obligation by municipality.

Comment	Response	Comment 2
	the sanitary sewer to achieve 0.6 m/s under peak sanitary design flow conditions would require substantially steeper slopes in the order of 3% and raising the road by ± 10 m to accommodate the increased slopes is impractical. This is typical in subdivision design, as achieving $d/D > 0.3$ at minimum allowable slope generally requires an equivalent contributing population on the order of approximately 450 persons or ± 7 L/s.	
There appears to be no discussion regarding the capacities of the 600mm trunk, the pump station and the sewage lagoon. It is suggested the municipality confirm the ECAs for each to determine if there is sufficient capacity in the pump station and lagoon	The Town of Gananoque has confirmed that it will review downstream capacity.	Satisfied.



June 10, 2026

Town of Gananoque
30 King Street East
Gananoque, Ontario
K7G 1E9

Attn: Mr. David Armstrong

**RE: Elmwood Subdivision – Detailed Design
Engineering Review of Sanitary and Water Servicing Reports
And Review of EIS
Jewell Project No.: 250-9941**

Mr. Armstrong,

Please find our reviews of the revised Environmental Impact Study (EIS) and Functional Servicing Report (FSR) included.

EIS

We've reviewed the responses to our previously submitted EIS comments. The responses sufficiently address our previous comments, refer to the comment response matrix for further detail.

FSR

We've reviewed the revised functional servicing report and note that the requested changes have been made. The designers also provided some commentary within the response matrix regarding the distinction between the 2008 Design Guidelines for Sewage Works, and the newer 2023 Design Criteria for Sanitary Sewers (*abbreviated*) concerning minimum velocities in sanitary sewers. The assertion is that the 2023 guidelines supersede the 2008 guidelines and since the new guidelines do not make mention of the condition of pipes flowing partially full the calculation is not required.

We acknowledge the apparent contradiction between the 2023 CLI and the 2008 Design Guidelines for Sewage Works as it relates to the full vs partially full calculation. The 2023 guideline makes no reference to the partially full test. Would this then provide an opportunity for a designer to change how pipes are designed or has the Ministry learned that actual velocity

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calculation is not meaningful and they've dropped that requirement? This is not discussed in the 2023 guidelines. Perhaps it is neither answer and the two guidelines are each issued for different purposes and one does not obviate the other.

The 2008 guidelines contain a complete explanation of their progeny and list the guidelines they were intended to replace. By contrast, the new 2023 guidelines don't make a claim to revoke or supersede the 2008 guidelines and in fact make no reference at all to the 2008 guidelines. Jewell has not been able to find any other reference by the Ministry that states the 2008 guidelines have been superseded or replaced by the 2023 CLI guidelines.

Further, the issuance of the new guidelines would not make the physical problems associated with deposition in the circumstance of low velocity and partially full pipes disappear. If the shallow slopes and low usage of the proposed pipes would increase the likelihood of deposition and the maintenance effort, the calculation of actual velocity makes this apparent to the designer and the municipality.

With that said, the 2008 guidelines do not outlaw this circumstance, but require designers to make the calculation in order to reveal pipe sections which may be flowing partially full and having actual velocities less than the target minimum thereby alerting the designer and the eventual owner that those sections of pipe will potentially require more maintenance. If the design can be altered to minimize this – perfect. If this is not feasible, then the question is deferred to the municipality. If the municipality accepts they may need to perform more maintenance, now they are making an informed decision.

We note that the designers have responded to our recommendation and made apparent the actual velocities on the revised sanitary sewer design sheet. Actual velocities will be less than the recommended minimum of 0.6m/s for most of the proposed pipes. This indicates **the sanitary sewers in this development will likely require more maintenance. The guidelines permit the municipality to accept the pipe design with the understanding of increased maintenance obligation.**

We've clipped the Section 5.7.6 from the 2008 guidelines that include this instruction.

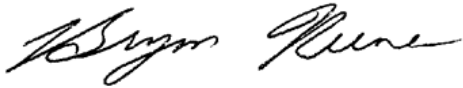
5.7.6 Maximum and Minimum Velocities

All sewers should be designed with such slopes that they will have a minimum sewage flow velocity, when flowing full, of at least 0.6 m/s (2.0 ft/s). In cases where the flow depth in the sewer, under peak flow, will not be 0.3 of the pipe diameter or greater, the actual flow velocity at peak flow should be calculated using a hydraulic elements chart and the slope increased to achieve adequate flushing velocities. In certain circumstances, such as where increased slopes would require deepening of extensive sections of the sewage collection system or the addition of a pumping station, peak

sewage flow velocities of less than 0.6 m/s (2.0 ft/s) may be considered provided that the municipality accepts that there may be increased maintenance requirements.

If you have any questions, please feel free to contact the undersigned.

Sincerely,



Bryon Keene, P. Eng.
Jewell Engineering Inc.



Amanda Whitehead, MSc
Jewell Engineering Inc.

January 20, 2026

Town of Gananoque
30 King St E
Gananoque, ON K7G 1E9

Att'n: Planning and Development, Town of Gananoque

RE: 205 Elmwood Drive
Environmental Impact Assessment Peer-review
Jewell Engineering File No. 250-9941

Jewell Engineering Inc. (Jewell) has reviewed the following supporting documentation for the proposed development at 205 Elmwood Drive in the Town of Gananoque, ON:

- Environmental Impact Assessment – 205 Elmwood Drive, Gananoque, Ontario (August 29, 2025)

WSP Canada Inc. (WSP) was retained by 1000989284 Ontario Inc. to conduct an Environmental Impact Assessment (EIA) in accordance with the guidelines of the Town of Gananoque for a proposed residential subdivision development. The proposed development is a residential subdivision, consisting of 77 single-detached lots.

The site is approximately 11.59 hectares in size and has various natural features such as forest, wetland, open areas and a small watercourse (Stream 1). As part of the proposed development, alterations, improvements and enhancements are proposed to Stream 1 and the non-significant Elmwood Drive Wetland.

Section 1.2.2 Stream 1 and Elmwood Drive Wetland Enhancements

We generally agree that an enhancement plan to Stream 1 and Elmwood Drive Wetland will improve ecological function. The report states that invasive species will be removed, the practice in which they will be removed could be clarified. Will the invasive plants physically be removed or will herbicides be used. The invasive species that are present such as *Typha* are well known to be difficult to remove due to their ability to grow rhizomally which allows them to spread and form

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colonies. This is something to consider when trying to find the best management practices when removing invasive species.

Section 4.2.1 Ecological Land Classification

This section details the Ecological Land Classification designations for each community type found within the study area. Content in relation to soil sampling could be more consistent if possible. This includes having the moisture regime for each community as some miss this information.

Section 4.2.3 Soil Characterization

The soils could be named, not just described. Many of the soils reports reference primarily names, not just characteristics and have practical guidelines for restoration and management, albeit in an agricultural context but is still relevant for growing plants. This could be helpful when drawing conclusions and recommendations for this assessment.

Section 5.1.1.2 Biological and Habitat Function

We agree with the assessment that the wetland plant biodiversity is limited. This is due to the high number of invasive species present on the property as well as few desirable plants that are outcompeted with invasive species. The definition of “desirable plants” could be clarified as it is not clear the criteria to meet this definition. Typically, this might mean established native species that also may provide key ecosystem services. We agree that the size reduction of the Elmwood Drive Wetland will not result in a loss of ecological function. We also agree that the enhancement plan will increase ecological function of the wetland due to the removal of invasive species, planting of native species and installation of wildlife habitat features.

Section 5.7.4 Bats

Information that pertains to the parameters that define the types of trees that are important to determine the likelihood of bat maternities (e.g. diameter at breast height (DBH), basal area and crown closure estimates) could be beneficial.

Section 7.1 Setbacks and Enhancements

We agree with the various recommended setbacks and that they will not result in negative impacts to the features as described below:

- A 15 m naturalized setback will be applied to the enhanced Elmwood Drive Wetland.
- A 6 m naturalized setback will be applied to the proposed highwater mark of the improved Stream 1.
- A 15 m setback will be applied to the portions of the adjacent coastal wetland that are not directly associated with the St. Lawrence River.
- A minimum 10 m setback will be applied between the proposed development and the adjacent significant woodland.

Section 7.2 Fish and Fish Habitat Mitigation

Fisheries could include reference to early spring monitoring as it is possible that northern pike could enter the wetland during their early spring spawning activity. We agree that the proposed improvements to the stream channel and the creation of an open water area in the wetland should make for a significant improvement in the fish habitat quality over time.

Appendix G Wetland Enhancement Concept Plan

There are various questions in relation to the enhancement plan. However, the report says that more detail will be included with further discussion with the applicable agencies. Below are some comments and questions to keep in mind while finalizing the plan:

- What will the monitoring plan consist of?
- How often will monitoring occur and what is the duration of the monitoring plan?
- How will the success of the enhancement be determined?
- What is the ideal rate of survival for the plantings?
- What is the ideal timing for planting in order to give the plants the best chance at success?
- How was the correct number of habitat structures determined?

In conclusion, we agree with the physical assessment of the study area and the recommendations made. We believe that the recommended setbacks will not result in negative impacts. The enhancement plan should continue to be fine tuned along with the monitoring plan with consultation from the applicable agencies.



Amanda Whitehead, MSc
Jewell Engineering Inc.



January 20, 2026

Town of Gananoque
30 King Street East
Gananoque, Ontario
K7G 1E9

Attn: Mr. David Armstrong

**RE: Elmwood Subdivision – Detailed Design
Engineering Review of Sanitary and Water Servicing Reports
Jewell Project No.: 250-9941**

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Mr. Armstrong,

Jewell Engineering has completed a review of the sanitary and water servicing designs for the Elmwood Subdivision. Several documents were submitted to assist our review including:

- Stormwater Management Report, Forefront Engineering, August 2025
- Memo – Floodplain Elevation and Setback, August 26, 2025
- **Elmwood Subdivision – Water Supply Report, August, 2025**
- **Elmwood Subdivision – Sanitary Servicing Report, August 2025**
- Traffic Impact Study, GHD, August 26, 2025
- Geotechnical Investigation, Malroz, September 11, 2025

The subdivision application would create 77 new single family dwelling lots with potential for 2 additional lots pending clearance of archaeological investigation. The land holdings include 11.58ha.

Sanitary

Two sanitary connections will be made to the 600mm trunk sewer. One will be made near the extension of Elmwood Drive and the other along Arthur Street. The 600mm trunk sewer drains to the East End P.S.

Capacity would need to be demonstrated in:

1. The 600mm trunk sewer
2. The East End P.S.
3. The Gananoque Sewage Lagoons.



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The sanitary peak flow estimates were based on:

- 350L/person/day,
- 4 persons per single detached home,
- 2.38 persons for a semi-detached home,
- 2.38 persons for a townhouse, and
- infiltration allowance of 0.14L/s/ha.

The per capita usage of 350L is typical. The number of persons per household is generally dictated by the municipality. The report calculates 316 persons in 79 single family dwellings with an average of 4 persons per dwelling unit. This is slightly higher compared with some other jurisdictions that use 3 to 3.5, but represents some conservatism that makes up for a slightly lower calculation of infiltration.

The 0.14L/s/ha infiltration value is low. While there is no correct value, typical value for eastern municipalities tends to be 0.28L/s/ha (with several exceptions) and this is borrowed directly from MECP guidelines.

Flow monitoring can better help estimate inflows, but if a municipality experiences very high flows during storm events, it indicates their system is more at risk of higher inflows and should use the standard value. This would make a difference of as much as 1.6L/s if the entire property area is considered. FSR includes 7.91ha of area serviced by the sanitary sewer – this results in a 1.1L/s/ha difference. This underestimate of infiltration is offset somewhat by a slight overestimate of population.

The sanitary sewer flows are not substantially different that typical values.

FSR recommends:

- 200mm gravity sewer
- 125mm laterals

The 200mm sewer is planned at 0.4% slope. This is the minimum slope for the size of pipe. The objective for slope is to try to ensure flushing flows can be maintained. Flushing flow minimum velocity is 0.6m/s. Flow velocities are calculated at pipes flowing full when the depth of flow is 30% of the pipe diameter, but is calculated using actual velocities when depth of flow is lower. In the spreadsheet, both velocities are calculated, but it is not clear what velocity applies to each run. It is suspected that the actual velocities will be less than 0.6m/s in many pipes. A remedy for this is to increase the pipe slopes or to add more flow. Increasing the slope of the sewer may require more fill placement if minimum cover cannot be achieved. It is recommended that the consultant review the velocities in the pipe runs and identify the d/D

and which velocity value applies. It is also suggested velocities be designed to achieve the flushing flow velocity of 0.6m/s or higher.

Water

A 200mm local main is proposed with two connections to the existing system:

- One connection is to the existing 150mm main on John Street
- One connection is to the existing 300mm main on Elmwood Drive

Demands were calculated following MECP guidelines and population estimates reference Leeds and Thousand Islands guidelines.

Average, max day and peak hour flow calculations follow traditional MECP guidance.

Fire flow required is 4,000 L/min as determined by FUS method and assuming **1.5m setback from property line** (3m spacing between homes). This will be important to track through to design.

Available Fire flows were calculated as a resultant at each node using EPA modelling while maintaining a minimum 20psi pressure. They found no less than 6,000L/min is available. At the deadends at each of the cul-de-sacs. Greater available fire flows are found in the looped sections.

The reports demonstrates that water service can be provided to the proposed subdivision while meeting the minimum design standards.

The municipality will need to ensure that zoning limits the sideyard setback to 1.5m such that the 3m separations can be assured.

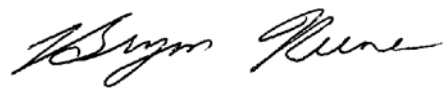
Summary

In summary our comments are related to the sanitary design:

1. Suggest infiltration be increased to 0.28L/s.
2. Clarify actual velocities. Which sections of pipe will have $d/D < 0.3$?
3. There appears to be no discussion regarding the capacities of the 600mm trunk, the pump station and the sewage lagoon. It is suggested the municipality confirm the ECAs for each to determine if there is sufficient capacity in the pump station and lagoon.

If you have any questions, please feel free to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryon Keene". The signature is fluid and cursive, with the first name "Bryon" and last name "Keene" clearly distinguishable.

Bryon Keene, P.Eng.
Jewell Engineering Inc.



November 24, 2025

Town of Gananoque
30 King Street East
Gananoque, Ontario
K7G 1E9

Attn: Mr. David Armstrong

**RE: Elmwood Subdivision – Detailed Design
Engineering Review of Stormwater Management Report
Jewell Project No.: 250-9941**

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Mr. Armstrong,

Jewell Engineering has completed a review of the stormwater management design for the Elmwood Subdivision. Several documents were submitted to assist our review including:

- Stormwater Management Report, Forefront Engineering, August 2025
- Memo – Floodplain Elevation and Setback, August 26, 2025
- Elmwood Subdivision – Water Supply Report, August, 2025
- Elmwood Subdivision – Sanitary Servicing Report, August 2025
- Traffic Impact Study, GHD, August 26, 2025
- Geotechnical Investigation, Malroz, September 11, 2025

The subdivision application would create 77 new single family dwelling lots with potential for 2 additional lots pending clearance of archaeological investigation. The land holdings include 11.58ha. Development will include the extension of full municipal services including storm sewers. An unnamed watercourse flows through the site and into what is described as a 'marsh'. The application will include channel improvements and wetland enhancements.

In summary, I have no concerns with the proposed SWM design. My detailed review comments are included below.

Forefront identifies the stormwater management plan includes mitigation for water quality. The treatment target is 'Normal', which is understood as achieving 70% TSS removal. Two OGS units are proposed that are



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demonstrated to treat 68% and 69% TSS respectively. Forefront proposes enhanced grass swales with rock check dams to provide final polishing. The swales will have 1m bottom width and 3:1 side slopes. The swale hydraulic calculations were included indicating a quality treatment flow rate of 0.23cms (at OGS2) and the geometry of the proposed swale would achieve the velocity treatment target of less than 0.5m/s. Naturally, the swale receiving the smaller flow rate of OGS1 would perform better than the tested swale.

While a calculation that would show the combined treatment effectiveness of the OGS/swale system was not included, one can conclude it would exceed the target removal rate given that the OGS units were just shy of the target without considering the swale treatment.

I have no concern with the water quality approach.

Forefront addressed the questions of mitigation for peak flows, as well as the directive to consider LID and water balance measures and concluded that all three would either not be required or of little value. Given that the site fronts onto the St. Lawrence River, I agree that quantity controls would not be warranted. The potential to use LID measures is Low, given the low infiltration soils, and the benefit of LID is not apparent and it is agreed that the site would not warrant LID measures. Similarly, water balance calculations would be pointless.

I have no concerns with quantity, LID and water balance.

Forefront also reviewed the conveyance of offsite drainage through the development and considered the potential backwater impacts on the constructed channel starting from a 100-yr water level on the downstream St. Lawrence River confluence. This analysis was completed using HEC-RAS in a 1D environment incorporating several conservative assumptions including:

- 1) The 100-yr peak flow in the unnamed watercourse would coincide with the 100-yr water level in the St. Lawrence River. This has a very low likelihood since the runoff event that would cause the 100-yr peak flow in the St. Lawrence River would have occurred weeks earlier. Thus, this chance of occurrence would be similar to the risk of a back-to-back 100-yr event in the watercourse. That risk is outside of the normal design consideration.
- 2) Runoff coefficients for the quality event were maintained from the 5-yr simulation. They could be argued to be lower for the quality event since the effect of the initial abstraction would be greater and the Rational Method ignores the initial abstraction.
- 3) Slightly higher values of Manning's n were used to represent non-ideal design conditions that tend to result in higher WSELs.
- 4) Peak flows were estimated using MTO IDF, 24-hr that includes 120mm of total precipitation. MTO IDF values are typically higher as compared with Environment Canada source stations. See Brockville at 115.5mm and Kingston at 100.6mm.

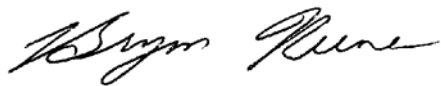
The 1D HEC-RAS results show no impact from drainage is expected to migrate outside of the channel limits.

The limits of flooding, including appropriate provision for setbacks for wave uprush for the St. Lawrence River have been represented on the drawings indicating an adequate building footprint is maintained outside of the flood risk hazard for each lot.

I have no concerns with the control of flooding impacts.

If you have any questions, please feel free to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryon Keene". The signature is fluid and cursive, with the first name "Bryon" and last name "Keene" clearly distinguishable.

Bryon Keene, P.Eng.
Jewell Engineering Inc.

July 22, 2026

Sent by email

Brenda Guy
Manager of Planning and Development
Town of Gananoque
bguy@gananoque.ca

**Re: Draft Plan of Subdivision Application SD2025-01 &
Development Permit Application DP2026-04
Elmwood Drive Subdivision – July 2026 Submission
Vacant Lot MacDonald Drive; ARN: 08140000202930000000
Town of Gananoque
St. Lawrence River**

Cataraqui Conservation have reviewed a second submission for the Elmwood Drive Subdivision including the draft plan of subdivision and development permit applications and updated supporting materials.

As noted in our February 18, 2026 comments, our main interests in the proposed subdivision are the avoidance of natural hazards through appropriate setbacks from surface water features present on and near the subject lands, protection of the function of coastal wetlands, provision of adequate stormwater controls and compliance with Ontario Regulation 41/24.

We offer the following comments for the consideration of the Town of Gananoque and applicant. These comments are provided based on Cataraqui Conservation's roles as a commenting agency responsible for natural hazards review for *Planning Act* applications and as administrator of Ontario Regulation 41/24: Prohibited Activities, Exemptions and Permits.

The following comments are further to our February 18, 2026 letter and identify whether the previous items have been addressed. Item numbering is consistent with our previous letter.

Surface Water Features / Natural Hazards

St. Lawrence River Shoreline

Flooding

1. **Partially addressed.** As previously noted, CRCA cannot permit alterations (e.g. fill / grading) below the 1:100 year flood level on the St. Lawrence River.

Through our previous comment we asked that the Draft Plan and Concept Plan show the 76.1 m 1:100 year flood level at the wetland / open space blocks (now Blocks 73

July 22, 2026

and 76). The flood line is included for lands east of Block 76 but not for Block 76 or 73. Following the 76.0 topographic contour on the plans, it appears there is filling proposed for Street 1, portions of Block 73 and portion of Block 76.

The Wetland Enhancement Plan includes some details for flood plain compensation in this location. From an initial review, it appears flood storage loss is proposed to be offset by excavating below the existing 76.1 m flood line. This approach is not supported by CRCA.

We appreciate the commentary from the applicant and consultant regarding the minor nature of the modifications and the interpretation of provincial and conservation authority policies. However, CRCA must apply policies consistently within our region and have consistently not supported development that requires flood plain compensation or offsetting on the St. Lawrence River for the purposes of land division. Our current regulatory policies do not permit flood plain compensation as a mechanism to enable development on the St. Lawrence River. The intent is to avoid cumulative flood storage loss where there are opportunities to direct development away from the hazard.

We are satisfied that Blocks 73 and 76 are sufficiently size to contain the hazardous area represented by the 1:100 year flood plain of the St. Lawrence River. We are also satisfied that, through further modifications made to the Draft Plan, the adjacent residential lots are sized to accommodate development outside the flood plain without the need to alter the flood plain.

It remains our recommendation that the plans be modified to avoid any modification to the flood plain of the St. Lawrence River prior to draft plan approval. However, should the Town see merit in the current Draft Plan, we recommend, at a minimum, that the following items be addressed:

- a) Can Street One be modified (e.g. shifted north slightly) to avoid filling below the 76.1 m flood plain.**
- b) Is the Town satisfied with a potentially encumbered park block (Block 73) due to the presence of the flood plain in this location?**

Erosion / Slope Stability

We continue to have no concerns as it relates to erosion and slope stability for the lots proposed with frontage on the St. Lawrence River. See recommended conditions section below.

Watercourses

Flooding

See recommended condition for designs details for the watercourse crossing for Street One in conditions section below.

July 22, 2026

2. **Partially addressed.** Additional commentary regarding hydrology and hydraulics of the watercourse are provided in the supporting materials.

The lowest lying lots (e.g. 37-40 from September 2025 Draft Plan) have been removed and the park block (Block 73) has been extended westwards. We're satisfied Lots 27 – 33 have developable areas outside hazardous lands associated with the watercourse.

It remains to be determined whether Cataraqui Conservation can permit the watercourse modifications envisioned in the development proposal. Minor alterations to address ongoing erosion and to achieve streambank naturalization were previously discussed as supportable. However, contrary to the consultant's responses, CRCA policy does not permit engineered flood conveyance measures, including flood-control channels, as appropriate tools for hazard management to enable new development. Policy 5.4.5.2 of the Board-approved Policies for Implementing Ontario Regulation 41/24 states:

In general, flood protection and bank stabilization works to allow for future/proposed development or an increase in development envelope or area within the regulatory flood plain shall not be permitted.

It remains our recommendation that the subdivision be designed so that there is appropriate development envelopes for all proposed lots based on existing conditions, and not on the basis of engineered modifications. Ideally, the west-east watercourse would be contained in a larger Open Space block (Block 76) based on the existing high water level (HWL) illustrated on the Concept Plan. This would also allow for retention of wetland cell MAM2-2 within the stream valley (see comments 6 & 7 below). In lieu of this, the development should incorporate appropriate development setbacks (e.g. 6 metres from the existing HWL) for the residential lots backing onto the watercourse. At present, it remains uncertain and unlikely that lots 24-26 could achieve this.

Should Town Council support the Draft Plan as proposed, they should be aware that it has yet to be demonstrated whether these lots (24-26) contain developable areas that meet existing policy requirements.

3. **Partially addressed.** Hydraulic modelling updated. Refer to comment above.

Erosion

4. **Partially addressed.** Clarification provided from engineering consultant / applicant that the lots (now 25-29) will be re-graded with engineered slopes for stability. Accordingly, the recommendation from the Geotechnical Investigation to retain vegetation on the south facing slope and at the toe of slope is unlikely to be met. **As per the Geotechnical Investigation, final grading plans should be provided for Malroz' review. See recommended draft plan approval condition, below.**
5. **Partially addressed.** Geotechnical Investigation updated to review the stability of the steep slope on the south side of the west-east watercourse. No concerns with regards to erosion and slope stability were found. Engineering consultant's response letter clarified

July 22, 2026

erosion issues are associated with channel of watercourse, not the larger ridge. **We recommend that the development incorporate a minimum rear yard setback for lots 37 to 50 to ensure a minimum 6 metre safe access allowance from top of slope is met for future buildings and structures on these lots.**

Coastal Wetland

6. **Partially addressed.** Some modifications to the Draft Plan, Concept Plan and Wetland Enhancement Plan have been made, including expanded Open Space and Park blocks to contain the Elmwood Drive wetland and a larger “enhanced wetland” shown. From the Draft Plan it appears the central MAS3-1 wetland cell will be mostly retained on Blocks 73 and 76, with some encroachment proposed from Street One at the north. However, the central MAM2-2 cell, which overlaps with the valley of the west-east watercourse is not captured in the open space block (76) as previously recommended by CRCA.

It remains our position that alteration to the central MAS3-1 cell can be avoided by shifting Street One to the north. We continue to make this recommendation.

Further to comment 2, we also continue to recommend that the central MAM2-2 cell, along the watercourse valley, be incorporated into Block 76.

These recommendations are intended to ensure no overall loss to the hydrologic function of the core wetland areas at the subject lands, to ensure a plan that is consistent with CRCA’s O. Reg. 41/24 policies and to minimize review, approval, monitoring and maintenance burdens on the Town and Cataraqui Conservation.

7. **Partially addressed.** The responses provided by the applicant / consultants do not speak to details of the proposed modifications to MAM2-2 and MAS3-1. We understand the northeast and northwest MAM2-2 cells will be removed – this was discussed with CRCA previously and is supportable. However, as noted in comment 6, **we continue to recommend Street One be shifted north to avoid infilling of the central MAS3-1 cell and recommend incorporating the “riverine” portion of MAM2-2 in Block 76.**

While Block 73 appears to contain most of the western extension of MAS3-1, we question the viability of the Block as a functional park as it would be highly encumbered by the wetland. A larger Block 73 (extending westwards) would address this issue.

8. **Partially addressed.** We continue to support the low impact wetland improvements, such as invasive species removal, plantings, habitat enhancement and interpretative signage. Further details of these improvements should be documented in a work plan that covers timing, costs, construction / installation details and responsibilities for short term and long term monitoring and maintenance. See recommended condition.
9. **Partially addressed.** The updated supporting materials and responses provide support for a reduced wetland setback of 15 metres. The setback has been incorporated into the Draft Plan with the exception of lots backing onto MAM2-2 along the stream valley and

July 22, 2026

the western extension of MAS3-1 at Block 73. **We recommend the 15 m setback from the full extent of the retained wetland cells discussed in comments 6 and 7 be incorporated into the proposed Development Permit By-law Amendment.**

10. **Addressed.** Concept Plan updated to show hydrologic connection. Clarification provided that no alteration intended at the connection point.

11. **Addressed.** See recommended condition regarding pathways in Block 73, 74, 75 and 76.

12. N/A. Street connection not proposed in current submission.

Stormwater Management

13. **Partially addressed.** Lots 37-40 have been removed from the Draft Plan. SWM report updated and confirmation of dwelling and road grades provided. See recommended conditions for final SWM report and plans below.

Ontario Regulation 41/24

As noted in our previous letter, Cataraqui Conservation permit approval under O. Reg. 41/24 is required prior to any work (development and site alteration) within 15 metres of the regulatory flood plain of the St. Lawrence River, within 30 metres of the watercourses and wetlands on and near the property and within 15 metres of the top of stable slope of the shoreline bluff and watercourse embankments on the subject lands. See recommended conditions for applicable subdivision agreement text below.

Conclusion / Recommendation

Several improvements to the Draft Plan and overall development concept for the Elmwood Drive subdivision have been made since the initial submission in December 2025. Overall, we do not object to the development concept as a whole, but some items remain unaddressed that relate to the preventative approach to natural hazards avoidance and regulatory permissibility.

Specifically, comment 1, relating to modification of the flood plain of the St. Lawrence River, comment 2, relating to alterations to a watercourse, and comments 6 and 7 relating to retention of core coastal wetland features remain to be addressed to the satisfaction of Cataraqui Conservation.

We also recommend that the proposed Development Permit By-law Amendment incorporate appropriate development setbacks from applicable features include the above-mentioned wetlands (15 metres), from the top of bank of steep slopes (6 metres), and from the existing high water level associated with the watercourse (minimum 6 metres).

Once remaining items are fully addressed, CRCA staff would be able to provide a full list of recommended conditions for draft plan approval. For now, should the Town of Gananoque

July 22, 2026

support the current Draft Plan, we recommend that the following conditions be included, as a minimum.

- 1) *That an engineered design supported by hydrologic and hydraulic assessment for the watercourse crossing at Street One be submitted to the satisfaction of the Town and CRCA.*
- 2) *That the subdivision agreement include text to the satisfaction of CRCA and the Town that requires purchasers of Lots 54 – 66 (from June 2026 Draft Plan) to retain natural vegetation (including trees, shrubs and plants) within 30 metres of the high water mark of the St. Lawrence River for erosion prevention and slope stability purposes, with an allowance for an appropriately sized clearing for shoreline access purposes as approved in consultation with CRCA.*
- 3) *That final grading plans for all lots backing onto steep slopes (including Lots 24-32 and 39 – 50 per the June 2026 Draft Plan of Subdivision) be reviewed by a qualified geotechnical professional in accordance with the recommendations from the Slope Evaluation section of the May 28, 2026 Geotechnical Investigation (Malroz Engineering Inc.).*
- 4) *That a detailed work plan for low-impact wetland improvements, including invasive species removal, enhanced plantings, habitat creation, interpretative signage be submitted to the satisfaction of the Town and CRCA and that the subdivision agreement specify responsibilities for construction/installation, monitoring and maintenance.*
- 5) *That any proposed pathways adjacent to or crossing any portion of wetland or watercourse on Blocks 73, 74, 75 and 76 (June 2026 Draft Plan of Subdivision) be subject to engineered design and environmental impact assessment to demonstrate no adverse impacts to the hydrologic and ecological function of the watercourse and wetlands to the satisfaction of the Town and CRCA.*
- 6) *That a final stormwater management plan be prepared by a qualified Professional Engineer and approved to the satisfaction of the Town and CRCA, and that appropriate text to implement its findings be included in the Subdivision Agreement.*
- 7) *That a lot grading and drainage plan and a sediment and erosion control plan be completed and approved to the satisfaction of the Town and CRCA, and that appropriate text to implement its findings be included in the Subdivision Agreement.*
- 8) *That the Subdivision Agreement includes text to the satisfaction of the Town and CRCA notifying the Owner that permission will be required under Ontario Regulation 41/24: Prohibited Activities, Exemptions and Permits, prior to commencing excavation, rough grading, stockpiling, etc. within 15 metres of the regulatory flood plain of the St. Lawrence River, within 30 metres of the watercourses and wetlands on and near the property and within 15 metres of the top of stable slope of the shoreline bluff on the subject land.*

July 22, 2026

- 9) *That the Subdivision Agreement includes text to the satisfaction of the Town and the CRCA to provide notice to purchasers of all Lots within 15 metres of the regulatory flood plain of the St. Lawrence River, within 30 metres of the watercourses and wetlands on and near the property and within 15 metres of the top of stable slope of the shoreline bluff that site alteration and construction (including but not limited to buildings, structures, filling and grading) on these lots will require permission under Ontario Regulation 41/24: Prohibited Activities, Exemptions and Permits prior to commencing these activities.*

Please provide notification of any decisions made by the Town with regards to the application.

If you have any questions, please contact the undersigned at 613-546-4228 extension 228 or by email at mdakin@crca.ca.

Yours truly,



Michael Dakin MCIP, RPP
Supervisor, Development Review

Cc: Applicant, via email

Re: File No. SD2025-01 APPLICANT: MHBC PLANNING LTD.



20 July 2026

To: Brenda Guy
Manager of Planning and Development
Town of Gananoque

Dear Ms. Guy,

Thank you for informing me about the Planning Advisory Committee meeting on July 28th. I have spent considerable time going through the development proposal. In this letter, I will explain why I have many concerns and questions about the proposal as it stands.

My wife and I moved to Gananoque from the West Island of Montreal in 2024. We chose to live near the area that is now scheduled for development because we love nature, and we appreciate the opportunity to walk on the Gananoque Trail. When we bought our house, we did not realize that the nearby woods and fields had no protection. It's notable that on the Hiking and Waterfront Trails page of its website, the Town of Gananoque continues to suggest that visitors should walk down "Elmwood Dr. to the street end and follow the trail through Grasshopper Park to the end of Arthur St."

Although part of the area of the proposed development is, or recently was, Grasshopper Park, the area is described in the developer's Planning Justification Report (Sept. 2025) as "vacant" with "no significant woodlands" and "not a provincially significant wetland." In spite of those damning phrases, the area does serve some very significant functions in ecological terms. Its trees and waters store carbon, release oxygen, improve air quality, and protect the surrounding neighbourhoods from flooding. In this era of rapid and devastating climate change, the future impacts of any proposed development need to be examined very carefully.

In preparing these remarks for the Planning Advisory Committee, I was reminded of a key statement in "Canada's 2030 Nature Strategy: Halting and Reversing Biodiversity Loss in Canada" (<https://www.canada.ca/en/environment-climate-change/services/biodiversity/canada-2030-nature-strategy.html>): "The diverse values of nature (monetary and non-monetary) tend to be treated as externalities in decision making, with nature often being placed behind economic development in terms of importance. Our economy is embedded in nature, and with the right tools we can protect nature, ensure economic prosperity, and enhance our well-being." The

document goes on to observe that “Municipal leadership can play an important role in either enabling or compounding challenges associated with habitat connectivity. Action is not only needed in large urban centres: many important habitats are located within or close to small municipalities, and enhanced planning to protect biodiversity in rural areas is crucial.”

Let me speak first about climate change and flooding.

A few weeks ago, the West Island of Montreal experienced intense flooding. Tim Thomas, the mayor of Pointe Claire from 2020 to 2024, wrote an open letter to two local newspapers after the June flooding. In that letter, he observed: “With climate change and the frequency of abnormal weather events and rainfall, our grey infrastructure (sewers and underground piping) is getting repeatedly overwhelmed. It is getting overwhelmed because we are building too much with the same supporting infrastructure [...] More toilets are getting flushed, more showers and baths are taken, more dishes are being washed, and more lawns and gardens are being watered. We are also building over wetlands and greenspaces – water absorption spaces gifted to us by Mother Nature. Because asphalt and cement are progressively covering areas where water can naturally be absorbed, the water has no choice but to go down sewers.”

(<https://www.facebook.com/OfficialTimThomas/posts/the-letter-below-was-published-in-todays-1510-west-and-suburbanla-lettre-ci-dess/1690290753105119/>)

Mayor Thomas gave a guarded thumbs-up to “planned development that minimizes or eliminates the destruction of greenspaces and that strategically reroutes or absorbs water using retention basins, permeable asphalt, green-lined street construction and other techniques associated with green infrastructure.” Even so, he concluded that such measures “may not be sufficient to overcome the enormity of the flooding potential created by climate change and overly rapid, inadequately planned development. Ultimately, cities must eliminate development that entails the destruction of trees, wetlands, and greenspaces that effectively sponge water [...] To continue to build rampantly, and without forethought and analysis of the increased stress on our infrastructure, is utterly irresponsible.”

I think the town of Gananoque needs to consider the potential physical and financial consequences of large-scale building in the area now scheduled for development. Consider the unfortunate experience of the small city of Dorval, which lies adjacent to Pointe Claire in Montreal’s West Island. The flooding that occurred there last month may have left taxpayers on the hook for about \$34 million, money that will be used (as one commentator put it) “to do the job that nature did for free.” Some years earlier, Dorval passed up the opportunity to protect a riverside area known informally as the McConnell Woods, an area which had served as a large natural sponge, absorbing millions of gallons of stormwater. Instead the woods were sold to a developer, being replaced by asphalt, concrete and other impermeable materials; and when the storm arrived in June, Dorval’s stormwater infrastructure could not cope. Sewage and stormwater backed up and went straight into homes and basements.

This is a cautionary tale, and I realize that the storm that hit the Montreal area in June was one of unusual severity. But unusually severe storms are now hitting much of Canada, the United States and the entire world with ever-growing frequency. To quote a *Time* magazine article from 30 May 2025: “Since 1999, there have been nine storms along the North Carolina coast that qualify as hundred or thousand year events. From 2015 to 2019, one suburb of St. Louis experienced three major floods, two of which met the criteria for hundred-year events. One study by the Montreal-based carbon removal project Deep Sky calculates that the frequency of deadly hurricanes has jumped 300 per cent, with 100-year storms now forecast to occur once every 25 years.” (<https://time.com/7289719/hundred-year-weather-events-happen-more-often/>) Even this may be underestimating the extent of the problem, or rather the crisis.

To return to the current proposal for development in Gananoque, I see on p. 21 of the Forefront report dealing with stormwater in the new development that the results of the hydrologic analysis are based on “a rainfall depth of 120 mm for the 24-hour 100-year storm event.” But in Ottawa on Canada Day this year, several neighbourhoods in the west of the city experienced rainfall far exceeding that amount, with one area recording rainfall of 167 mm in just five hours. A previous Ottawa storm in 2017 saw peak rainfall of 143 mm over 24 hours. The Montreal-area storm in June of this year resulted in rainfall of up to 170 mm. I wonder how accurate the hydrologic analysis in the current report can really be, given that it assumes a rainfall depth of only 120 mm in the case of an extreme storm event.

The Draft Background Report, prepared in September 2021 for Gananoque’s Official Plan, offers three scenarios for the growth in total precipitation expected in the town during the years between 2040 and 2060. If emissions increase only at a low rate, the report foresees an increase of 1.9 percent; the moderate emission scenario is for an increase of 4.5 percent; and the high emission scenario is for an increase in total precipitation of 8 percent. A hydrologic analysis that does not take such increased precipitation into account – relying instead of rainfall data from decades ago – is not an analysis whose conclusions can be entirely trusted. In that regard (and in others), I am surprised and very disappointed to see that the proposal now includes a reduction in floodplain setbacks from the St. Lawrence River and a reduction also in lot frontages for the 66 proposed single dwellings.

Flooding is, of course, a national problem, and this month the Canadian Climate Institute issued a notable fact sheet on the subject. It recommends “shifting development away from high-risk flood zones. To prevent placing more homes in harm’s way, provincial and municipal governments could restrict building in areas with high flood risk. Research shows that steering development away from high-hazard areas in the next decade can prevent between \$340 million and \$2 billion per year in new flood losses without limiting housing growth.”

<https://climateinstitute.ca/news/fact-sheet-climate-change-and-flooding/>

I would now like to move on to a few of the environmental impacts of the development.

The Town of Gananoque has an official Tree Canopy and Natural Vegetation Policy (Bylaw 2022-097), described as “an overarching document” that “applies to all properties and development, on public and private lands.” The bylaw stipulates that “development proposals ... should maintain and/or enhance the current tree canopy rather than reduce it.” I cannot find anywhere in the documents submitted by the developer an estimate of how many trees will be destroyed under its plan, although I note that the tree species listed as now growing on the site include balsam fir, silver maple, red maple, butternut, sugar maple, Manitoba maple, white birch, bitternut hickory, shagbark hickory, white ash, green ash, Eastern red cedar, black walnut, Eastern white pine, white oak, bur oak, Northern red oak, Eastern white cedar, and black locust.

This is an impressive array. And I wonder how the proposed development can possibly “maintain and/or enhance the current tree canopy.” The Forefront stormwater report states, “The subject site is proposed to have a 50% imperviousness.” I take this to mean that only half the total area of the site will be covered by grass, trees, bushes or water. The predominant ground material on the site will be asphalt. I question whether subdivisions such as the one outlined in the current proposal are appropriate for a town that is located within the Frontenac Arch Biosphere region, which UNESCO has recognized as being of international conservation importance. The Frontenac Arch Biosphere is featured prominently on Gananoque’s own website. Surely it would be hypocritical to highlight the purposes, the responsibilities and the uniqueness of the Frontenac Arch Biosphere for reasons of tourism – yet to ignore it in all other respects.

I would remind the Planning Advisory Committee that, to quote Bylaw 2022-97, “the Municipality will apply creative planning approaches designed to protect and enhance its tree canopy and natural vegetation.” Canada’s 2030 Nature Strategy, which I quoted earlier in this statement, notes that “Many municipal conservation actions also contribute to mitigating and adapting to climate change, such as tree cover that reduces the urban heat island effect, protects against flooding caused by extreme precipitation, shades buildings thereby reducing their energy consumption, and sequesters and stores carbon.”

On a different but related note, I have to say that I find the environmental report by WSP Canada to be seriously deficient in several respects. First of all, it uses the studies made in 2020 by Ecological Services in some places but rejects those studies in others. What is the justification for this? If the studies were carried out properly, the findings should be included across the board. If the studies were not conducted properly, the findings should not be used at all.

The most important example of this involves bats. Among the mammal species recorded in the surveys, the rarest and most seriously threatened are several species of bats. The 2020 surveys found multiple proofs of the Northern Myotis and Silver-Haired Bats, and recorded a single pass of the Small-Footed Bat. Because these were not found in 2024, they do not feature on WSP’s list of wildlife species.

Why is this significant? Because those three species continue to be named on the latest Protected Species in Ontario list (filed 27 March 2026; <https://www.ontario.ca/laws/regulation/r26060>). Of the four bat species that were recorded in the 2024 survey, three are endangered. Indeed, of the eight bat species that occur in Ontario, seven are listed as endangered – and six of those endangered species have been found in the bat surveys conducted here in 2020 and 2024. It is clear that the area scheduled for development now provides significant bat habitat, particularly thanks to the likelihood of maternity roosts in snags and dead trees. Even though a few potential bat boxes are mentioned in the report, the committee should be aware that the success rate of bat boxes is generally only about 20 percent, and that they are unlikely to attract and maintain bat populations where bright artificial lights are present.

A further deficiency in the Environmental Assessment report involves birds. Its total of 39 bird species (including cormorants, gulls, mallards and other waterbirds) is frankly absurd. The Kingston Field Naturalists website contains a list of 244 bird species that are likely to be seen annually in the Kingston area, including 29 warblers, 16 species in the sparrow family, 9 woodpeckers, 8 species in the blackbird family, 8 species in the finch family, 7 species of flycatchers, and 7 species of thrushes: <https://kingstonfieldnaturalists.org/kingston-250-bird-checklist> Most of these species are likely to occur seasonally in the area scheduled for development, and a good number of them breed here.

On a walk this morning (July 20), in the Grasshopper Park and John St. areas, my wife used the Merlin app and recorded the songs or calls of four bird species that fail to appear in the wildlife species list in the environmental report (Nashville Warbler, Merlin, Yellow-rumped Warbler, Tufted Titmouse). There are several other species of birds (e.g., Carolina Wren, Pileated Woodpecker, Northern Yellow Warbler) which we have often observed in the area scheduled for development; these too fail to appear in WSP's species list.

The WSP species list mentions one species of bird (Chimney Swift) that is listed as threatened. However, it does not include the following species, all of which are classified as “at risk” and which appear on the Protected Species in Ontario list (<https://www.ontario.ca/page/species-risk-ontario#section-1>): Wood Thrush, Canada Warbler, Eastern Wood-Pewee, Olive-Sided Flycatcher, Bobolink, Barn Swallow. I cite these species at risk because they have all have been recorded this year on the Gananoque Trail: <https://ebird.org/hotspot/L5203454/bird-list> Of those six species, my wife and I have personally observed the Olive-Sided Flycatcher (in 2025), the Barn Swallow (in 2026) and the Bobolink (in 2026) in or adjacent to the area scheduled for development. The Bobolink is now classified as “threatened” because its numbers are in serious decline.

In short, the environmental report is radically inadequate in its assessment of birds. I cannot say whether its assessment of other types of fauna and flora is any better. I will, however, note that the WSP species list does not include the Gray Ratsnake (sometimes known as the Black

Ratsnake). But in July 2024, shortly after we had moved to Gananoque, our next-door neighbour on Elizabeth Drive found a Gray Ratsnake in her garden. (Her son caught and relocated it beyond the town.) We have no way of proving that the snake arrived from inside the area scheduled for development, but it is highly probable. The Gray Ratsnake of eastern Ontario is a threatened population that remains on the latest Protected Species in Ontario list (<https://www.ontario.ca/laws/regulation/r26060>). It enjoys federal protection under the Species At Risk Act. And it is named in Section 3.6.4.1, Endangered and Threatened Species, of Gananoque's Draft Official Plan Update of 2024. This document states, "It is important to protect the significant Habitat of Endangered and Threatened Species found within the Town."

One of the nine guiding principles in the Draft Official Plan Update is this: "We will protect our natural environment." Among the seven criteria that may be used to evaluate development applications are "impacts of the proposed development of surrounding natural features and areas." Other criteria include "the provision of adequate ingress/egress, off street parking and loading facilities, and safe and convenient vehicular circulation" and "the impact of traffic generated by the proposed development on the road network and surrounding land uses."

I have discussed the proposed development with other people who live on the surrounding streets, and I share their concerns about the greatly increased traffic flow. Children who now play freely on Elizabeth Drive will be unable to do so safely because of the increase in traffic. The volume of traffic stands to create a type of road congestion normally associated with larger communities, and this will only be heightened by the rise in the projected amount of housing shown in the revised version of the developer's plan. Trucks and other heavy vehicles required in the construction process will have to make 90-degree turns to get onto both Elmwood and Churchill Drives. The volume of noise, the dust, the vibrations and the blasting will cause a serious downturn in the quality of life of hundreds of Gananoque residents for an undisclosed amount of time.

The Cataraqui Region Conservation Authority undertook a review of Gananoque's Official Plan in 2018, and recommended several updates that would better reflect the natural environment and natural heritage features present in the town. One of these updates was to recognize areas of natural heritage not located along the waterfront, such as woodlands and watercourses, and limit if not prohibit development in or adjacent to these areas. Another of the Conservation Authority's recommendations was the use of low-impact development practices in both new and redeveloped construction. Unfortunately, what I see in the developer's proposals are mostly high-impact practices, especially in the large volume of impervious material that will dominate the site.

I realize, in the end, that the area in question is zoned for residential purposes, and some development there may be inevitable. But I do not accept that a 103-unit subdivision, one that involves turning half the site into asphalt and concrete, is appropriate for a town in the Frontenac

Arch Biosphere region – particularly when the area in question borders the St. Lawrence River and contains significant wildlife habitat, and particularly too when we are living in the midst of a climate crisis.

The issues I have raised in this letter are, to my mind, more than sufficient for the Planning Advisory Committee to defer a vote on the application. There are many questions that I believe need answering before approval should be given. Those questions, from my perspective, include the following:

Has the Cataraqui Conservation Authority given its approval to the latest version of the developer's plans, especially in light of the reduction in floodplain setbacks compared to those in the original proposal?

Is the town confident that the stormwater protections outlined in the developer's proposal are sufficient, given the rapidity of climate change and the ferocity of extreme weather events? Do these issues cast a shadow over the developer's request to reduce the floodplain setbacks and the lot frontages?

While I like certain elements in the developer's Wetland Enhancement Concept Plan, I also have some queries about it. How can the town be sure that the "concept plan" will be executed in full? Are there any guarantees that the plan will prove to be anything more than a concept? What happens if the plan is altered during the construction process, or is found to be unworkable?

What is the construction route or routes? The use of heavy trucks is likely to damage the road surfaces of nearby streets: is the town ready to pay for the repairs? Will any work be done in advance of the construction, so as to lessen the chance of accidents at intersections where a 90-degree turn is required?

How will the subdivision enhance the town's urban canopy? Is the proposed development not in violation of Gananoque's own Bylaw 2022-097?

Given the failings I have noted in the Environmental Impact Assessment report, does the Planning Advisory Committee have full confidence in its findings?

Thank you for the opportunity to outline my concerns and questions.

Yours sincerely,

Mark Abley

From: [ann beer](#)
To: [Brenda Guy](#)
Subject: 205 Elmwood Subdivision Plan
Date: July 20, 2026 9:56:30 PM
Attachments: [Wild bird loss .docx](#)

 Dear Ms. Guy, Members of the Planning Committee, Mayor and Council Members,

RE: SD2025-01

<https://www.gananoque.ca/town-hall/138/notice-of-complete-application-proposed-plan-of-subdivision-and-class-iii-development-permit>

“205 Elmwood” area.

To destroy a mature and ecologically rich woodland and meadow for a housing development, at this time when biodiversity loss is so profound, seems a very serious decision. I am writing to ask that the environmental consequences of the proposed subdivision be fully considered. There are many areas of concern but I will focus here on the negative impact on bird species.

“The latest edition of *State of the World’s Birds* paints the most concerning picture for nature yet. Nearly half of the world’s bird species are now in decline, with only six per cent having increasing populations. One in eight species (or 1,409 species in total) are now threatened with extinction. Nearly three billion birds are estimated to have been lost since 1970 in North America alone, and a further 600 million have been lost in the European Union since 1980, an area five times smaller.”

<https://www.birdlife.org/news/2022/09/28/state-of-the-worlds-birds-2022-paints-most-concerning-picture-for-nature-yet/>

The Cornell Bird Lab states that: “Nearly 3 Billion Bird [have] Gone Since 1970”
<https://www.birds.cornell.edu/home/bring-birds-back/>

This scientific article contains more details:
<https://www.birds.cornell.edu/home/wp-content/uploads/2019/09/DECLINE-OF-NORTH-AMERICAN-AVIFAUNA-SCIENCE-2019.pdf>

Further loss of habitat, wherever it occurs, can only put more stress on those birds remaining. Nesting and feeding sites will be destroyed. It is ironic that your report describes the area as “currently vacant” when in ecological terms it is exactly the opposite — rich in natural trees, plants, animals, birds, and other creatures that we can ill afford to lose.

Here is a list of the birds I have seen, heard, or noted on the Merlin Bird App for the forested area below Elmwood that borders the short section of the Gan Trail towards Arthur Street (near William Street), the gravel section of east John Street leading to the meadow by the St. Lawrence River, or flying overhead near these areas.

These observations are from my regular morning walks in the last three months, from my home at 175 Elizabeth Drive down to Hal McCarney Park, via that short section of the Gan Trail.

**** Please note that this list is much longer than the list presented in the Environmental Report on page 77.****

American Crow
American Goldfinch
American Herring Gull
American Robin
Bald Eagle
Barn Swallow
Belted Kingfisher
Black-Capped Chickadee
Blue Jay
Bobolink ***considered Threatened**
Brown-Headed Cowbird
Canada Goose
Carolina Wren
Chipping Sparrow
Common Grackle
Common Loon
Common Raven
Common Tern
Common Yellowthroat
Dark-Eyed Junco
Double-crested Cormorant
Downy Woodpecker
European Starling
Gray Catbird
Great Blue Heron
Hairy Woodpecker
House Finch
House Sparrow
Mallard
Merlin
Mourning Dove
Mute Swan
Nashville Warbler
Northern Cardinal
Northern Flicker
Northern House Wren
Northern Yellow Warbler
Osprey
Pileated Woodpecker

Red-breasted Nuthatch
Red-eyed Vireo
Red-shouldered Hawk
Red-tailed Hawk
Red-winged Blackbird
Ring-billed Gull
Ruby-Throated Hummingbird
Song Sparrow
Tree Swallow
Tufted Titmouse ***Considered rare**
Turkey Vulture
White-breasted Nuthatch
Yellow-rumped Warbler

I have no doubt that there are far more bird species present in the area than I have noted here.

Thank you for your attention to this message.

Yours sincerely

Ann Beer



To: Mayor, Members of Council, and Planning Department

Re: Opposition to Proposed Development and Requested Variances (Town Document SD2025-01)

We are writing to express our strong opposition to the proposed development of 66 single-family homes and 37 condominium units on the vacant lands identified in Town document SD2025-01, as well as the developer's request for reduced setbacks from neighbouring properties and the floodplain.

We have significant concerns about the long-term impacts this development will have on our community and the environment.

1. Loss of Wildlife and Natural Habitat

Although the developer's environmental report concludes there is no significant wildlife present, residents have consistently observed deer, foxes, rabbits, osprey, owls, turtles, songbirds, turkeys, loons, and other species using these lands. The absence of findings in a single study does not mean the habitat lacks ecological value, and the report's conclusions appear inconsistent with lived experience.

We understand Cataraqui Conservation has completed a report that is not yet available. Once released, we request an opportunity to review and assess it. We respectfully ask Council to require an independent review of the environmental assessment before any decisions are made.

2. Floodplain Concerns

The developer is requesting relief from required floodplain setbacks. These regulations exist to protect current and future residents from flooding, erosion, and environmental damage. Reducing setbacks increases hard landscaping and impervious surfaces, which in turn elevates flood risk for both the new development and existing homes.

We are also concerned that the current floodplain analysis does not adequately account for global warming or increasingly severe weather events. Flooding in Ottawa in June 2026 is a recent example of damage worsened by outdated engineering assumptions. We urge Council to deny any variance that compromises established floodplain protections.

3. Increased Traffic and Safety

One of the proposed roads would be located directly in front of our home, dramatically increasing traffic volumes, noise, speeding, and safety concerns for residents, pedestrians, cyclists, and children. Activities such as street hockey, basketball, biking, and scooter riding would no longer be safe.

Our neighbourhood roads were not designed for this level of traffic. We are concerned about congestion, emergency vehicle access, and the overall character of our community.

Construction traffic presents additional risks. These roads cannot safely accommodate hundreds of heavy-duty trucks and machinery over many years. Their weight and turning radius will cause significant damage and congestion. Who will be responsible for these repairs — taxpayers?

Depending on the developer's construction schedule, heavy truck traffic could continue for a decade or more, leaving both existing and future residents dealing with deteriorating road conditions.

The current traffic assessment does not include several affected intersections, including Elizabeth & Pine, Elmwood & MacDonald, and Elizabeth & Churchill. It also evaluates only post-construction traffic, not the heavy construction load that will persist throughout the development period.

4. Reduced Setbacks

The requested reduction in setbacks would place homes closer together than intended under zoning regulations. These standards protect privacy, reduce overcrowding, preserve green space, and maintain neighbourhood character. Granting these variances would set an unfortunate precedent and negatively affect surrounding homeowners.

5. Impact on Existing Residents

This proposal will significantly alter the character of our neighbourhood. Many residents purchased homes with the understanding that this natural area provided separation, green space, and privacy. The proposed density, road

placement, and variances would substantially reduce the enjoyment and value of our properties.

Our water and sewer system is already at maximum capacity, as evidenced by the increasingly frequent sewer odours. Adding this level of density will worsen existing infrastructure issues.

We respectfully request that Council consider the interests of current residents alongside those of the developer.

Request for Deferral

We ask that this proposal be deferred to allow residents adequate time to assess its full impact. While documents are available on the Town website, they are difficult to locate and incomplete. The development appears to be moving forward on an unrealistic timeline that does not allow the community sufficient time for due diligence.

For these reasons, we ask Council to defer the requested variances and require any future development to fully comply with existing environmental protections, floodplain regulations, and setback requirements.

Thank you for your time and consideration.

Tim and Jacquie Corbett



From: [Penny Kelly](#)
To: [Brenda Guy](#)
Subject: FW: planning committee
Date: July 21, 2026 10:32:43 AM

Over to you.

Penny

From: Stewart Creagh [REDACTED]
Sent: July 21, 2026 7:33 AM
To: Penny Kelly <clerk@gananoque.ca>
Subject: planning committee

[REDACTED]

Dear Planning Committee members,

I am writing to respectfully request that the approval of the development permit be deferred until additional information and clarification can be provided regarding several important aspects of the proposed project.

While I recognize the need for thoughtful community growth, I believe there are several outstanding questions that should be addressed before a final decision is made.

Specifically, I would appreciate clarification on the following:

- What is meant by the statement that the development will have "minimum impact on wetlands"? What assessments or mitigation measures support this conclusion?
- Was a traffic impact study completed for the King Street and Elizabeth Street intersection? If so, what were the findings regarding current and projected traffic volumes, congestion, and pedestrian safety?
- What evidence demonstrates that there is sufficient demand for this

proposed housing development within the community?

- What demographic is this development intended to serve? For example, is it designed for families, seniors, first-time homebuyers, or another segment of the population?
- Will consideration be given to preserving portions of the existing tree line, rather than clear-cutting the site? Maintaining a natural buffer would help protect wildlife habitat, preserve the area's character, and reduce the visual and environmental impacts of the development.

Given the significance of this proposal and its potential long-term impacts on our community, I respectfully request that the planning committee defer approval of the development permit until these questions have been fully addressed and made available to the public.

Thank you,

Stewart Creagh

[REDACTED]

[REDACTED]

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To: [Brenda Guy](#)
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Thank you,

Stewart Creagh

[REDACTED]

[REDACTED]

Brenda Guy

From: Jim Joe [REDACTED]
Sent: July 20, 2026 2:55 PM
To: Brenda Guy
Cc: Jim Joe; Giz B
Subject: RE: Proposed Plan of Subdivision and Class III Development Permit

[REDACTED]

Hi Brenda,

We are requesting a deferral for the approval to proceed with the “Proposed Plan of Subdivision and Class III Development Permit” for the vacant lands south of Elmwood Drive and/west of Arthur Street, LEEDS CON. 1 pt. 16 RP 28R-15673 PARTS 1 TO 25 TOWN OF GAGNANOQUE, for the reasons noted.

Severe Traffic Congestion

The draft plan of the subdivision shows that all traffic into the proposed subdivision from the major artery King St E will be via Elizabeth Dr onto Pine St E and then Elmwood Dr and then an option to take MacDonald Dr. There currently are approximately 110 residences that are accessed from this route. The Castle Grove development that is in progress, is adding 105 new residences. The Propose Plan for vacant lands south of Elmwood Dr and/west of Arthur St will add another 103 residences. Overall tripling the existing traffic on this route and creating congestion starting on King St E. Congestion at the intersection of King St E and Elizabeth Dr will create bottlenecks that will seriously impact residents, emergency vehicles and school buses.

The Draft Plan of the subdivision does not show that it will be accessed from extensions of Arthur St and/or John St from William St S. This would allow a great easing of the congestion that will occur at the King St E and Elizabeth Dr intersection.

The streets of Elizabeth Dr, Elmwood Dr, Pine St E, MacDonald Dr are not currently developed to support the additional traffic that will occur. There is extensive use of people strolling, walking dogs and children playing these streets, the additional traffic on these streets puts them at risk. Parking on these streets is already an issue, with cars parking on residential lawns and this will exacerbate traffic congestion.

During the construction phase, the addition of construction vehicles, workers vehicles and other traffic congestion and parking on existing streets will be significant. This will impact the current residents and emergency vehicles.

Environmental Impacts

It is understood that an Environmental Impact Assessment has been completed and it takes into consideration the 100 year flood event plan. We need to know if the 100 year flood event plan is based on historical data or if it takes into consideration the projected impact of global warming, the increase of precipitation this area has seen in recent years and the high levels of rainfall in a short period of time. We have seen recent flooding in many areas of southern Ontario.

Electrical Grid

In the past 9 months there have been at least 4 significant unplanned power outages in Gananoque. Has it been confirmed that the additional residences will not have a negative impact on the power grid and enhance that risk of unplanned power outages?

Construction Noise and Other Impacts on Existing Residents

This proposed development will result in significant changes to the beautiful vacant land, and will result in blasting, hammering and large trucks going in and out.

Will there be reasonable start and end times when construction can proceed. Residents need to know that they will be able to sleep to a reasonable time and when they come home from work that they can relax without excessive noise, not to forget the stress on pets in these homes. People need to know they can leave and arrive from work without construction vehicles or construction workers vehicles blocking their driveways and parking spaces.

Blasting and hammering can put the integrity of existing properties at risk. What has been setup for the remediation of exterior and interior damage that may happen. There should be no financial impact to the property owner and speedy remediation.

Last year there was a power upgrade on Elmwood Dr. This resulted in digging up or damage to lawns that went into the resident's property. The reseeded of lawns was haphazard and no recourse was available. People tried to contact the company that performed the work and the township for remediation with no success. The township is responsible to the residents, will they setup a process to ensure that issues all are properly addressed.

The Request

For these reasons, I respectfully request that the decision to approve the "Proposed Plan of Subdivision and Class III Development Permit" for the vacant lands south of Elmwood Drive and/west of Arthur Street, LEEDS CON. 1 pt. 16 RP 28R-15673 PARTS 1 TO 25 TOWN OF GAGNANOQUE be deferred until these concerns are addressed. I will be attending the July 28 meeting and wish to be notified of any upcoming public hearings or meeting.

Regards,

James and Gisele Goddard

July 18, 2006

Ms Brenda Guy
Manager of Planning and Development
Town of Gananoque
30 King Street East
Gananoque, Ont

Dear Ms Guy:

I am writing to you to express my concerns about the new residential subdivision on lands south of Elmwood Drive and west of Arthur Street, Lot 16 RP 28R-15673 Parts 1-25. Given the sparsity of specific and concrete information and the limited sharing of what is available, I think it is appropriate to focus on the areas of concern below and request information. It is also important for the responsible person to provide information and answers to the following questions.

Vehicles traffic to be expected in the development:

Using the most recent Canadian household vehicle ownership data, a reasonable planning estimate is about 1.5 motorized vehicles per household. Based on these statistics, one would expect approximately 155-165 motorized vehicles in the new development, all of them accessing their homes, especially using Elmwood and MacDonald-Arthur as primary access.

The Town's Road Needs Study (2011) includes AADT (Annual Average Daily Traffic) values for certain road segments, but not for the entire residential area. For example:

- MacDonald Drive (Elmwood Drive to 175 m east): about 500 vehicles/day.
- Elizabeth Drive (Churchill Drive to Pine Street East): about 800 vehicles/day.
- Churchill Drive (near Elmwood/Elizabeth): about 450 vehicles/day.

The Traffic Impact Study prepared for the development recognized that Elizabeth Drive, Elmwood Drive, Arthur Street and the proposed Elmwood and Arthur extensions are key access points to this part of Gananoque, but it focused on intersection performance rather than reporting total traffic volumes on all three streets.

Has the town estimated the wear-and-tear on these streets and the cost to taxpayers?

Construction traffic:

The actual construction will extend from start date to many months – perhaps more than a year. For a residential development of this size, construction traffic is typically much more noticeable than the long-term residential traffic because of the number of heavy vehicles involved. The exact numbers depend on whether the homes are detached houses, townhouses, or apartments, but the following is representative of a subdivision of this size: 2,000–4,000 heavy truck movements over the servicing/construction period **is** a reasonable expectation.

Phase 1 – Site servicing (2–6 months)

This is usually the heaviest period for trucks; specifically, dump trucks hauling soil and rock, gravel trucks hauling fill, ready-mix concrete trucks, excavators, bulldozers, graders, delivery trucks and so on. During busy weeks, it would not be unusual to see 30–80 heavy truck movements per day while peak days during excavation or paving may exceed 100 truck movements.

Phase 2 – House construction (12–24 months or longer)

Heavy truck traffic decreases, but there is a steady stream of construction vehicles, concrete trucks, delivery trucks, etc. A development of 100 plus homes could have 50–150 worker and contractor vehicles on busy days, 10–30 delivery trucks per day, depending on the construction stage.

Traffic impacts

If construction traffic uses local residential streets, residents may experience Increased noise from diesel engines and backup alarms, dust during dry weather, temporary delays when large trucks turn or back into the site, faster deterioration of pavement, particularly if roads were not designed for repeated heavy loads and increased concerns for pedestrians, cyclists, and school children.

If the only practical access to the site were via Elizabeth, Elmwood, or MacDonald, residents could expect substantial heavy-truck activity during the service phase. If, however, construction access is provided directly from King Street East or another arterial road, the impact on those residential streets would be much lower.

Prior to any approval, the Town should require the developer to submit a Construction Traffic Management Plan identifying all approved truck routes, hours of operation, road protection measures, dust control, street cleaning, and responsibility for repairing any damage to municipal roads. Construction traffic should be directed to arterial roads as practical and should avoid established residential streets.

How does the planning committee propose to ensure these mitigations and safety procedures?

Impacts on sewer and water management:

An additional 100 or so dwelling units could add approximately 200–300 new residents. Therefore, roughly 40,000–75,000 litres of wastewater per day, assuming average indoor water use of about 200–250 litres per person per day.

What evidence does Council or the citizenry have that a Sanitary Sewer Capacity Analysis been completed? Does the existing sewer on Elizabeth Drive, Elmwood Drive, or MacDonald Drive have sufficient reserve capacity? Will any sewer mains or pumping stations need to be upgraded? Who pays for any upgrades - the developer or existing taxpayers? Will construction require temporary shutdowns or bypass pumping that could affect existing residents?

Before final approval, the Town should confirm that sufficient sanitary sewer, wastewater treatment, water supply and waste collection capacity exists to serve the development without reducing the level of service provided to existing residents or requiring existing taxpayers to fund necessary upgrades.

Is the town planning to deal with these issues. If so, how and what cost?

Construction hours/noise reduction/air cleanliness:

Active construction activity

Construction time should be limited to:

- Monday to Friday: 7:00 a.m. to 6:00 p.m. only.
- Saturday: 8:00 a.m. to 4:00 p.m. only
- Sunday and statutory holidays: No construction, except for emergencies.

Heavy truck restrictions: no heavy truck deliveries before 8:00 a.m. or after 5:00 p.m. and no heavy trucks on Sundays or holidays. Particularly noisy activities such as blasting, drilling, pile driving, pavement milling, concrete saw cutting be restricted to 9:00 a.m. to 4:00 p.m.

Dust and road cleanliness: the developer should be required to sweep public roads whenever mud or debris is tracked onto them, control dust with water or approved dust suppressants and wash truck tires before leaving the site.

Resident communication: residents should receive at least **48 hours' notice** before planned road closures or utility interruptions and contact information for a site superintendent who can respond promptly to concerns.

Road protection: the Town should inspect and document the condition of Elizabeth Drive, Elmwood Drive, and MacDonald Drive before construction begins and require the developer to repair any damage caused by construction traffic at its own expense.

Noise control: engines should not be left idling unnecessarily. Perhaps a stand of trees could separate the construction site and existing neighbourhoods.

As a condition of approval, the Town should require a Construction Management Plan establishing construction hours, designated truck routes, noise and dust controls, road cleaning, advance notice of service interruptions, and full responsibility by the developer for repairing any damage to municipal roads. All construction traffic should be required to use the designated access route identified by the Town and be prohibited from using residential streets unless no reasonable alternative exists. This can significantly reduce the impact on existing neighbourhoods.

Are these measures being imposed on the developer?

Run-off to the St Lawrence

Before development, rain falling on forests, fields, and lawns largely soaks into the ground, replenishes groundwater and is taken up by vegetation. After development, much of that rain falls on roofs, roads, driveways and sidewalks. This creates much more runoff that reaches storm sewers quickly. For 100 plus homes, the amount of impervious surface could increase by 3 to 5 hectares.

Climate change has increased the frequency and intensity of heavy rainfall events in eastern Ontario. Council should be satisfied that this subdivision's stormwater management system has been designed using current climate projections, will not increase downstream flooding or erosion, and will

adequately protect the water quality of the St. Lawrence River. Long-term maintenance responsibilities should also be clearly established before approval.

The decision to decrease the waterfront on the St Lawrence is a major and dangerous flaw in the planning. The 30-meter frontage must be maintained.

Furthermore, was the stormwater management design based on current climate-change rainfall projections rather than historical rainfall records? It must not rely on past statistics.

Who will be responsible for maintaining the stormwater management facilities in perpetuity—the Town or a private entity?

Full disclosure to all citizens of the town:

When and how will the information citizens and taxpayer require be shared with the general public and how will these concerns be addressed?

Respectfully yours,

Paul Heppelle

A black rectangular redaction box covering the signature area.

CC: His Worship John Beddows
Councillors Colin Brown, Matt Harper, Patrick Kirby, Anne-Marie Koiner, Vicki Leaky and Dave
Osmond
MPP Steve Clark, member for Gananoque

TO: PLANNING DEPARTMENT att: Trudy Gravel

Re: Submission for PAC on File No. SD 2025-01 & DP2026-04

I believe that this proposed subdivision with its enhanced density request etc. is the largest new build for Gananoque and as such deserves very careful consideration

especially since the subject property is an environmental sensitive area. Despite the fact that I studied the supplied documentation, I still have major unanswered questions and concerns.

1. Has the Conservation Authority signed off on the reduced flood plain setbacks? On the creek setbacks nature will find it difficult to maintain a sustainable ecosystem if the requested reduction is accepted. The proposal speaks of "enhanced" changes to the creek—specifically what and how?
2. STORM WATER MANAGEMENT. The study does not take into account that adjacent areas of Gananoque funnel ground water to this wetlands sink. I have spoken with several of my neighbours who have had problems with wet basements in the past and with even more episodes of heavy rainfall in the future will the proposed drainage system be adequate? I believe that there is a Ministry that regulates the St. Lawrence river and controls the water level and quality. There is a regulation that states that developments cannot increase outflow beyond what is currently reaching the St. Lawrence without approved mitigation. Has this approval been given?
3. What is the fire code requirement for the maximum number of units allowed on a cul-de-sac (Road 2) especially as "the future development of Lots 55,56 and 57" is requested?
4. What is the phasing for the subdivision development? How many years of disruption? Will the Town change the bylaws which presently allow construction noise from 7 a.m. to 9 p.m. 7 days a week and holidays?

5. What is the construction route and what mitigation factors are proposed for noise, dust, and vibration? Possible existing routes all have 90 degree turns hard for large trucks and equipment to navigate safely. If Elmwood is the designated route, will the Town build a sidewalk BEFORE CONSTRUCTION STARTS to assure the safety of pedestrians along this route?
6. Heavy truck use will damage the proposed construction route(s) and who will pay for the repairs—the Gananoque taxpayers?
7. The density calculations are way off, especially for townhouses and multiples 37 units @ 2.03 PPU = 75. Is that one child for every 5 townhouses? The numbers for single dwellings: 66 units @ 2.63 = 174. Families now often are multigenerational and families who can afford singles often have teenagers.
8. most units will have 2 vehicles as usually both parents work. Many cars will be parked on the street (on both sides?) leading to dangerous congestion. And what about winter and snow clearing? Do we really want A FUTURE GANANOQUE TO LOOK LIKE THIS?

Respectfully submitted by: Margueritta Kluensch, [REDACTED]

M. R. Kluensch



From: [Lana Marion](#)
To: [Brenda Guy](#)
Subject: Concerning the proposed subdivision on lands south of Elmwood Dr and west of Arthur St
Date: July 19, 2026 1:38:28 PM

Hello Brenda,

My name is Lana Marion and I am a resident of 124 Maplecroft Court, Gananoque. I am writing to you today to express my concerns about the proposed development of the lands to the south of Elwood Drive and west of Arthur Street.

My neighbours and I recently received letters informing us of the scheduled public meetings about the complete application for said development. We were surprised (I have seen no other notifications of any kind concerning development in this area) and dismayed to learn of a large subdivision such as this going into an environmentally sensitive area, and so close to the St. Lawrence River. I am writing to respectfully request a deferral to allow time for myself and my neighbours to better inform ourselves about the plans and put forth our concerns thoughtfully.

We realize the province has mandated more housing and the town needs and welcomes new residents, however, with the little that I was able to find out about this proposal once I received the letter, I sincerely feel more studies are needed to be sure that this development is constructed carefully and with thought to the future.

Among our questions and concerns are:

- Has the Cataraqui Region Conservation Authority been fully informed of the proposed plans? If so, have they produced a responding report, and can the public have access to the report?
- Considering the proposed increase in the number of residences, there is a need for a second traffic study for Elizabeth St and Elmwood Dr
- Has there been a study done to see if these roads can withstand the traffic of this construction?
- The St. Lawrence River is currently 2 ft above normal levels, does another flood plain study need to be done considering these high levels?
- What will happen with the watershed runoff? Surely it cannot all be shunted, untreated, straight into the river?
- Who will pay to clean and maintain the proposed sediment traps?
- What are the plans to preserve the creek running by the community gardens and down into the wetland?

- In the interest of being good neighbours, would the developers consider leaving as many of the large trees, tree lines and natural areas as possible? There is a lot of wildlife currently calling this area home.
- Have there been considerations of damages to surrounding homes due to the planned blasting?
- What noise regulations would be in place for the current residents - we are concerned about blasting, trucks, dust, start and end times etc.
- When will the peer review report be completed and published?

As you can see, the issues we have thus far are many, and these are just our opening thoughts. I urge you and the town to seriously consider a deferral in order to address the community's concerns and to take the time required to proceed with this development carefully and thoughtfully.

I will be away for the meeting on July 28th (had I had enough advanced warning I would have changed my plans in order to attend), but will be in attendance on August 12th.

Thank you for your time and consideration of our concerns.

Sincerely,
Lana Marion

From: [Penny Kelly](#)
To: [Brenda Guy](#)
Subject: Fw: Proposed new subdivision
Date: July 21, 2026 9:43:46 AM

Another one.

Thanks

Penny

Get [Outlook for iOS](#)

From: Lindymartin [REDACTED]
Sent: Tuesday, 21 July 2026 06:35:24
To: Penny Kelly <clerk@gananoque.ca>
Subject: Re: Proposed new subdivision

[REDACTED]

Lindy Martin:

- >
- > Good morning. I have a number of questions and concerns regarding the new subdivision off Elmwood Drive.
- >
- >
- > I've gone through a number of the planning documents for the subdivision and I have a few questions and concerns.
- >
- > Re storm water management: the planning data is based on the last 100 years for water levels, etc. From 2019 to 2026, the water levels have changed significantly to be above average. With the impact of climate change I question whether flooding will be an issue.
- >
- > Re traffic issues: I did not see any traffic data for Elmwood and Elizabeth Street. In your sanitary servicing document, it was reported that the population density in a house is four and town house is 2.38 persons. As these homes are all single car garage homes, parking on the street is going to be an issue, not only in the winter time for snow removal. The traffic flow on Elmwood will also be a concern. How will that be addressed?
- >
- > I am assuming that these issues will be addressed at the meeting on the 28th.
- >
- > Will the Cataraqui region conservation Authority report be available prior to the meeting? If it is not available, could we ask for a deferment until we receive it? The proposed area for the subdivision appears to ignore the fact that the area is by a bio diverse environment that should be left alone or at least plan for fewer congested, houses, and townhomes.
- >
- > I also feel that the town has not given all residents enough opportunity to study the subdivision plan and I would ask that the town council defer any decision to allow residents time to ask the appropriate questions.

>

> Thank you for your assistance in this matter and please add these concerns to the agenda for the upcoming council meeting.

>

> Linda Martin

>

>

>

From: [Penny Kelly](#)
To: [Brenda Guy](#)
Subject: Fw: Concerns regarding the Plan of Subdivision: Leeds Con.1 PT Lot 16 RP 28R-15673...
Date: July 21, 2026 9:43:04 AM

Over to you.

Thanks

Penny

Get [Outlook for iOS](#)

From: Bob Maccallum [REDACTED]
Sent: Tuesday, 21 July 2026 09:05:06
To: Penny Kelly <clerk@gananoque.ca>
Subject: Concerns regarding the Plan of Subdivision: Leeds Con.1 PT Lot 16 RP 28R-15673...

[REDACTED]
Dear Planning Advisory Committee,

Thank you for this opportunity to express a view of my many concerns regarding this proposed Plan of Division on the vacant lands south of Elmwood Drive and west of Arthur street.

This is arguably the largest proposed development in Gananoque history. Have you as the Planning Committee had time to study the ramifications of this project? You will be signing off with your okay on this. Have the proper regulatory bodies signed off on these changes?

My concerns are:

- The floodplain setback request from 30m to 15m.

We've witnessed major flooding in Ontario recently and in the past number of years. Climate change is happening. Look at the July 1 2026 flooding in Ottawa and the amount of damage to homes. Recall the damage of the record high water we've seen in the 1000 Islands in the last number of years. This property is essentially a floodplain. Storm water from King St south makes its way through this land to the St Lawrence River. With the roads and buildings the land cannot absorb the same amount of water.

This request should not be permitted.

- Lot frontage decrease from 15m to 11m.

Same arguments as above. This should not be permitted.

- Traffic to the subdivision

How are the trucks with excavating equipment etc going to get to the subdivision during construction? There is a very sharp turn on Elmwood Drive at the north end.

No sidewalks on Elmwood. Upon completion of subdivision and during construction traffic

flow will substantially increase.

Is John Street an option for traffic as well?

- Green space and water access for town residents.

Create green space, widen the lots. Don't create a future ghetto. Make it into a great place to live.

Will there be bike/walking trails and waterfront access for town people?

Other concerns:

- Noise from blasting. Damage to existing house foundations?
- Years of dust, noise and disruption
- Streets damaged due to heavy equipment traffic

Please consider the impact this development will have on our town now and in the future.

Thank you,

Robert MacCallum



From: [Penny Kelly](#)
To: [Brenda Guy](#)
Subject: FW: Proposed Plan of Subdivision - Vacant Lands of Elmwood Dr and West of Arthur St - LEEDS CON. 1 PT. LOT 16 RP 28R-15673 PARTS 1 TO 25 TOWN OF GANANOQUE
Date: July 21, 2026 10:29:43 AM

Over to you.

Penny

-----Original Message-----

From: [REDACTED]
Sent: July 21, 2026 10:28 AM
To: Penny Kelly <clerk@gananoque.ca>
Subject: Proposed Plan of Subdivision - Vacant Lands of Elmwood Dr and West of Arthur St - LEEDS CON. 1 PT. LOT 16 RP 28R-15673 PARTS 1 TO 25 TOWN OF GANANOQUE

[REDACTED]

To Whom This May Concern: Planning Development Committee;

Sir, Madam; I am so grateful to live in this beautiful town of Gananoque. I see new people moving in to my neighborhood which is a sign that we are growing. New houses have been built around my neighborhood to accommodate the need for affordable housing especially for our young families. Gananoque is one of the best places to live in Ontario. We are very fortunate to call Gan our home sweet home.

Recently, I received this notice of a proposed new housing development very very close to where I reside. The first thing that came to my mind was - "Wow, I will again be able to walk to the river!" I used to have access to the St. Lawrence River straight from my house before this property was bought by this new owner - "No trespassing" and a gate - blocked the walking path to the river.

Never would I have thought that the new owner would propose for a new subdivision. But with this proposed new subdivision development come growing concerns as well. I am here to express some of my concerns about this proposed subdivision in my area/neighbourhood.

1- Elmwood Drive neighbourhood is teeming with children and elders who are up and about with their scooters, bikes, etc. With the upcoming construction; traffic will be thick and busy with big machines, heavy equipment - coming and going in our street. Safety of our children and the elders will be at risk and questionable.

2- I know I won't be able to stop this phase of housing development but there will be lots of blasting, digging, zooming back and forth, dust, and many other disturbances. Will there be set time for peace and quiet in the WEEKENDS and NIGHT TIME so we can rest and be ready to face another noisy day of construction? We also have to go to work the next day.

3- Thankfully, Elmwood Dr. is up higher in location than the proposed subdivision. What happens to the water during torrential downpours?

Will those proposed houses be able to handle the outpouring of the heavy rainfall? I am also aware of the natural creek where I used to explore down that area. I am not a builder expert but I will be concerned with building on top of that - "A wise man built his house upon the sand. The rains came down, and the floods came up. And the house on the sand/flood plains went 'SPLAT!'" What will the dweller of that house do when that house sinks?

4- These houses will be here for generations. Please give space front and back for the dwellers to enjoy their home. Why do we cram them all for the sake of making more money? I know they have to be affordable but consider giving them a bonus of more space to plant a garden, put a clothes line up, for kids to play in the backyard.

I thank you in advance for carefully and wisely considering the concerns of the residents who are directly affected by this new housing development. My concerns are just simple and personal but I am confident that my voice will be heard. May God grant you wisdom, guidance and direction in this matter. Thank you again for all that you do for our beautiful town of Gananoque. God bless.

One of the concerned residents,
Mila MacCallum



From: [Bonnie & Darcy](#)
To: [Penny Kelly](#)
Cc: [Brenda Guy](#)
Subject: Deferral Request for Permit Approval - Elmwood Drive Subdivision
Date: July 21, 2026 7:38:03 AM

Good morning Penny,

I am writing to respectfully request that the planning committee defer approval of the proposed Elmwood Drive development permit until several key questions have been answered and the supporting information has been made available to the public.

This development has the potential to significantly impact our community, and I believe it is essential that residents and Council have a clear understanding of the project's environmental, transportation, and community planning implications before moving forward.

I would appreciate clarification on the following:

- The report states that the development will have "minimum impact on wetlands." Could Council explain how this conclusion was reached? What environmental studies were conducted, and what measures will be taken to protect these sensitive areas during and after construction?
- Has a traffic impact study been completed for the King Street and Elizabeth Street area? If so, how will the increased traffic generated by this development affect vehicle flow, pedestrian safety, and existing infrastructure?
- What evidence supports the need for this housing development? Has a housing market analysis or needs assessment been completed to demonstrate that there is sufficient demand?
- Who is the intended demographic for this development? Understanding whether the project is designed for young families, seniors, workforce housing, or another group is important in evaluating how it aligns with our community's current and future needs.
- Will the developer consider preserving portions of the existing tree line instead of clear-cutting the property? Retaining mature trees wherever possible would help maintain wildlife habitat, reduce erosion, provide natural screening, and preserve the character of the area.

These are important questions that deserve thoughtful consideration before any final decision is made. Deferring approval would allow Council the opportunity to review this information, provide greater transparency to residents, and ensure that decisions are based on complete and accurate information.

Thank you for considering this request.

Bonnie & Darcy Ruddock



July 18, 2026

Ref: Elmwood Subdivision, Development Permit and Plan of Subdivision Approval

Att: Mayor, Councillors, Planning Advisory Committee

I'm writing to ask that you **Defer** the request for approval.

It is with a heavy heart that I say, "In general, I support the developers plan of subdivision".

Albeit there are still several unanswered questions that I believe The Town and their residents are entitled to receive in order for a transparent process to take place.

That being the following;

1. Is the Town going to be the "owners" of the oil grit separators, swale system, silt fencing, and all the land that will be deemed as "open space" for storm water run-off? If so, what is the yearly maintenance cost and has the future capital replacement cost been analyzed?
2. Will the developer be required to install fencing to prevent property usage creep into the "open space" areas?
3. Will there be blasting?
4. Specific to the design. Will the interior townhouse units have access to their backyards through Block 78 for maintenance to their property/building?
5. Has the subdivision plan been presented to Trees & Trails Committee for input?
6. Will an engineering report be completed by the Town to assess potential ground water effects to the surrounding existing neighbourhoods? FYI – sinkholes are occurring in the Elmwood/Elizabeth/Churchill area.
7. Was a traffic study done for the intersection of King and Elizabeth?
8. What is the construction plan as far as first point of access for equipment?

Note: Pine, Elmwood, and Churchill currently do not have sidewalks.

To the Developer and the sub-contractors, you hire - Please be a **Good Neighbour!**

You will be disrupting several well-established neighbourhoods. Neighbourhoods with children that play outside with minimal traffic and seniors that are home all day cherishing the serenity of our current environment.

To the Mayor, Councillors and members of Planning Advisory

Our Vision is to preserve and enhance the Town's unique "small town" heritage, preserve our historic and environmental character, and provide a high quality of life through a sustainable development pattern.

Thank you for reading.

Sincerely, Marion Sprenger

[Redacted Signature]

From: [Penny Kelly](#)
To: [Brenda Guy](#)
Subject: FW: Concerns about Proposed Subdivision Development Concerned Residents Group
Date: July 21, 2026 10:34:05 AM

[Here you go.](#)

PK

From: Todd Webber [REDACTED]
Sent: July 20, 2026 7:34 PM
To: Penny Kelly <clerk@gananoque.ca>; Todd Webber [REDACTED]
Subject: Concerns about Proposed Subdivision Development Concerned Residents Group

[REDACTED]

Dear Members of the Town Council,

I am writing to express my concerns regarding the proposed subdivision development on the vacant lands south of Elmwood Drive and/west of Arthur Street (LEEDS CON. 1 PT. LOT 16 RP 28R-15673 PARTS 1 TO 25 TOWN OF GANANOQUE)

I understand the need for growth and new housing. I am concerned about the overall scale of the project and the number of homes being proposed. A development of this size could significantly impact the character of our community and place additional pressure on local infrastructure and services.

The types and styles of homes being built are another concern. I encourage the Council to ensure that new housing is consistent with the existing character of the neighbourhood and provides a diverse range of housing options that complement the surrounding area.

In addition, I would ask the Council to carefully consider how the development may affect the historical character of the area. Preserving local heritage and maintaining the unique identity of our community should remain a priority as growth occurs.

I am also concerned about the potential effects on local wildlife and natural habitats. The area supports a variety of species, and increased development may result in habitat loss and disruption of important environmental corridors.

Finally, I am concerned about the impact on local traffic. Additional homes will increase vehicle volumes on nearby roads, potentially affecting safety, congestion, and the quality of life for existing residents.

I respectfully request that Council carefully review these concerns and ensure that comprehensive studies and mitigation measures are in place before proceeding with the development.

Thank you for your time and consideration.

Sincerely,

Mr. Todd Webber



From: [Paul Finn](#)
To: [Brenda Guy](#)
Subject: Proposed Plan of Subdivision - Vacant Lands of Elmwood Dr and West of Arthur St
Date: July 22, 2026 4:19:29 PM

To: Brenda Guy
Manager of Planning and Development
Town of Gananoque

Dear Ms. Guy:

I am writing with respect to the proposed subdivision. My comments follow:

First of all, with respect to the requested relief, I wish to object to the proposal to reduce the lot frontage for single family dwellings from 15 metres to 11 metres. The frontage requirement exists to prevent the sort of overcrowding of houses which the developer now proposes. The Town of Gananoque has already decided on an appropriate frontage for new lots and should not accede to this request.

I would also object to the reduction of the floodplain setback from 30 metres to 15 metres. These setbacks exist for a reason and municipalities deviate from them at their peril. One possible outcome is that houses get built without provision for sufficient drainage. If the properties subsequently get flooded, the municipality may be sued for agreeing to changes that could reasonably have been foreseen to result in drainage/flooding problems. By then, the developers are likely to be long gone and town's residents will bear the liability. Have the developers actually provided the town with any drainage study to justify reducing the setback? Or is this simply an effort to increase the amount of land that can be sold?

A third area of concern, not raised in the proposal is traffic. By this I mean not merely construction traffic but long-term traffic. The new roads are two big cul-de-sacs which seem to empty out onto Elmwood Dr. Since Elmwood Dr. doesn't lead to King St., the logical access is up Churchill Drive (misabeled as one of the Regent Streets on the map) to Elizabeth Dr. and from there to King St. As a rough estimate, we may be looking at another 200 cars a day.

Note that both Elmwood and Churchill are currently roadways shared by both cars and pedestrians — always a bad combination. Moreover, Churchill is relatively narrow, at least in its current configuration. In short, the town needs to think through the traffic implications of this proposal.

In conclusion, the new subdivision needs a better road access plan than is currently provided for. Logically, I would suggest that this means basing it on through roads rather than cul-de-

sacs.

respectfully submitted,

Paul Finn

[REDACTED]

[REDACTED]

July 21, 2026

Brenda Guy
Manager of Planning and Development
Town of Gananoque

Re: File No. SD2025-01 Proposed Plan of Subdivision and Class III Development
Permit – Vacant lands south of Elmwood Drive and west of Arthur Street

Dear Ms. Guy:

As a resident bordering woodlands on the property of the proposed development, I have sighted deer – on one occasion, a grouping of four deer; foxes, including fox cubs; birds including Osprey, Pileated woodpecker, and a Grey owl; and have observed monarch butterflies in the adjacent clearing.

The potential extensive removal of vegetation to make way for this proposed development threatens the destruction of this wildlife's habitat.

The danger construction activity will pose to the wildlife that inhabits this property greatly concerns me and I want to be assured that measures will be taken to avoid harm to these species during any potential construction.

A section of the development as currently proposed would displace a man-made elevated nest platform that Osprey have been returning to and occupying for several consecutive years.



What measures will be taken to protect the osprey during construction?

The application document entitled Enhanced Wetland Concept contains a caption on a map that states: "*Possible* osprey nest location".

Can Town staff confirm that the applicant will be required to ensure the osprey nest platform will be relocated by persons experienced in doing so, or if relocating the existing nest platform is demonstrated to not be feasible, that a new elevated osprey nest platform will be constructed in an appropriate location to provide the best chance that osprey will return to nest at this location?

Sincerely,

Sue Thomas



From: [Penny Kelly](#)
To: [Brenda Guy](#)
Subject: FW: File No SD2025-01 - THOMAS - 2nd Message
Date: July 23, 2026 9:45:09 AM

From: Sue Thomas [REDACTED]
Sent: July 22, 2026 8:55 PM
To: Penny Kelly <clerk@gananoque.ca>
Subject: File No SD2025-01

[REDACTED]
July 22, 2026

To; Chair and Members of the Gananoque Planning Advisory Committee

Re: File No. SD2025-01 Proposed Plan of Subdivision and Class III Development Permit – Vacant lands south of Elmwood Drive and west of Arthur Street

As a resident bordering woodlands on the property of the proposed development, I have sighted deer – on one occasion, a grouping of four deer; foxes, including fox cubs; birds including Osprey, Pileated woodpecker, and a Grey owl; and have observed monarch butterflies in the adjacent clearing.

The potential extensive removal of vegetation to make way for this proposed development threatens the destruction of this wildlife's habitat.

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Sincerely,

Sue Thomas

[REDACTED]

[REDACTED]

[REDACTED]

July 21, 2026

Brenda Guy
Manager of Planning and Development
Town of Gananoque

Re: File No. SD2025-01 Proposed Plan of Subdivision and Class III Development
Permit – Vacant lands south of Elmwood Drive and west of Arthur Street

Dear Ms. Guy:

The development proposal for the vacant lands south of Elmwood Drive and west of Arthur Street represents the largest combination of land area and dwelling units in Gananoque's recent history: 11.59 hectares (28.6 acres) of which 7.66 hectares (18.8 acres) would be built upon; construction of 103+ dwelling units and roadways.

Preservation of Vegetation

The Town of Gananoque's Draft Official Plan states the following:

"3.2.2.9 Street Trees

Street trees and canopies provide many benefits. They provide natural habitat opportunities, reduce heating and cooling costs and noise levels, increase property values and provide numerous other social and aesthetic benefits. It is the intent of Council to protect and preserve existing street trees and in particular those trees that have been identified as heritage trees. Council may enact more restrictive regulations under the Municipal Act, S.O 2001, to protect the Town's urban trees and will ensure that proposed development is reviewed to provide for the preservation and protection, wherever possible, of existing treed areas."

The Town of Gananoque's Tree Canopy and Natural Vegetation Policy, approved in 2022, states as follows:

"8.0 PLANNING AND DEVELOPMENT

8.1 When development is considered, the Municipality will apply creative planning approaches designed to protect and enhance its tree canopy and natural vegetation; ensuring the Municipality's amenity value and identity is enhanced as the canopy and vegetation matures. Landscape plans are to be submitted as part of development proposals, which should maintain and/or enhance the current tree canopy rather than reduce it. The Town of Gananoque's Planning & Development Department alongside the Public Works Department, will make every effort to ensure development proposals coincide with this policy regarding tree canopy and natural vegetation."

How does the applicant's proposal comply with the Council approved Tree Canopy and Natural Vegetation Policy?

If the proposed development is given permission to proceed, the applicant should be required to permanently retain vegetative buffers, including but not limited to all vegetation within the easement corridors along northern property line, and all vegetation along the north property line abutting the Arthur Street unopened road allowance which serves as a section of the Gananoque Trail.

Traffic

Elmwood Drive, Churchill Drive, and the west half of MacDonald Drive do not have sidewalks. Pedestrians and cyclists, including students attending Gananoque Intermediate and Secondary School, residents walking and jogging for exercise, persons walking dogs, pedestrian shopping trips to 2 grocery stores and 3 pharmacies, and tourists walking and cycling the road sections of the Gananoque Trail occupy the roadway on Elmwood Drive, on Churchill Drive between Elmwood Drive and Elizabeth Drive and on the western segment of MacDonald Drive.

The 90-degree bend at the north end of Elmwood Drive where it intersects with Pine Street has significantly reduced sightlines, posing a danger to oncoming traffic, in particular to pedestrians and cyclists using the roadway in the absence of sidewalk infrastructure.

The volume of construction traffic, including trucks transporting fill to the site, potentially for months, will pose a significant danger to these road users.

How will the safety of pedestrians, cyclists and local vehicular traffic be protected from the anticipated volumes of construction and contractor vehicles entering and exiting the construction site?

The applicant submitted a revised Transportation Impact Study that considers both the increase in vehicle volumes due to the increase in proposed dwelling units, as well as the impact of the proposed new connection between the east segment of Arthur Street and the proposed subdivision.

There are eventual plans to connect Jean Drive (formerly Conner Drive) to Carmichael Drive which will create a third access route to the subdivision with implications for traffic volumes on Jean Drive between the intersection of MacDonald Avenue and the signalized intersection at Carmichael Drive and King Street.

What is the assessed impact of this future change in vehicle trip patterns and the implications for the King Street / Carmichael intersection?

Construction Noise

The Town of Gananoque's Noise By-Law is more permissive than its two largest neighbours – Kingston and Brockville – and the Township of Leeds and the Thousand Islands.

In Gananoque, noise from construction is permitted from 7 am to **9 pm every day of the week including Sundays and holidays**.

Kingston's By-Law 2004-52 permits construction noise Mondays to Saturdays between 7 am and 7 pm and prohibits it on Sundays and statutory holidays.

Brockville's By-Law 076-2021 permits construction noise Mondays to Fridays between 7 am and 7 pm, and on Saturdays between 9 am and 7 pm. Construction noise is prohibited on Sundays and statutory holidays. The regulations prohibit the emission of sound from the use of construction equipment in excess of 85 dBA when measured at the point of reception.

The Township of Leeds and the Thousand Islands' By-Law 22-049 permits noise from construction between 7 am and 8 pm and prohibits it on Sundays and holidays.

Should residents of Gananoque be exposed to construction noise from this proposed development as late as 9 pm every night, and all day on Sundays and holidays?

Process

The applicant's submission totals 713 pages. Members of the Planning Advisory Committee may have just recently received this documentation and Town Staff's report.

Is it fair to expect Committee members to be able to review and absorb this quantity of information within this time frame so as to be in a position to make an informed decision and recommendation to Council on such a consequential matter?

Public notification of the development proposal was limited to a sign posted on February 19th at the south end of Elmwood Street and at the east end of Arthur Street stating that a public meeting date was to be determined, and by way of a Public Notice on the Town's website dated February 6, 2026. No copy of that Public Notice was mailed to residents bordering the proposed development.

A Notice of Public Meeting advising that the Proposed Plan of Subdivision and Class III Development Permit was scheduled to be considered at the July 28th Planning Advisory Committee meeting was posted to the original signposts and was mailed to residents within the immediate vicinity of the property. But other residents living just a block away

on streets that could likely also experience construction traffic and who will hear the noise from the construction, did not receive the mailing.

Should notice of a proposed development of this scale not be more widely publicized so all residents of the impacted neighbourhoods, and indeed all Town residents, are made aware before any final decisions are made?

Sincerely,

Greg McLean



From: [Kate McLean](#)
To: [Brenda Guy](#); [Emma Stucke](#); [Heinz Stucke](#)
Subject: Vacant Lands south of Elmwood Drive and/west of Arthur Street
Date: July 23, 2026 1:32:47 PM

Hi Brenda,

Thank you for circulating the proposed plan of subdivision. Emma helped me with the following questions and comments and we would like to submit them in advance of the public meeting.

Shoreline and Waterbody Protection

We are requesting more information regarding the long-term protection of the St. Lawrence River shoreline and associated watercourse. Will a minimum naturalized shoreline buffer or “ribbon of life” be required and maintained along the waterfront? The Environmental Impact Study (EIS) recommends enhancing the shoreline through natural landscaping and native plantings to create a vegetative buffer that protects water quality, wildlife habitat, and other sensitive environmental features. How will this recommendation be implemented and maintained over the long term?

The EIS also recommends a Homeowner’s Stewardship Manual. Will the Town require a Homeowner Stewardship Manual? If yes, how will its recommendations be implemented, monitored, and enforced, particularly with respect to shoreline plantings, and naturalized landscaping?

Docks & Boathouses

We are concerned about the potential environmental and visual impacts of permitting up to 13 boathouses along the shoreline, as well as their cumulative effect on the waterfront landscape and natural shoreline functions. We respectfully request that the Town consider limiting marine facilities within this subdivision to docks and boat ports only, and prohibit boathouses to reduce shoreline alteration, protect the shoreline, and maintain the natural character of the waterfront.

Parks & Pathways

The planning report references a pathway that will traverse the central wetland and watercourse blocks. Is there a plan that shows the proposed path network? We are interested in seeing how these proposed paths will connect to existing trails.

We would also appreciate more details on the plans for Park Block 74. Will existing native trees and vegetation be retained and protected, what park amenities are proposed, and how will the park be integrated with the existing trail/open space network?

Thank you in advance for your your time.

I do apologize that I haven't given you much time before the meeting but hope it is sufficient enough that you are able to respond. If you need more information from us, please let me know.

Sincerely,

Kate McLean

Brenda Guy

From: Penny Kelly
Sent: July 23, 2026 9:42 AM
To: Brenda Guy
Subject: FW: Proposed Plan of Subdivision Elmwood Drive, Town of Gananoque - PAJUNEN

From: Sharon Pajunen [REDACTED]
Sent: July 21, 2026 12:35 PM
To: Penny Kelly <clerk@gananoque.ca>
Cc: Mark Williams [REDACTED]
Subject: Proposed Plan of Subdivision Elmwood Drive, Town of Gananoque

[REDACTED]

Dear Ms. Kelly,

In reference to the upcoming Planning Advisory Committee meeting on July 28 at 6pm, we would like to forward some of our concerns as Arthur Street homeowners/tax payers.

In light of the fast moving implementation and approvals processes of this Subdivision Development, we are requesting a deferral of the decision to approve this plan.
Some of the reasons for the deferral request include the following:

- No traffic study has been completed for the entrance from King Street at Elizabeth Drive
- Late additions to the original development plan (i.e. Arthur Street extension) warrant further study
- Damage to local roads and sidewalks by heavy trucks and machinery: cost to the town or developer?
- Has a study been done regarding potential damage to existing homes due to blasting or use of explosives on rock formations at the site?
- Removal of trees and the adverse effects on local wildlife and bird habitats (deer, fox, rabbits, turtles, osprey, etc.)
- No timeline has been given for the entire project's start to finish
- Awaiting comprehensive review of upcoming report by the Cataraqui Region Conservation Authority regarding watershed and flooding issues
- Identifying contact person(s) at the Town of Gananoque, who will respond to all residents' concerns and complaints

We look forward to the Planning Advisory Committee meeting next week and trust that these issues and concerns will be addressed appropriately.

Thank you,

Mark Williams and Sharon Pajunen
[REDACTED]

NOTICE OF PUBLIC MEETING

Proposed Plan of Subdivision and Class III Development Permit

TAKE NOTICE THAT the Town is in receipt of a complete application for a proposed Plan of Subdivision, pursuant to Section 51 and a Development Permit pursuant to Section 70.2 of the Planning Act, R.S.O. 1990.

Planning Advisory Committee for the Town of Gananoque will hold a Meeting on **TUESDAY, JULY 28, 2026 at 6:00 P.M.** in the **TOWN OF GANANOQUE COUNCIL CHAMBERS, 30 King Street East, Gananoque** to provide recommendations to Council on the concurrent applications below.

AND FURTHER TAKE NOTICE that the Council for the Corporation of the Town of Gananoque will hold a Public Meeting on **WEDNESDAY, AUGUST 12, 2026 at 5:00 P.M.** at the **TOWN OF GANANOQUE COUNCIL CHAMBERS, 30 King Street East, Gananoque** to consider the following applications:

*The **TOLL-FREE PHONE NUMBER** and **ACCESS CODE** will be found on the meeting agenda, posted to the Town website at <https://www.gananoque.ca/town-hall/meetings> prior to the meeting.

The property municipally and legally described as
Vacant lands south of Elmwood Drive and/west of Arthur Street
LEEDS CON. 1 PT. LOT 16 RP 28R-15673 PARTS 1 TO 25 TOWN OF GANANOQUE

File No. SD2025-01

APPLICANT: MHBC PLANNING LTD.
OWNER: 1000989284 ONTARIO INC.

has applied to the Town of Gananoque for a Plan of Subdivision to
DEVELOP THE SUBJECT VACANT LANDS FOR A PLAN OF SUBDIVISION, TO BE PHASED WITH SIXTY-SIX (66) SINGLE FAMILY DWELLINGS AND THIRTY-SEVEN (37) TOWNHOUSE UNITS

AND

File No. DP2026-04

APPLICANT: MHBC PLANNING LTD.
OWNER: 1000989284 ONTARIO INC.

has applied to the Town of Gananoque for a Development Permit to
SEEK RELIEF FOR A REDUCTION OF THE LOT FRONTAGE FOR SINGLE DETACHED DWELLINGS FROM 15M TO 11M AND REDUCE THE FLOODPLAIN SETBACK FROM 30M TO 15M

Note: Applications SD2025-01 and DP2026-04 are concurrent. DP2025-01 will be a condition for final approval of Plan of Subdivision application SD2025-01

Additional information in relation to the proposed **Plan of Subdivision** and **Development Permit** is available in-person for inspection between 8:30am - 4:30pm at the Town of Gananoque, 30 King Street East, Gananoque Ontario or on the Town website at <https://www.gananoque.ca/town-hall/meetings>, or by emailing assistantplanner@gananoque.ca or by calling Trudy Gravel 613-382-2149 ext. 1129.

If a person or public body does not make oral submissions at a public meeting or make written submissions to the Town of Gananoque in respect of the proposed **Plan of Subdivision** before the approval authority gives or refuses to give approval to the draft plan of subdivision, the person or public body is not entitled to appeal the decision of the Town of Gananoque to the Local Planning Appeal Tribunal and may not be added as a party to the hearing of an appeal before the Local Planning Appeal Tribunal unless, in the opinion of the Tribunal, there are reasonable grounds to do so.

If you wish to be notified of the decision of the Corporation of the Town of Gananoque in respect to this proposed **Plan of Subdivision** and related amendments, you must make a written request to the Clerk for the Town of Gananoque, 30 King Street East, Gananoque, Ontario K7G 1E9, or by email to clerk@gananoque.ca.

If you wish to provide comment or input in respect of the proposed **Development Permit** you may do so at the public meeting or in writing prior to the meeting. **Note:** Only the applicant of a **Development Permit** has a right to appeal a decision or non-decision on an application to the Ontario Land Tribunal where the application meets the requirements established through the official plan and development permit by-law.

DATED this 2ND day of JULY 2026



Brenda Guy
Manager of Planning and Development
bguy@gananoque.ca
613-382-2149 Ext.1126

DRAFT PLAN OF SUBDIVISION

LEGAL DESCRIPTION

LOT 15 OF CONCESSION 1,
REGENT TOWNSHIP OF LEEDS
TOWN OF CANADIQUE
COUNTY OF LEEDS

OWNERS CERTIFICATE

I HEREBY AUTHORIZE MCGAUGHTON HENSEN BRITTON CLARSON PLANNING LIMITED
TO SUBMIT THIS PLAN FOR APPROVAL.

Date: _____

RUB PIERCE
1000989284 ONTARIO INC.

SURVEYOR'S CERTIFICATE

I HEREBY CERTIFY THAT THE BOUNDARIES OF THE LAND TO BE SUBDIVIDED ON THIS
PLAN AND THEIR RELATIONSHIP TO THE ADJACENT LANDS ARE ACCURATELY AND
CORRECTLY SHOWN.

Date: _____

SHAWN LEROUX O.L.S., O.L.T.P., A.L.S.
J.D. BARNES LIMITED

KEY PLAN



Scale: 1:5,000

ADDITIONAL INFORMATION

Required Under Section 51 (17) of the Planning Act, R.S.O., 1990, c.P.13 as Amended

(A) As Shown
(B) As Shown
(C) As Shown
(D) As Shown
(E) As Shown
(F) As Shown
(G) As Shown
(H) As Shown
(I) As Shown
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(V) As Shown
(W) As Shown
(X) As Shown
(Y) As Shown
(Z) As Shown

AREA SCHEDULE

DESCRIPTION	LOTS/BLOCKS	UNITS	AREA
Low Density Residential - Single	1-66	66	4,997 ha
Low Density Residential - Townships	67-70	23	0.614 ha
Multiple Residential	71	12-11	0.480 ha
Public Residential	72	72	0.552 ha
Public Residential	73	73	0.552 ha
Open Space	74-77	25-27	2,188 ha
Servicing	78-79	28-29	0.243 ha
Servicing/Tail Connection	80	80	0.039 ha
Future Development	81-82	81-82	0.012 ha
Roads			1,986 ha
Total	82	101-103	11,986 ha

NOTES

1. All dimensions are in metres unless otherwise shown.

2. Environmental features provided by VSP, 2023-05-23, & FFE, August 2023

3. Boundary information has been compared from Plan 288-15073 and Confirmed by Field

4. Contains information Referred under the Open Government Licence - Ontario.

Revision No. _____ Date _____ Issued / Revision _____ By _____

Stamp _____ Date _____ May 28, 2026

File No. _____ 913786

Plan Scale _____ 1:1000 (Arch D)

Drawn By _____ JB

Checked By _____ EE

Project

VI - Elmwood Drive, Ganarique
R.W. Tomlinson Limited
100 CHIGATE Drive, Ottawa ON

Draw No. _____

DRAFT PLAN OF SUBDIVISION

Scale Bar _____ 0 10 25 50 100m

1 of 1

PLANNING
URBAN DESIGN
& LANDSCAPE
MHBC
ARCHITECTURE

**APPLICATION FOR PLAN OF SUBDIVISION/CONDOMINIUM****A Complete Application consists of:**

- ☐ One original and one copy of a complete application form signed including declaration of applicant.
- ☐ One copy of the deed of property
- ☐ Application fee in the amount of \$3,000 plus \$30 per lot/unit payable to the Town of Gananoque – Subdivision
Application fee in the amount of \$2,000 payable to the Town of Gananoque – Condominium
- ☐ Deposit fee in the amount of \$2,000 payable to the Town for any peer reviews of various studies (By-law 2016-047). The owner/applicant is responsible for all peer review fees that the Town incurs in this regard and may be subject to additional invoicing.
- ☐ One scaled copy, one reduced 11 x 17 copy and one digital of the most recent survey of the subject property
- ☐ Two scaled copies, two reduced 11 x 17 copies and one digital copy of the draft plan including:
 - o Boundaries of the land proposed to be subdivided, certified by an Ontario Land Surveyor;
 - o Locations, widths and names of proposed roads within the proposed subdivision and of existing highways on which the proposed subdivision abuts;
 - o Approximate dimensions and layout of the proposed lots;
 - o Natural and artificial features such as buildings or other structures or installations, railways, highways, watercourses, drainage ditches, wetlands and wooded areas within or adjacent to the land proposed to be subdivided;
- ☐ Environmental Documentation to accompany the application include:
 - o Evidence respecting the availability and suitability of water and waste water services including where appropriate the preparation of a hydrogeological study, terrain analysis and an impact assessment report in accordance with the Ministry of Environment guidelines and regulations;
 - o Preparation of a servicing options statement;
 - o Preparation of a stormwater drainage plan;
 - o Preparation of a grading plan
 - o Preparation of a sediment and erosion control plan
 - o Studies required under the environmental and development constraints policies as identified in the Official Plan.
- ☐ Planning and Design Considerations include the following:
 - o Consistency with the Lowertown Master Plan where applicable
 - o Lot and block configuration
 - o Compatibility with adjacent uses
 - o Road access, street layout and pedestrian amenities
 - o Parks and open space amenities
 - o Easement and right-of-way requirements
 - o Justification of the need for the Subdivision
 - o Emergency and secondary accesses
- ☐ In considering a draft plan of subdivision, regard shall be had to, among other matters, the criteria of Section 51 (24) of the *Planning Act, R.S.O. 1990*, the Official Plan and the Development Permit.

Applications may be subject to any Town incurred costs over and above the fees set out in the General Fees and Rates By-law for various services provided by the municipality

Subdivision Application may be subject to review and a separate cheque payable to the Cataraqui Region Conservation Authority.

The Town of Gananoque recommends that you consult with a Conservation Authority Officer prior to making application.

Name of Applicant:	Name of Property Owner (if different than applicant):
Emily Elliott, MHBC Planning Ltd	1000989284 ONTARIO INC.
Address:	Address:
#200-540 Bingemans Centre Drive, Kitchener ON N2B3X9	100 CitiGate Drive, Ottawa
Telephone: 519-576-3650	Telephone: 613-690-3389
E-mail: eelliott@mhbcplan.com	E-mail: rpierce@tomlinsongroup.com

Name of Agent, Solicitor or Planning Consultant:	Name of Ontario Land Surveyor:
Emily Elliot- MHBC Planning Ltd	Shawn Leroux, JD Barnes Limited
Address:	Address:
#200-540 Bingemans Centre Drive, Kitchener ON N2B 3X9	62 Steacie Drive, Suite 103, Ottawa
Telephone: 519-576-3650	Telephone: (613) 731-7244 Ext 117
Email: eelliott@mhbcplan.com	Email: sleroux@jdbarnes.com

Street or Property Address (if applicable): 205 Elmwood Drive			
Legal Description: LEEDS CON 1 PT LOT 16 RP 28R12422 PARTS 3 TO 16 21 TO 31 AND 33 TO 35 PT PART 1 RP 28R13585 PART 10			
Frontage: Irregular	Depth: Irregular	Area (sq.m): 115,860	Area (acres): 28.63

☒ Plan of Subdivision ☐ Revision of Draft Plan Approval ☐ Revision to Conditions of Draft Approval ☐ Extension of Draft Plan Approval ☐ Registration of Phase of Draft Plan Approval ☐ Other _____	☐ Plan of Condominium ☐ Standard Condominium ☐ Vacant Land ☐ Common Element ☐ Phased ☐ Exemption to Draft Plan ☐ Other _____
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PROPOSED AND CURRENT LAND USE:		
Current designation in the Official Plan Residential		
Current designation in the Development Permit (Zoning) Residential & Waterfront Overlay		
Current use of the property Vacant		
How long has the existing use of the subject lands continued?		
Is the property designated as a Heritage Site?	☐ Yes	☒ No
Has the grading of the land been changed by adding earth or other material?	☐ Yes	☒ No
Has there been industrial or a commercial use on the subject lands or adjacent land?	☐ Yes	☒ No
Has a gas station, petroleum or other fuel stored on the subject land or adjacent land at any time?	☐ Yes	☒ No
ANY COMMERCIAL OR INDUSTRIAL USES ON THE SUBJECT OR ADJACENT LANDS (specify the uses):		
ANY CONTAMINATION by former uses on the site or adjacent (that you are aware of):		

ABUTTING LAND USE(S):	
East	Vacant land- undeveloped natural heritage features
West	Low rise residential
North	Low rise residential
South	St. Lawrence River

ADDITIONAL INFORMATION FOR CONDOMINIUM APPLICATIONS ONLY:					
Type of Condominium:					
☐ Standard	☐ Phased	☐ Leasehold	☐ Common Elements	☐ Vacant land	☐ Conversion
If the proposed condominium is a conversion of a building containing residential units, what is the number of units to be converted?					# _____

Has a Development Permit (Site Plan) been approved? No. Submitted concurrently with this application.		
Has an Agreement been executed and registered on title?	☐ Yes	☒ No
Has a Building Permit been issued?	☐ Yes	☒ No
Is the Building under Construction?	☐ Yes	☒ No
Is the Building completed?	☐ Yes	☒ No
If Yes, the date of completion	☐ Yes	☐ No
Is this a conversion from residential rental units? No		
If Yes, the number of units to be converted	☐ Yes	☐ No

Please refer to Draft Plan and Planning Justification Report

Proposed Plan Details:	No. of units or dwellings	No. of Lots/Blocks	Area (ha)	Density units/per ha	No. of Park. Spaces
Residential – single detached	66	66	4.59	14.3	
Residential – semi-detached/duplex					
Residential – row	37	5	1.05	35.2	
Residential – triplex					
Residential – apartment					
Commercial					
Industrial					
Park, Open Space	n/a	5	2.18	n/a	n/a
Roads	n/a		1.98	n/a	n/a
Are there any easements or restrictive covenants affecting the subject lands? ☒ Yes ☐ No If yes, describe (List and identify purpose):					

Access: ☒ Municipal Street ☐ Unopen Road Allow ☐ Existing ROW ☐ Other

Name of Street/Road:
Elmwood Drive

Entrance Approvals and Permit Number(s):
NA

Water Access (where access to the subject land is by water only)

Docking Facilities (specify)	Parking Facilities (specify)
distance from subject land _____	distance from subject land _____
distance from nearest public road _____	distance from nearest public road _____

Services: ☒ Municipal Water and Sewer ☐ Municipal Water & Private Sewage ☐ Private Well and Municipal Sewage ☐ Private Well and Private Sewage

Water and Sewer Hook-up Approvals and Permit Number(s), if applicable:

Other Concurrent Applications (provide application number, if applicable): concurrent submission

☐ Official Plan Amendment ☐ Consent ☒ Development Permit ☐ Subdivision Approval ☐ Building Permit Approval

Other Information: Any other information that may be useful in reviewing this application? If so, explain below
Please see cover letter.

BELOW IS A SUMMARY OF REPORTS AND/OR PLANS THAT MAY BE REQUIRED BUT ARE NOT LIMITED TO THE FOLLOWING:

Planning Rationale	Reviewing Planning Act, Provincial Plans and Official Plan (and Development Permit if applying for a Development Permit application concurrently)
Environmental Impact Assessment	Where application provides for development in or adjacent to an environmentally sensitive area
Traffic Study	Where application provides for development which may result in increased traffic or the need to alter roads or intersections
Air, Noise or vibration study	When required by a provincial guideline
Heritage Study	Development in Lowertown or adjacent to existing heritage properties
Hydrogeology	Development on private services
Erosion Control	Development along shorelines or hazard areas.
Archeological Study	Development proposed on lands located within 300 metres of a shoreline
Tree Preservation Plan	Where development could result in the loss of street trees or wooded areas.

Geo Technical Report	
Stormwater Management Report	
Site Servicing Study	
Draft Plan of Subdivision	
Grading and Drainage Plan	
Street Plan and Profile	
Storm Drainage	
Site Servicing Plan	
Landscaping	
Utility Plan	
Other	

AUTHORIZATION BY OWNER

I/We, the undersigned being the owner(s) of the subject land of this application for a consent, hereby authorize

MHBC Planning Ltd (print) to be the applicant in the submission of this application.

Furthermore, I/we, being the registered owner(s) of the subject lands, hereby authorize the Members of Council, Planning Advisory Committee and the Town of Gananoque staff members, to enter upon the property for the purpose of conducting a site inspection with respect to the attached application.

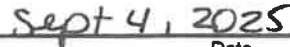


Signature of Owner

Signature of Owner



Signature of Witness (not applicant)



Date

DECLARATION OF APPLICANT

I, Emily Elliott of the City of Kitchener in the Region of Waterloo solemnly declare that:

I understand that the applicant/owner will be required to provide 100% security as per the estimated cost of works by an engineer and approved by the Town in the form of a Letter of Credit or Certified Cheque until such time as the works are completed. A 15% holdback will be maintained for a period of one year after the works are completed. This will be applicable at the time of agreement. Furthermore, I, being the applicant of the subject lands, hereby authorize the Members of Council, Planning Advisory Committee and the Town of Gananoque staff members, to enter upon the property for the purpose of conducting a site inspection with respect to the attached application.

All of the above statements contained in the application are true and I make this solemn declaration conscientiously believing it to be true and knowing that it is of the same force and effect as if made under Oath and by virtue of The Canada Evidence Act.

Declared before me at the City of Kitchener in the Region of Waterloo this 15th day of September, 2025

David William Aston, a Commissioner, etc.,
Province of Ontario for MacNaughton Hermes
Britton Station Planning Ltd, etc
Expires January 9, 2026.



Signature of Applicant

Office Use Only		Roll No: <u>081400002029322</u>
Official Plan Designation: <u>Residential</u>	Development Permit Designation: <u>Residential</u>	Other: _____
Access (Entrance Permits etc): _____	Water and Sewer Hookup (Permits etc): _____	Other: _____
Date of Submission: <u>September 15, 2025</u>	Application Complete: <u>BG</u> Manager of Planning and Development	<u>January 5, 2026</u> Date

Questions??

Brenda Guy, Manager of Planning and Development
Town of Gananoque
30 King Street East Gananoque, ON K7G 1E9
Telephone: (613) 382-2149 ext.1126 E-mail: bguy@gananoque.ca

Peer Review/Consultant Services

In order to streamline the Town of Gananoque's planning process, peer review services may be contracted out by the Town under By-law 2004-63 and amending By-law 2007-29. These may include but are not limited to the following:

Official Plan Amendment	Sanitary System Design
Condominium Applications	Site Plan Applications
Consent Applications	Subdivision Applications
Environmental Assessment	Storm Water Management
Minor Variance Applications	Traffic Studies
Noise Studies	Water Distribution System
Ontario Municipal Board Representation	Zoning By-law Amendment
Part Lot Control	Other Miscellaneous

The use of and choice of peer review contract consultants for either planning or engineering on any specific project are subject to the approval of either the Chief Administrative Officer/Manager of Planning and Development or the Manager of Public Works within their respective areas of jurisdiction.

All costs for the peer review consultants shall be fully paid by the applicant/developer.

Upon approval of the use of a peer review consultant, the applicant/developer shall execute the agreement below with the Town and post a security deposit of \$2,000 (two thousand dollars).

All submissions, correspondence etc. shall be directed to the Manager of Planning and Development, who shall be responsible for distribution.

All invoices from the peer review consultant shall be paid by the Town and subsequently invoiced to the applicant/developer. If payment is not received by the Town within 30 (thirty) days of receipt, then the Town will recover its costs for the security deposit or any other securities which have been posted for the project by the applicant/developer. In that event, the work shall cease on the project and will not commence again until the outstanding invoice has been paid in full, and the securities topped up to their original balance.

The securities will be held by the Town until the component of the project for which they were posted is complete. Authorization for the release of the securities shall be provided to the Treasury Department by either the Chief Administrative Officer or the Planning Approvals Coordinator, within their respective areas of jurisdiction.

I/We, Emily Elliott of the City of Kitchener in the Region of Waterloo solemnly declare that:

I am aware of the applicable Town of Gananoque By-law 2006-63 and 2007-29 being a By-law to establish general fees and rates for various services provided by the Town.

Furthermore, I accept the Town's peer review process whereby I agree to provide the Town of Gananoque with a deposit in the amount of \$2,000 (two thousand dollars) in order to conduct the necessary peer review(s) in the completion of my planning application. In the event that peer reviews exceed the amount, the owner/applicant is responsible to reimburse the Town and will be subject to additional invoicing for fees that the Town incurs in this regard. The Town may use the deposit to do so or any other securities being held.

Emily Elliott
Print Name – Owner/Applicant

[Signature]
Signature – Owner/Applicant

Sept 15 / 23
Date

Clerk or Manager of Planning and Development

APPLICATION FOR DEVELOPMENT PERMIT APPROVAL
Section 70.2 of the Planning Act, RSO 1990, as amended

This application form **MUST** be accompanied with **all** the submission requirements in order to be considered a complete application. **Incomplete applications will not be processed until all information is provided.**

A Pre-consultation meeting with Planning and Development staff is **REQUIRED PRIOR TO SUBMISSION** of this application. At that time, approval stream and submission requirements will be determined. **ALL** applications require the following:

ALL applications require the following:

☐
☐
☐
☐

Complete application form signed including declaration of applicant*

Proof of ownership, deed of property or offer to purchase and sale*

Legal survey and/or Building Location Survey for the subject property*

If the development is for commercial and/or employment, multi-residential – One (1) large scale paper copy of all plans shall be submitted along with one set of reduced 11" x 17" of all plans and your electronic copy. Plans are to be in a standard scale format (1:250 1:500)

☐
☐
☐

Application fee as outlined in the pre-consultation form payable to the Town of Gananoque*

Deposit fee as outlined in the pre-consultation form payable to the Town of Gananoque*

Fees payable to the Cataraqui Region Conservation Authority, if applicable. Contact the CRCA for more information.

East: open space (vacant, natural heritage)
 West: Residential, open space

CONTACT INFORMATION

Municipal Freedom of Information and Protection of Privacy Act – Personal Information on this form is collected under authority of The Planning Act and will be used to process this application.

Name of Applicant: Emily Elliott, MHBC Planning Ltd	Complete Address including Postal Code: #200-540 Bingemans Centre Dr, Kitchener ON N2B 3X9	Phone: 519 576-3650
	E-mail: eelliott@mhbcplan.com	
Name of Property Owner (if different than applicant): 1000989284 Ontario Inc.	Complete Address including Postal Code: 100 Citigate Dr, Ottawa, ON K2J 6K7	Phone: (613) 690-3389
	E-mail: rpierce@tomlinsongroup.com	
Architect/Designer/Planner: Emily Elliott, MHBC Planning Ltd	Complete Address including Postal Code: #200-540 Bingemans Centre Dr, Kitchener ON N2B 3X9	Phone: 519 576-3650
	E-mail: eelliott@mhbcplan.com	
Engineer: Kyle Nielissen, Forefront Engineering Inc	Complete Address including Postal Code: 1329 Gardiners Road, Suite 210 Kingston, ON, Canada K7P 0L8	Phone: 613 634-9009
	E-mail: Kyle.Nielissen@Forefronteng.ca	
Land Surveyor: Shawn Leroux, JD Barnes Limited	Complete Address including Postal Code: 62 Steacie Drive, Suite 103, Ottawa	Phone: 613 731-7244
	E-mail: sleroux@jdbarnes.com	

PROPERTY

Street or Property Address (if applicable): 205 Elmwood Drive	Roll Number (if known): 081400002029322
---	---

LEGAL DESCRIPTION

Lot/Con/Plan: LEEDS CON 1 PT LOT 16 RP 28R12422 PARTS 3 TO 16 21 TO 31 AND 33 TO 35 PT PART 1 RP 28R13585 PART 10			
Frontage (m/ft): irregular	Depth (m/ft): irregular	Lot Area: 28.66ac	

SUBMISSION REQUIREMENTS

The applicant/agent is responsible for ensuring that the submission requirements are met, including confirming that all the information listed below is shown on the required plans by checking off each box.

☐ **Site Plan(s)** including scaled accurate measurements of:

- Title, location and date of project including legend and scale (graphic bar scale as well as written ratio scale);
- Dimensions and areas of the site including existing natural and artificial features i.e: buildings, watercourses, wetlands, woodlands.
- Dimensions and gross floor area of all building and structures to be erected;
- Existing structures to be retained, removed or relocated;
- Distances between lot lines and the various buildings, structures, parking areas, driveways and other features;
- Proposed elevation of finished grades including area to be filled or excavated, retaining walls, drainage ditches;
- Parking areas including number, size of spaces and dimensions. The plans shall have regard for **Ontario Regulation 413/12 made under Accessibility for Ontarians with Disabilities Act, 2005**. This shall include, but not be limited to, providing appropriate designated parking spaces and unobstructed building access features.
- Access driveways including curbing and sidewalks
- Proposed fire routes and fire route sign locations
- Dimensions and locations of loading zones, waste receptacles and other storage spaces;
- Location, height and type of lighting fixtures including information on intensity and the direction in which they will shine relative to neighbouring streets and properties;
- Location of sign (sign permit to be applied for through the Building Permit process) as per By-law 2005-41;
- Location, type and size of any other significant features such as fencing, gates and walkways.

☐ **Drainage Plan(s)** including scaled accurate measurements of:

- Drainage Plan must demonstrate proposed development is handled on-site and does not infringe on neighbouring properties;

☐ **Landscape Plan(s)** including scaled accurate measurements of:

- Landscape Plan showing size, type and location of vegetation, areas to be seeded or sod. Plan to show existing landscape features to be retained, removed or relocated;

☐ **Site Servicing Plan(s)** including scaled accurate measurements of:

- Site Servicing Plan (plan/profile) including layout of existing water, sewer, gas lines, proposed connections, utility easements, fire hydrants, hydro poles, lighting, trees, transformers and pedestals.

☐ **Grade Control and Drainage Plan(s)** including scale accurate measurements of:

- Existing elevations on subject and adjacent lands and long centerline or adjacent street lines, which are to be geodetic;
- Location of any creeks, ravines or watercourses with elevations and contours;
- Arrows indicating the proposed direction of flow of all surface water;
- Location and direction of swales, surface water outlets, rip-rap, catch basins, rock, retaining walls, culverts
- Existing and/or proposed right-of-ways or easements

☐ **Elevation and Cross-Section Plan(s)** including scale accurate measurements of:

- Coloured elevation drawings or renderings of each side of the building to include materials being used and their consideration to the neighbourhood (PHOTOS OF EXISTING BUILDING ARE PERMITTED IF NO ADDITIONS ARE BEING UNDERTAKEN)
- Drawings that show plan, elevations and cross section views for each building or structure to be erected;
- Conceptual design of building;
- Relationship to existing buildings, streets and exterior areas to which members of the public have access to;
- Exterior design including character, scale, appearance and design features of the proposed building;
- Design elements of adjacent Town road including trees, shrubs, plantings, street furniture, curbing and facilities designed to have regard for accessibility
- Photographs of the subject land and abutting streetscape on both side of the street

☐ **Supporting Studies and Reports.** Technical reports/plans or studies may be required to assist in the review process of a Development Permit Application. Applications for Development Permit may be required to submit the following studies or reports. Applicants should consult with Municipal staff to determine site specific requirements:

- | | |
|---|---|
| ☐ Air, Noise or Vibration Study | ☐ Sanitary System Design & sufficient capacity |
| ☐ Archaeological Study | ☐ Servicing Options Report |
| ☐ Drainage and/or stormwater management report | ☐ Source Water Protection – Risk Management Assessment |
| ☐ Environmental Impact Assessment for a natural heritage feature or area | ☐ Sun/Shady Study |
| ☐ Erosion and Sediment Control Plan | ☐ Traffic Study |
| ☐ Geotechnical Study and Hydrogeological Study | ☐ Vegetation Inventory/Preservation |
| ☐ Heritage Resource Assessment/Study | ☐ Visual Impact Assessment |
| ☐ Hydrogeology/Groundwater Study | ☐ Water Distribution System & sufficient capacity |
| ☐ Phase I Environmental, investigation if required | ☐ Wave Uprush Study |
| ☐ Form 1's – Record of Future Alteration (Water, Sewer and Storm) | ☐ Supporting Land Use Planning Report |
| | ☐ Other: |

NOTES TO OWNER/APPLICANT:

- Applications may be subject to any Town incurred costs over and above the fees set out (See By-law 2016-047) being a by-law to establish general fees and rates for various services provided by the municipality). This is in the form of a deposit fee in the amount of \$2,000 payable to the Town of Gananoque for peer reviews of various studies as outlined in the application.
- Cataraqui Region Conservation Authority (CRCA) - Applications may be subject to review and a separate cheque payable to the CRCA. Fees are identified on the CRCA website <https://cataraquiconservation.ca/pages/permit-fees>. The Town recommends that you consult with a Conservation Authority Officer prior to making application.
- The applicant/owner may be required to provide 100% security of the cost of works in the form of a Letter of Credit or Certified Cheque upon signing of the Development Permit Agreement for all Class III applications and any Class that may require a background study or legal registration of documents.
- Security will remain with the Town until such time as the works are completed for any agreement. A 15% holdback will be maintained for a period of one year after the works are completed. This will be applicable at the time of agreement.

Existing Use(s):**Vacant**

Length of time the existing use of the subject lands have continued:

Has the property been designated as a Heritage Site? ☐ Yes ☒ NoIs the property presently under a Site Plan/Development Permit Agreement? ☐ Yes ☒ NoHas the property ever been subject of an application under Section 34 (Zoning), 41 (Site plan) or 45 (Minor Variance) of the Planning Act? ☐ Yes ☒ NoHas the property ever been subject of an application under Section 70.2 (Development Permit By-law) of the Planning Act? ☐ Yes ☒ No

If the property has been subject of applications under the Planning Act noted above, provide the file number(s) and the status of the application?

No**Proposed Use(s):****Residential**Is the **Use** permitted or permitted subject to criteria as set out in the development permit by-law? ☒ Yes ☐ No

How has the applicable criteria have been addressed?

Refer to Planning Justification ReportIs/Are variation(s) requested? ☒ Yes

If yes, what variation is requested and why?

To reduce the floodplain Setback from 30m (required) to 15m and to reduce detached lot frontage from 15m to 11m.

Demonstrate how the proposed variation meets the criteria as set out in the development permit by-law. Refer to Forefright Engineering memo which reviewed the CRCA Floodplain Mapping.

Abutting Land Use(s) – east, west, north, south:

East: open space (vacant, natural heritage)

West: low rise residential

North: low rise residential

South: St. Lawrence River

Is the Development to be phased?	☐ Yes	☐ No
What is the anticipated date of construction?		
Is the land to be divided in the future?	☐ Yes	☒ No
Are there any easements, right-of-ways or restrictive covenants affecting the subject land?	☒ Yes	☐ No
If yes, please provide details (and copies of covenants with application submission).		

Plan Details: Please ensure that measurements are consistent with plan			
☒ Residential	☐ Commercial	☐ Employment Lands/ Industrial	☐ Institutional
Building Coverage: _____ (%) _____ (sq.m)		Landscape Coverage: _____ (%) _____ (sq.m)	
Building Height:	No. of Storeys:	No. of Units:	Storage of Garbage:

Parking Area:	Existing Parking Surface			
	☐ Paved ☐ Gravel ☐ Permeable Parking Area ☒ Other			
	Proposed Parking Surface:			
	☒ Paved ☐ Gravel ☐ Permeable Parking Area ☐ Other			
	# of Existing Parking Spaces	# of New Parking Spaces	# of Accessible Parking Spaces	Total # of Parking Spaces
	Dimension of Parking Spaces (m/ft):		Dimensions of Accessible Parking Spaces (m/ft):	

LOADING SPACES, if applicable:	Number of Loading Spaces:	Dimensions of Loading Spaces (m/ft):
---------------------------------------	---------------------------	--------------------------------------

Heritage Tourist Inn/Bed and Breakfast/Short Term Accommodation*:		☐ Yes	☒ No
Is this an application for a Heritage Tourist Inn?	☐ Yes	☒ No	
Number of Guest Rooms:	☐ 1	☐ 2	☐ 3 ☐ 4 ☐ 5 ☐ 6
NOTE: A Heritage Tourist Inn will require a Heritage Resource Assessment evaluating the heritage significance of the property including a description of historic features is required with the submission of this application.			
Is this an application for a Bed and Breakfast?	☐ Yes	☐ No	
Number of Guest Rooms:	☐ 1	☐ 2	☐ 3
Is this an application for a Short Term Accommodation?	☐ Yes	☐ No	
Number of Guest Rooms:	☐ 1	☐ 2	☐ 3

Access*:	Potable Water*:	Sewage Disposal*:	Stormwater*:
☒ Municipal Street	☒ Town Owned/operated Water System	☒ Town Owned/Operated Sewage System	☒ Town Owned/Operated Sewers
☐ Existing Private Road/ Lane	☐ Private Well	☐ Private Septic and Tile Field	☐ Swales
☐ Existing Right-of-way	☐ River	☐ Other	☐ Ditches
☐ Unopen Road Allowance	☐ Other:		☐ Other
☐ Other:			
Provide any applicable hook-up approvals and/or permit number(s) applicable to the above:			

Water Access (where access to the subject land is by water only)	
Docking Facilities (specify)	Parking Facilities (specify)
distance from subject land _____	distance from subject land _____
distance from nearest public road _____	distance from nearest public road _____

EXISTING BUILDINGS:		Building 1 - Primary	Building 2 - Accessory
	Type of Structure (ie: wood concrete)		
	Date Constructed:		
	Front Line Setback:		
	Rear Lot Line Setback:		
	Side Lot Line Setback:		
	Side Lot Line Setback:		
	Height:		
	Dimensions:		
	Floor Area:		

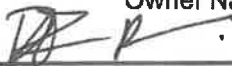
PROPOSED BUILDINGS:		Building 1 - Primary	Building 2 - Accessory
	Type of Structure (ie: wood concrete)		
	Proposed Date of Construction:		
	Front Line Setback:		
	Rear Lot Line Setback:		
	Side Lot Line Setback:		
	Side Lot Line Setback:		
	Height:		
	Dimensions:		
	Floor Area:		
Attached Additional Page, if necessary			

AUTHORIZATION BY OWNER

I/We, the undersigned being the registered owner(s) of the subject lands, hereby authorize MHBC Planning Ltd (print name) to be the applicant in the submission of this application. Furthermore, I/we, being the registered owner(s) of the subject lands, hereby authorize Town of Gananoque members of Council, Committee of Council and Municipal Staff, to enter upon the property for the purposes of conducting a site inspection with respect to the subject application.

ROB PIERCE

Owner Name (Please Print)



Signature of Owner

J. Ailey

Signature of Witness (not applicant)

Owner Name (Please Print)

Signature of Owner

Sept 4, 2025

Date

CONSENT BY OWNER

I/We, _____, (print name(s) am/are the registered owner(s) of the land that is the subject of this application for Development Purposes and for purposes of the Municipal Freedom of Information and Protection of Privacy Act. I/We hereby authorize the use, or disclosure, to any person or public body, of any personal information collected under the authority of the Planning Act of the purpose of processing this application.



Signature of Owner

J. Ailey

Signature of Witness (not applicant)

Signature of Owner

Sept 4, 2025

Date

DECLARATION OF APPLICANT

(Print) I, Emily Elliott of the City of Kitchener in the Region of Waterloo solemnly declare that:

I understand that the applicant/owner will be required to provide 100% security of the outside works in the form of a Letter of Credit or Certified Cheque until such time as the works are completed. A 15% holdback will be maintained for a period of one year after the works are completed. This will be applicable at the time of agreement.

All of the above statements contained in the application are true and I make this solemn declaration conscientiously believing it to be true and knowing that it is of the same force and effect as if made under Oath and by virtue of *The Canada Evidence Act*.

Declared/Sworn before me at

City of Kitchenerthis 15th day of September, 2025.

David William Aston, a Commissioner, etc.,
Province of Ontario for MacNaughton Hermes
Barton Clarkson Planning Limited.

Expires January 9, 2026
Signature of a Commissioner, etc



Signature of Applicant

Office Use Only:		Roll No: 081400002029322
Official Plan Designation: Residential	Development Permit Designation: Residential	Other:
Access (Entrance Permits etc):	Water and Sewer Hookup (Permits etc):	Other:
Other Concurrent Applications:	☐ Cash-in-Lieu of Parking ☐ condo Approval ☐ Consent/ Severance	☐ Official Plan Amendment ☒ Subdivision Approval
Date Application Received: September 15, 2025	Date Application Deemed Complete: January 5, 2026	Fees Received: September 15, 2025

For additional details please contact: Brenda Guy, Manager of Planning and Development
 Town of Gananoque, 30 King Street East, Gananoque, ON K7G 1E9
 (613) 382-2149 ext.1126 E-mail: bguy@gananoque.ca

Peer Review/Consultant Services

In order to streamline the Town of Gananoque's planning process, professional or peer review services may be contracted out by the Town under By-law 2004-63 and amending By-law 2007-29. These may include but are not limited to the following:

Condominium Applications	Air, Noise or Vibration Study	Sanitary System Design & sufficient capacity
Consent Applications	Archaeological Study	Servicing Options Report
Cost Estimate of Works	Drainage and/or stormwater management report	Source Water Protection – Risk Management Assessment
Development Permit Applications	Environmental Impact Assessment for a natural heritage feature or area	Sun/Shady Study
Official Plan Amendment	Erosion and Sediment Control Plan	Traffic Study
Local Planning Appeal Tribunal	Geotechnical Study/Hydrogeological Study	Vegetation Inventory/Preservation
Part Lot Control	Heritage Resource Assessment/Study	Visual Impact Assessment
Subdivision Applications	Hydrogeology/Groundwater Study	Water Distribution System & sufficient capacity
	Phase I Environmental, investigation if req'd	Wave Uprush Study
	Form 1's – Record of Future Alteration (Water, Sewer and Storm)	Supporting Land Use Planning Report

The use of and choice of peer review contract consultants for either planning or engineering on any specific project are subject to the approval of either the Manager of Planning and Development or the Director of Public Works within their respective areas of jurisdiction.

All costs for the peer review consultants and legal costs for preparation of agreements and/or registration shall be fully paid by the applicant/owner. A deposit will be received by the Town as part of application submission requirements in the amount of \$2,000 (two thousand dollars). Any costs above and beyond the initial security will be invoiced to the applicant/owner.

All invoices shall be paid by the Town and subsequently invoiced to the applicant/developer. If payment is not received by the Town within 30 (thirty) days of receipt, the Town will recover its costs from any other securities which have been posted for the project by the applicant/owner.

The securities will be held by the Town until the component of the project for which they were posted is complete. Authorization for the release of the securities shall be provided to the Finance Department by either the Clerk or the Manager of Planning and Development, within their respective areas of jurisdiction.

I/We, Emily Elliott of the City of Kitchener in the Region of Waterloo solemnly declare that:

I am aware of the current Town of Gananoque General Fees and Rates for various services provided by the Town.

Furthermore, I accept the Town's peer review process whereby I agree to provide the Town of Gananoque with a deposit in the amount of \$2,000 (two thousand dollars) in order to conduct any necessary peer review(s) as deemed by the Town or preparation of legal agreements including registration in the completion of my planning application. In the event that payment is not received for such peer reviews, the Town may use the deposit to do so or any other securities being held.

Emily Elliott
Print Name – Owner/Applicant

EE Elliott
Signature – Owner/Applicant

Sept 15/25
Date

Manager of Planning/Development or his/her designate

LEGAL DESCRIPTION
PART OF LOT 16, CONCESSION 1,
GEOGRAPHIC TOWNSHIP OF LEEDS
TOWN OF GANANOQUE
COUNTY OF LEEDS

I HEREBY AUTHORIZE MACNAUGHTON HERMSEN BRITTON CLARKSON PLANNING LIMITED
TO SUBMIT THIS PLAN FOR APPROVAL.

SURVEYOR'S CERTIFICATE

I HEREBY CERTIFY THAT THE BOUNDARIES OF THE LAND TO BE SUBDIVIDED ON THIS PLAN AND THEIR RELATIONSHIP TO THE ADJACENT LANDS ARE ACCURATELY AND CORRECTLY SHOWN.

KEY PLAN

A map of the study area in the Township of Carleton Place, Ontario. The map shows a network of roads including Highway 401, Highway 10, and the Thousand Islands Parkway. A specific area of land, outlined in black and filled with diagonal hatching, is identified as 'Subject Lands'. This area is located south of Highway 10 and east of Highway 401, near the intersection with St. Lawrence Street. Other labels on the map include 'CONCRETE ROAD 2', '200-01 E', '200-02 W', and 'St. Lawrence Street'. A legend in the top right corner shows the hatched pattern for 'Subject Lands'. A north arrow and a scale of 1:45,000 are located in the bottom right corner.

Required Under Section 51 (17) of the Planning Act, R.S.O., 1990, c.P.13 as Amended

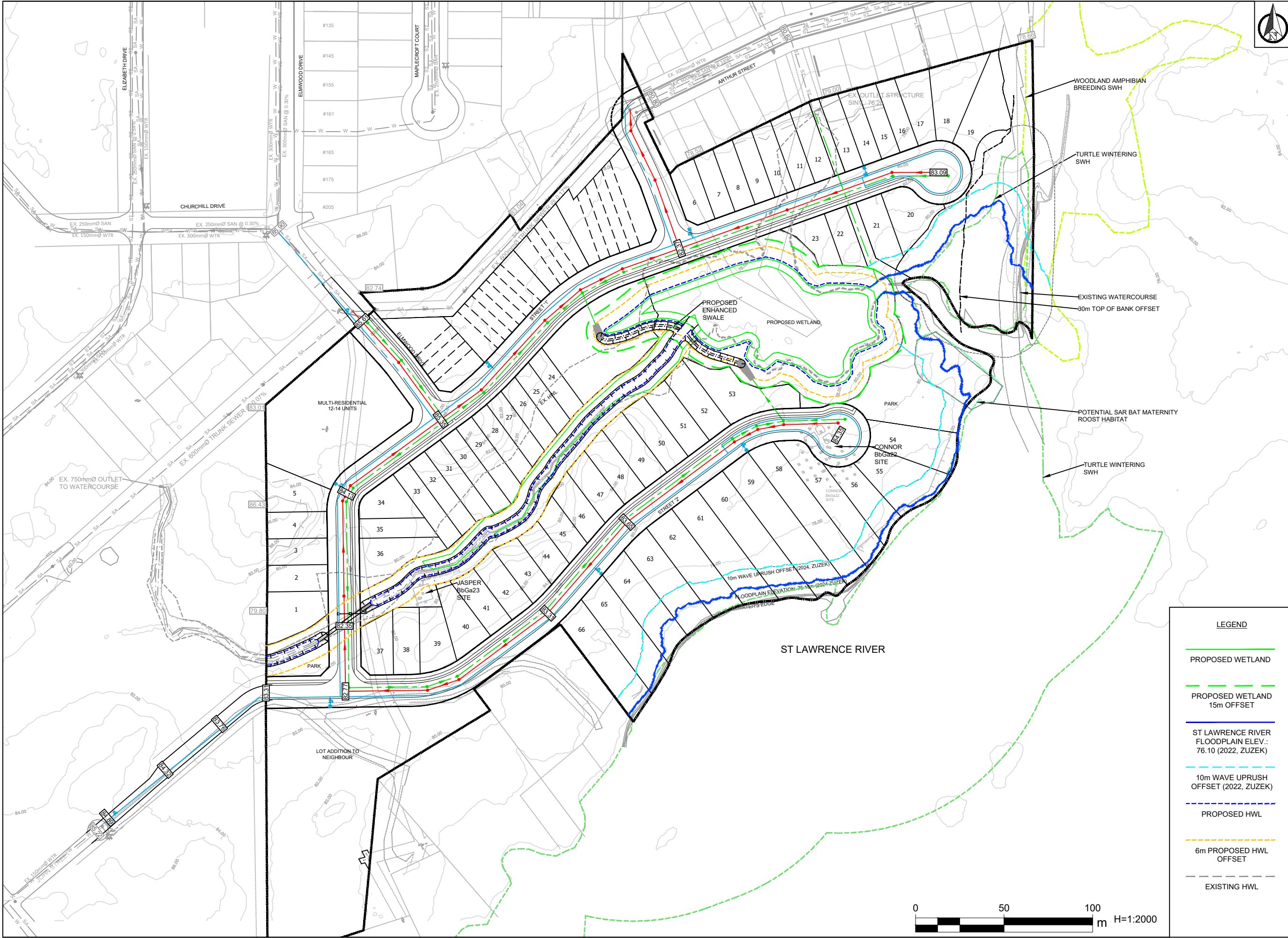
(a) As Shown	(e) As Shown	(j) As Shown
(b) As Shown	(f) As Shown	(k) Services As Required
(c) As Shown	(g) As Shown	(l) As Shown
(d) Residential, Park, Open Space, Servicing	(h) Municipal Water Supply	
	(i) Unknown	

DESCRIPTION	LOTS/BLOCKS	UNITS	AREA
Low Density Residential - Singles	1-66	66	4.597 ha
Low Density Residential - Townhouses	67-70	23	0.614 ha
Multiple Residential	71	12-14	0.440 ha
Residential Lot Addition	72		0.955 ha
Parks	73-74		0.516 ha
Open Space	75-77		2.184 ha
Servicing	78-79		0.243 ha
Servicing/Trail Connection	80		0.039 ha
Future Development	81-82		0.012 ha
Roads			1.986 ha
Total	82	101-103	11.586 ha

1. All dimensions are in metres unless otherwise shown.
2. Environmental features provided by WSP, 2025-05-23, & FFE, August 2025
3. Boundary information has been compiled from Plan 28R-15673 and Confirmed by field Survey by J.D. Barnes Ltd. May 13, 2025
4. Contains information licensed under the Open Government Licence - Ontario.

Stamp	Date	May 28, 2026
	File No.	9137BK
	Plan Scale	1:1000 (Arch D)
	Drawn By	JB
	Checked By	EE

Scale Bar 0 10 25 50 100m



Benchmark		
No.	Revision/Issue	Date

Forefront

Engineering Inc

1329 Gardiners Road, Suite 210
Kingston, ON, Canada K7P 0L8
613.634.9009 tel.
1.866.884.9392 fax.

Client

1000989284 ONTARIO INC.

Project

VL - ELMWOOD DRIVE

Drawing

CONCEPT PLAN

Drawn by:

EP

Checked by:

JH

Project No.

Designed by:

KMN

Approved by:

KMN

Drawing No.

Date:

MAY 2026

Scale:

1:2000
ANSI B (11x17)

CP

LEGEND

PROPOSED WETLAND

PROPOSED WETLAND
15m OFFSET

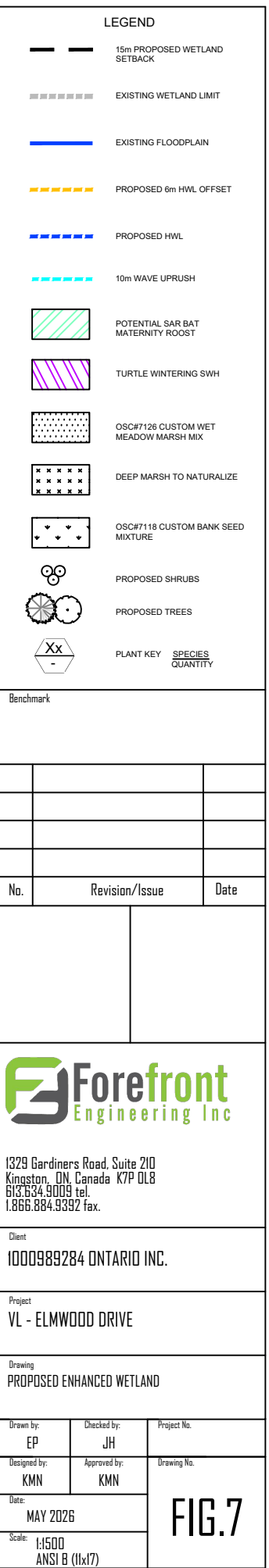
ST LAWRENCE RIVER
FLOODPLAIN ELEV.:
76.10 (2022, ZUZEK)

10m WAVE UPRUSH
OFFSET (2022, ZUZEK)

PROPOSED HWL

6m PROPOSED HWL
OFFSET

EXISTING HWL



CONCEPTUAL MASTER PLAN

VL - ELMWOOD DRIVE
TOWN OF GANANOQUE

-  Possible Location of Duck Boxes
-  Possible Location of Bat Boxes



Concept design prepared by MHBC Planning.
AI-assisted rendering has been used to
create this graphic. This image is conceptual
and may not represent final site or building design.

JUNE 2026



PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE