



June 2, 2026

Brenda Guy, Manager of Planning and Development
Town of Gananoque
30 King Street East
Gananoque, ON K7G 1E9

Dear Brenda:

RE: VL – Elmwood Drive, Town of Gananoque - Development Permit Approval and Plan of Subdivision
OUR FILE: 9137BK

On behalf of our client, 1000989284 Ontario Inc., MHBC submitted applications for Development Permit Approval and Plan of Subdivision Approval on September 27, 2025 for the lands known as VL – Elmwood Drive. Following the initial submission, the Town and its agencies reviewed the applications and provided comments. This letter summarizes the revisions made to the Draft Plan of Subdivision in response to those comments. The Draft Plan has been updated and is summarized below, with updated density calculations provided in Appendix A to this letter.

1. Central Wetland

- The central wetland will be preserved, with only minimal alterations proposed to the watercourse. The protection of this natural heritage feature has been a primary consideration in redesigning the plan.
- To minimize disturbance to the central wetland and watercourse, several lots previously located along the northern edge adjacent to the wetland have been reconfigured. A new park block has been introduced in place of these former lots, providing a protective buffer between the development and the wetland.

2. Park Blocks

- A new park block, identified as Block 73, has been added to the Draft Plan. Block 73 has an area of 0.26 hectares and is situated adjacent to the central wetland, providing both an ecological buffer and publicly accessible open space.
- In light of the addition of Block 73, the park block adjacent to the St. Lawrence (Block 74) has been reduced in area to 0.25 hectares. The overall provision of public parkland across the plan remains appropriate, with the two blocks together ensuring adequate open space is distributed throughout the development. The parkland area meets the Planning Act's requirement of 5%.

3. Density

- The overall density and mix of unit types have been increased. The total density for the development has increased to over 12 units per hectare. A density analysis is attached to this letter as **Appendix A**.
- Multiple residential unit forms have been incorporated into the revised plan, including four blocks of street-fronting townhouses (Blocks 67–70) and one block for cluster townhouses (Block 71). The increase in density and unit type improves the plan's ability to accommodate a range of housing needs. Conceptual Plans for the multiple blocks have been included as **Appendix B**.
- Lots for smaller single-detached dwellings have also been provided. These lots have 11 metre frontages are located on the north side of the Street A. These lots also contribute to the range and mix of housing that will be available in the community.
- The total number of units is increased to approximately 103, including:
 - 66 single-detached units
 - 23 street townhouse units
 - 12–14 cluster townhouse units
- This expanded and varied unit mix will support housing affordability by offering a broader range of housing options suited to different demographics and socio-economic needs.

4. Roads and Access

- A new road connection is proposed. Arthur Street will now extend to connect with proposed Street One, effectively linking two previously disconnected segments of Arthur Street. This connection improves internal circulation and provides more direct access through the subdivision. It is acknowledged that a draft plan condition will be included requiring the necessary land acquisition to complete the new road.
- The Street Two cul-de-sac has been redesigned in response to the modifications made to park Block 74. The cul-de-sac has been extended slightly to accommodate the revised configuration. To facilitate this extension, as well as to allow for the future development of Lots 55, 56, and 57, a Draft Plan condition will be required for a Stage 4 Archaeological Assessment to clear this area prior to development. As such, a temporary access will likely be required during construction while the Stage 4 is completed.

As a result of the changes to the Draft Plan, the proposed amendment to the Development Permit By-law has been updated accordingly. The amendment addresses the following:

- **Reduced Lot Frontage:** The minimum lot frontage for single detached dwellings in the Residential designation is 15 metres pursuant to Section 5.3.2 of the Development Permit By-law. As a result of lot reconfiguration, several lots will have frontages less than 15 metres, to a minimum of 11 metres. Specifically, Lots 7–19, 22, 24–33, and 35. The proposed Development Permit By-law amendment establishes a minimum lot frontage of 11 metres applicable to these lots only.

The reduced frontages are a result of two factors. First is the new Arthur Street connection which impacts lot frontage that can be achieved while still achieving higher densities. Second

is the required environmental buffers associated with the central wetland and the floodplain associated with the watercourse, which constrain the buildable area and lot configuration in proximity to these features. As a result, the draft plan proposes to maintain a similar detached lot configuration by reducing lot frontages in this area of the subdivision.

Notwithstanding the reduced frontages and the floodplain constraint in the rear of the lots, all lots comply with the remaining site provisions of the Residential designation, including minimum lot area, front yard setback, interior and exterior side yard setbacks, lot coverage, and building height as demonstrated through the preparation of conceptual lot plans, included as **Appendix C**. The proposed minimum frontage of 11 metres is consistent with contemporary subdivision design and can accommodate functional detached dwellings while providing adequate parkland and access.

- **Stage 4 Archaeological Condition – Street Two and Lots 55, 56, and 57:** A condition of approval for a portion of Street Two, and a site specific exception is proposed for Lots 55, 56, and 57, recognizing that these lands require the completion of a Stage 4 Archaeological Assessment prior to development proceeding.

The revised Draft Plan continues to protect all significant natural heritage features and their associated buffers. A 15 metre setback from the floodplain is maintained for all lots adjacent to the St. Lawrence River, and a 6 metre setback from the watercourse is maintained for proposed lots adjacent to the watercourse. In addition, adequate open space is provided throughout the plan with two parks and a trail connection.

The changes to the Draft Plan are intended to fully address the outstanding comments received from the Town and the Conservation Authority. We are of the view that the revised plan represents a meaningful improvement over the original proposal and satisfies the identified concerns. The following materials have been resubmitted in support of the revised Draft Plan:

- Updated Draft Plan, prepared by MHBC, dated May 15, 2026;
- Conceptual Draft Plan, prepared by MHBC, dated May 2026;
- Updated Development Permit By-law and Schedules, prepared by MHBC;
- Environmental Impact Assessment Addendum Letter, prepared by WSP, dated June 2, 2026;
- Updated Sanitary, Water and Stormwater reports and plans, prepared by Forefront Engineering, dated May 2026
- Updated Geotechnical Investigation; prepared by Malroz Engineering Inc, dated May 28, 2026 and
- Comment and Response Matrix.

We trust the enclosed materials satisfy your requirements to continue processing the application. Should you have any questions or require additional information, please do not hesitate to contact the undersigned.

We look forward to continued collaboration with the Town on this matter.

Yours truly,
MHBC

A handwritten signature in black ink, appearing to read "E. Elliott".

Emily Elliott, BES, MCIP, RPP
Partner

A handwritten signature in black ink, appearing to read "G. Smith".

Gillian Smith, MA, MCIP, RPP
Senior Planner

cc. Jennifer Ailey

Appendix A:

Density Summary

Table 1.0 – Draft Plan Overview

Description	Blocks	Units	Area (ha)	Percentage of Subdivision
Residential - singles	1-66	66	4.597	39.7%
Residential - townhouses	67-70	23	0.614	5.3%
Residential - multiple	71	12 - 14	0.44	3.8%
Residential Lot Addition	72		0.955	8.2%
Parks	73-74		0.516	4.5%
Open Space	75-77		2.184	18.9%
Future Development	81-82		0.012	0.10%
Servicing	78-79		0.243	2.10%
Servicing/Trail Connection	80		0.039	0.34%
Roads			1.986	17.1%
TOTAL			11.59	100.0%

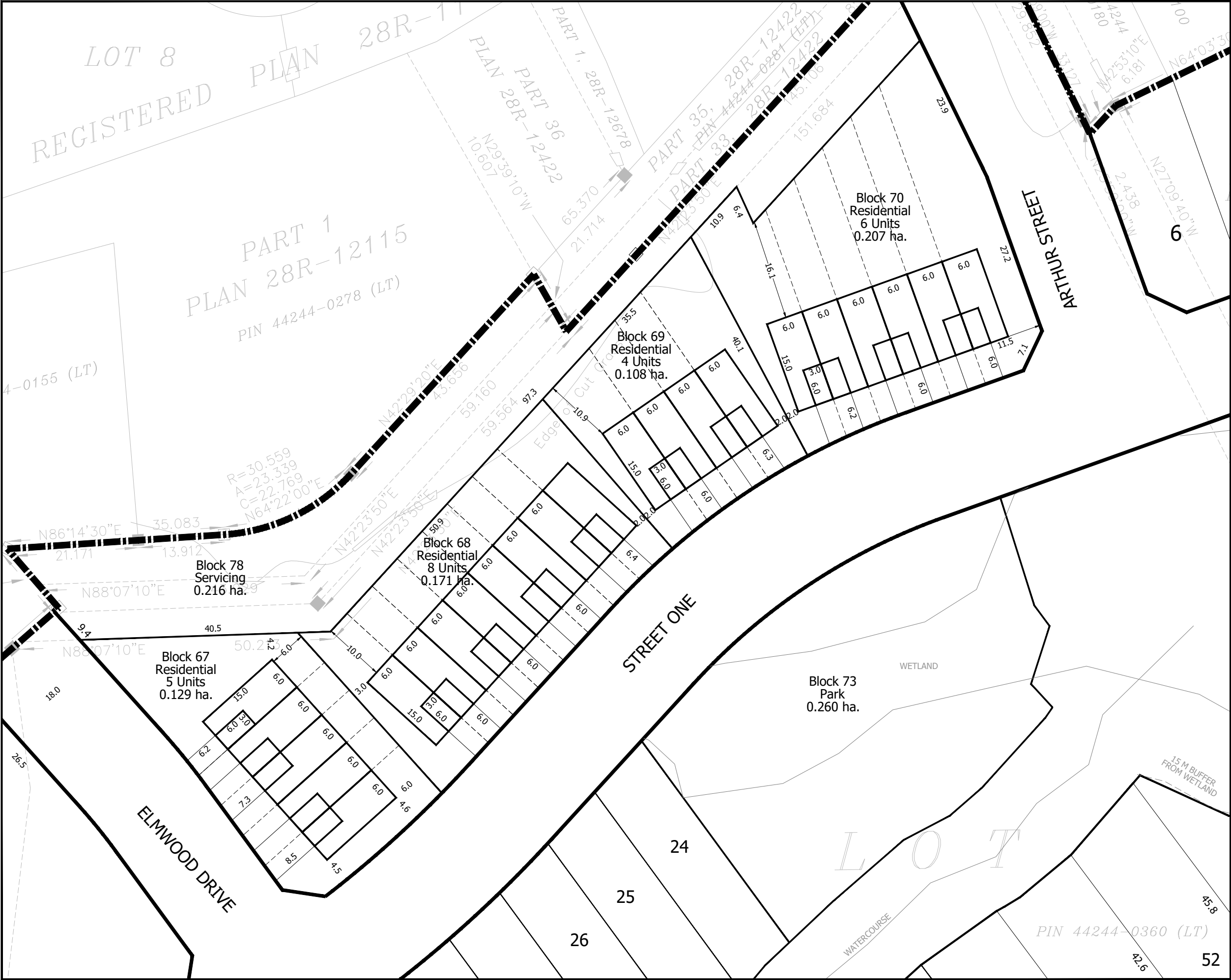
Table 2.0 – Density Overview

Types of Units	No of Units	PPU*	Total Persons	Total Jobs **
Singles/Semis	66	2.632	173.712	3.47424
Towns and Multiples	37	2.03	75.11	2.2533
Total	103	4.662	248.822	5.72754
TOTAL			254.55	

Density Summary	
Gross Area	11.59
Lands Excluded	3.139
Net Area	8.447
Persons & Jobs per ha	30.13
Units per ha	12.19

Appendix B:

Multiple Block Concepts



CONCEPT PLAN - BLOCKS 67-70

VL - Elmwood Drive, Gananoque
Ontario

9137BK

LEGEND

 Subject Lands: 11.586 ha

- NOTES**
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

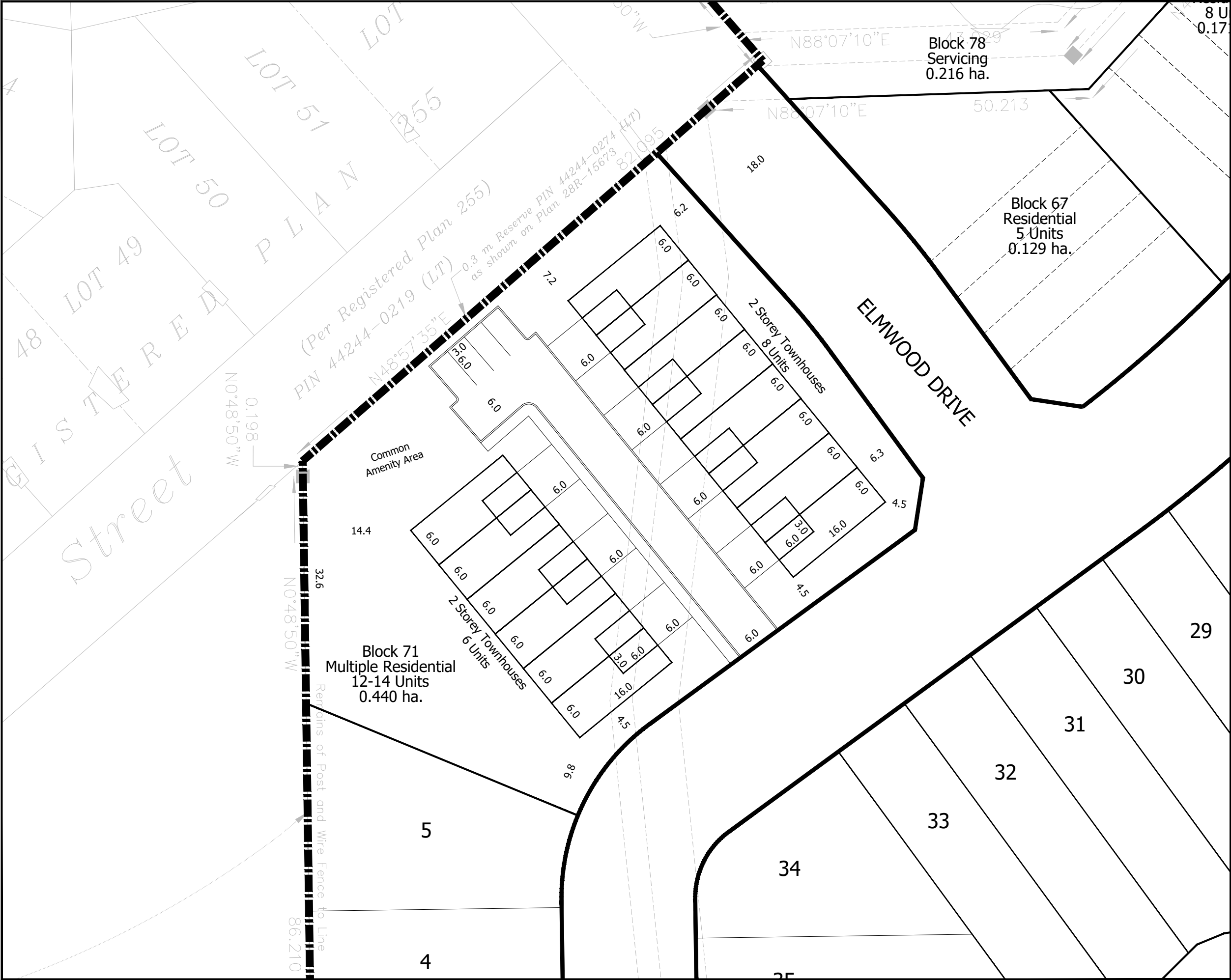
DATE: May 27, 2026

0 6 12 18 24 m

SCALE: 1:500



K:\9137BK - 205 Elmwood Drive, Gananoque\CP\9137BK_Concept Plan - Street Townhouses_27May2026.dwg



CONCEPT PLAN - BLOCK 71

VL - Elmwood Drive, Gananoque
Ontario

9137BK

LEGEND

 Subject Lands: 11.586 ha

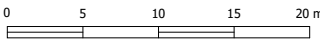
14 2-Storey Townhouse Units

4 Visitor Parking Spaces (0.28/unit)

NOTES

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

DATE: May 27, 2026



SCALE: 1:500



K:\9137BK - 205 Elmwood Drive, Gananoque\CP\9137BK_Concept Plan - Multiple Block_27May2026.dwg

Appendix C:

Single Detached Concept



CONCEPT PLAN - LOTS 24-29

VL - Elmwood Drive, Gananoque
Ontario

9137BK

LEGEND

 Subject Lands: 11.586 ha

- NOTES**
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

DATE: May 28, 2026

0 4 8 12 16 m

SCALE: 1:750

