

Proposed development at Perth golf course

Table of contents

Learn more and get involved	1
Contact info	2
Questions for Town re: Environmental Issues	2
Participant's Statement re: Environmental issues	4
NEW ISSUES	4
New Issue 1: Headwater watercourse, fisheries assessment & DFO permit	4
New Issue 2: Detailed mapping of NHFs in updated EIS	5
New Issue 3: Net benefits cannot be determined or are inadequate	5
New Issue 4: Endangered/Threatened Species and Significant Wildlife Habitats	6
New Issue 5: Floodplain encroachments & climate related flood levels	8
New Issue 6: Mitigate negative impacts of cut & fill	9
New Issue 7: Exclusion fencing for lots encroaching on NHF or floodplain	9
New Issue 8: Inadequate vegetation compensation	10
UNRESOLVED FROM PREVIOUS ISSUES LIST	10
APPENDIX 1: Draft Plan & Map with NHF Setbacks	15
APPENDIX 2: Schedule B & Map with Bat Colonies	16
APPENDIX 3: Schedule B & Map with Gray Ratsnake	17
APPENDIX 4: Petition Text & Comments	18
SOURCES	19

Learn more and get involved

- 1) Read the points from the Perth Citizens for Sensible Development 2025 [Petition and our assessment of the status in the settlement](#).
 - If you're concerned about the environmental issues, keep reading this document.
- 2) Review the files on [Engage Perth](#) and [call/email](#) Council and staff with your concerns.
- 3) Attend the "[Public Information Centre](#)" on June 11 at 5:30pm at The Legion.

Contact government officials

Tell them your concerns. This is not a 100% done deal.

1. **Put pressure on Town staff and Town Council by emailing Town staff and CCing Council.**
 - a. Development services, includes zoning, proposed development: jbowes@perth.ca, Joanna Bowes, Director, 613-267-3311 ext. 2235
 - b. Environmental services, includes traffic and environment: facilities@perth.ca, Grant Machan, Director of Environmental Services, 613-267-3311 ext. 2233
 - c. Protective services, includes safety/emergency access: firechief@perth.ca, Trevor Choffe, Director of Protective Services/Fire Chief, 613-267-3311 ext. 2266
 - d. Council: council@perth.ca
2. **Put pressure at the provincial level**, so they know Perth citizens are upset. (The Ontario Land Tribunal and Conservation Authorities are overseen by the province.)
 - a. Province oversight includes housing, emergency response (Ministry of Emergency Preparedness and Response), environmental assessments: John.Jordan@pc.ola.org, John Jordan, MPP, 613-284-1630
 - b. Ontario Land Tribunal: Mary.Filipetto@ontario.ca, Mary Filipetto, OLT coordinator for case: OLT-23-000534 – CAIVAN - Town of Perth - County of Lanark
3. **Contact our MP.**
 - a. Federal oversight includes housing policy, fish habitats, migratory birds, endangered species list: scott.reid@parl.gc.ca, Scott Reid, MP, 1-866-277-1577
4. **Tips:**
 - a. **Express your concerns with your own words, if possible.**
 - b. **You can copy/paste your message to different people.** (You might customize an intro sentence for a particular recipient.)
 - c. **Calls are generally “weighted” slightly heavier than emails.**

Questions for Town re: Environmental Issues

- New Issue 1: Given condition 63 (in Schedule A to Draft Plan Approval Decision), the presence of coarse fish species in the headwater watercourse (Drainage Feature A), and the partial encroachment into the Waterway Linkage Corridor Setback (defined by Rob West), **will the Town add a fisheries assessment and a DFO permit as an additional condition to the approval of the plan?** (If adding a condition is not possible, at the very least, will the Town communicate with the DFO and, before accepting an updated EIS, ensure the EIS determines no negative impacts on fish species and fish habitat within this linkage setback?)
- New Issue 2: Given that condition 23 (in Schedule A to Draft Plan Approval Decision) allows the EIS to be updated to the satisfaction of the Town, will the Town, before accepting an updated EIS, **ensure the EIS contains detailed mapping of Natural**

Heritage Features, and especially the 6 Significant Wildlife Habitats mapped and detailed by Rob West, which are necessary to determine whether conditions 65 through 68, pertaining to endangered/threatened species and their habitats, will be met or not?

- New Issue 3: Will the Town push for increased protection and ecological compensation for the encroachments into the Significant Woodland Setback and the Waterway Linkage Corridor Setback (see purple dotted line and yellow dotted line respectively in Appendix 1); and before accepting an updated EIS, **ensure the EIS determines no negative impacts within the Significant Woodland Setback and the fish habitat within the Waterway Linkage Corridor Setback?**
- New Issue 4: Will the Town, before accepting an updated EIS, **ensure the EIS thoroughly surveys/identifies and determines no negative impacts on species at risk bats, gray ratsnakes, black ash, and other endangered/threatened species due to the development or site alteration?**
- New Issue 5: Given the proximity of the proposed development to the floodplain, the risk of more extreme and increasingly frequent flood events must be considered in the floodplain mapping data and in the cut and fill process. Will the Town and RVCA ensure the highest standards by: **using LiDAR data that includes terrestrial laser scanning for greater accuracy; adding 10% cut volume per each slice to account for climate related flood increase; and treating the area between the 1 in 100-year flood plain and the 1 in 350-year flood plain as climate change flood vulnerable area?**
- New Issue 6: If the developer intends to bring all of the building lots and stormwater management lots out of the floodplain by employing cut and fill, will the Town **ensure that the following are completed before any site alteration via cut and fill begins: detailed mapping of NHFs (New Issue 2); determination of net benefits (New Issue 3); and protection of endangered/threatened species (New Issue 4)?**
- New Issue 7: If the developer is determined to build within the setbacks of Natural Heritage Features (including the Significant Woodland Setback, the Provincially Significant Wetland Setback, and the floodplain), will the Town ensure that the developer provides the exclusion fencing they have agreed to in conditions 31 and 62 (in Schedule A to Draft Plan Approval Decision)? **Note: this would necessitate that exclusion fencing break up lots and/or separate large areas from the rest of the development** (see purple, pink, and yellow dotted lines in Appendix 1 of attached file).
- New Issue 8: Since condition 69 (in Schedule A to Draft Plan Approval Decision) is extremely vague, will the Town **elaborate in condition 69 what adequate “vegetation compensation” would entail, including the ratio of the lost area (including setback area) to compensatory area, the type and quality of the compensatory planting, and what is being removed by the compensatory planting?**

Participant's Statement re: Environmental issues

Draft Updated 6/2/26 - by Bonita Eloise Ford

NEW ISSUES

New Issues 1 through 5 below address the settlement files released in May 2026.

New Issue 1: Headwater watercourse, fisheries assessment & DFO permit

From Schedule A to Draft Plan Approval Decision:

- **“63. The owner acknowledges and agrees that any development or site alterations that occur within 30 m of a hydrological feature (includes Tay River, its associated riverine unevaluated wetland and the PSW), that could impact fish habitat shall be subject to a fisheries assessment and/or DFO permit.”**

From Rob West's Witness Statement:

- **“the headwater watercourse referred to as Drainage Feature A in the EIS should be a protected feature. This feature was identified to contain coarse fish species in the EIS, which supports the food chain in the Tay River. It also provides a connective waterway between the Tay River and Grant's Creek PSW for other wildlife such as Special Concern turtles. I have included a 15 m setback off this feature as it is effectively an extension of the Significant Woodland and unevaluated wetland features that it drains towards, whereby both possess a 15 m setback.”**

From Official Plan Amendment, 8.10.6.2:

- **“1. Ensure all natural heritage features and their functions are identified in an Environmental Impact Statement (EIS)... and to the satisfaction of the Town, including... fish habitat and important linkages between them. These features and their functions shall be protected, and enhanced, where possible. Development shall have no negative impacts on the natural features or on their ecological function”**

Comments:

- At least 2 lots and part of Street A encroach partly into the Waterway Linkage Corridor Setback (yellow dotted line in Appendix 1).
- **CALL TO ACTION: Given condition 63 (in Schedule A to Draft Plan Approval Decision) above, the presence of coarse fish species in the headwater watercourse, and the partial encroachment into the Waterway Linkage Corridor Setback (see yellow dotted line in Appendix 1), I urge the Town to add a fisheries assessment and a DFO permit as an additional condition to the approval of the plan.**
 - If adding a condition is not possible, at the very least, I urge the Town to communicate with the DFO and, before accepting an updated EIS, to ensure the EIS determines no negative impacts on fish species and fish habitat within this linkage setback.

New Issue 2: Detailed mapping of NHFs in updated EIS

From Schedule A to Draft Plan Approval Decision:

- “23. The Owner shall submit or update the following reports and plans... **All reports shall be updated to the satisfaction of the Town of Perth... b. Environmental Impact Study**”
- Conditions 65 through 68 pertain to endangered/threatened species and their habitats.

From Witness Statement of Rob West, Senior Ecologist:

- “How can an expert discern what the potential negative impacts will be on the overall form and function of a NHF [Natural Heritage Features], when they have not mapped the areas and reviewed them in the context of the proposed development? **The EIS should identify the NHF on a map and estimate what the loss to that NHF would be.**” Additionally, “the EIS does not map any of the confirmed [Significant Wildlife Habitat] SWH onsite.”

Comment:

- **CALL TO ACTION: Given that condition 23 (in Schedule A to Draft Plan Approval Decision) allows the EIS to be updated to the satisfaction of the Town, I urge the Town, before accepting an updated EIS, to ensure the EIS contains detailed mapping of Natural Heritage Features, and especially the 6 Significant Wildlife Habitats mapped and detailed by Rob West, which are necessary to determine whether conditions 65 through 68 will be met or not.**

New Issue 3: Net benefits cannot be determined or are inadequate

From Official Plan Amendment, 8.10.6.2:

- “2. **Development adjacent to water bodies shall be setback 30 metres except where it can be shown that a net benefit can be achieved to enhance, restore, or protect the values or functions associated with the feature.**”

From the 2019 Consolidated Official Plan, 8.6.4, c.1:

- “**Development and site alteration shall not be permitted on adjacent lands (120m) to fish habitat unless it has been demonstrated through the preparation of an Impact Assessment as required in Section 8.5.4 e. EIS of this Plan, that there will be no negative impacts on the natural features or on their ecological functions**”

From Witness Statement of Rob West, Senior Ecologist:

- “#6 The EIS includes a variety of measures to mitigate impacts to NHFs. However, without a scaled map to identify how and where these areas are, **it is not feasible to determine whether it will be a net benefit or whether the imposition by the development will result in excessive negative impacts to the feature.**”

p.6

- “the [EIS] falls short of defining the boundaries/locations of these features and identifying whether there would be a negative impact on the features.... **the proposed development does not appear to have any regard for these areas nor the setbacks that are meant to protect** the naturalness of the site and adjacent waterways.”

Note: a few conservation authorities now have high standards for ecological offsetting policies.¹

Comments:

- With **over 125 lots encroaching into the Significant Woodland Setback** (see purple dotted line in Appendix 1), the woodland is the NHF that would potentially lose the largest area. The EIS lacks the mapping to adequately determine “net benefit”.
- Further, as noted in New Issue 1 above, “the headwater watercourse... was identified to contain coarse fish species”. While Rob West gave this area a 15 m setback as “an extension of the Significant Woodland and unevaluated wetland features”, I would further argue that this area requires a 120 m setback due to it being fish habitat.
- **CALL TO ACTION: I urge the Town to push for increased protection and ecological compensation for the encroachments into the Significant Woodland Setback and the Waterway Linkage Corridor Setback** (see purple dotted line and yellow dotted line respectively in Appendix 1); and before accepting an updated EIS, to ensure the EIS determines no negative impacts within the Significant Woodland Setback and the fish habitat within the Waterway Linkage Corridor Setback.

New Issue 4: Endangered/Threatened Species and Significant Wildlife Habitats

From both 2020 PPS, 2.1.7 and from the 2019 Consolidated Official Plan, 8.6.4, g.3:

- “**development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.**”

From the 2019 Consolidated Official Plan, 8.6.4, g.4:

- “**On land adjacent to the Significant Habitat of ETS [endangered and threatened species] (i.e. within 120m) development and site alteration shall not be approved unless an EIS by a qualified consultant is completed and evaluates the ecological function of the adjacent land and demonstrates that there will be no negative impacts on their ecological function with respect to the identified significant habitat.**”

From the 2022 Consolidated Zoning By-Law, section 4.31:

- “No use of land, buildings or structures except a Conservation Use shall be permitted within the distances prescribed below of an identified natural heritage feature... except where an Impact Assessment and/or mitigating measures or conservation practices are implemented... **habitat of Endangered & Threatened Species 120 m... Significant Wildlife Habitat 120 m**”

The PPS and the Town’s policies above apply to the following species, which are endangered/threatened (from Witness Statement of Rob West, Senior Ecologist):

- Endangered Bats – Little Brown Myotis and Tri-colored Bat: “**All six (6) acoustic stations detected SAR [species-at-risk] bats, which is a significant finding, suggesting the wooded areas on-site (including those directly within the golf course) potentially represent habitat for endangered bat species.** The additional comment stating that numbers were low is to be expected, considering these endangered bats are typically fewer in number compared to more common bat species. In regards to the limited transient presence, it is my opinion that due to the location of the detectors being in the open areas, this may not be the correct interpretation. Instead, if good quality snags [standing dead trees] are present in the wooded areas, there is the possibility that concentrated SAR bats could occur on the subject property.”
- Gray Ratsnake: “The search effort provided in the EIS did not reference the specific protocols for detecting Eastern Gray Ratsnake, therefore, detections were likely hindered.... The 10 or more snake survey dates **did not discuss how much time was spent... suggesting that hibernaculum surveys may not have been completed.** Nor does there appear to have been any additional surveys completed during the emergence period”
- Black Ash: “The province has since released the Recovery Strategy for Black Ash and the **main recommendation to protect the individual appears to be the application of a 28 m setback.... The subject site contains both swampy conditions that contain an abundance of Black Ash and also individuals that have not been identified in the EIS.** Therefore, until such time any individual Black Ash have been identified within the proposed development area or within any of the potential crossings along the Tay River, there is the **potential to negatively impact this Endangered species.**”

From a study on Overall Benefit Permits (OBP) in Ontario:

- A March 2026 study through Carleton University examined 412 OBPs. They stated that “offsetting [as] a tool to mitigate biodiversity loss by compensating for adverse human impacts... should be considered a last resort relative to protection or management”. They found that: “Overall, it was unclear whether the actions approved in OBPs would be sufficient to achieve net gains for SAR, as many permits lacked Species Management Actions and most permits did not include explicit timelines for completion.”²

Comments:

- Given that: the presence of 6 species at risk [SAR] bats in the open areas suggests the wooded areas are potential habitat; the gray ratsnake survey protocols and dates/lengths appear inadequate; in the overlaid maps (see Appendices 2 and 3), most of Area G is within bat maternity colonies and/or gray ratsnake habitat; and the presence of Black Ash trees has not been fully identified; it is unacceptable that Area G remain designated Residential Area and that over 125 lots encroach into the Significant Woodland Setback (see purple dotted line in Appendix 1) without a very thoroughly updated EIS and significant compensation for losses.
- **CALL TO ACTION:** Further to New Issues 2 and 3 above, **I urge the Town, before accepting an updated EIS, to ensure the EIS thoroughly surveys/identifies and determines no negative impacts on species at risk bats, gray ratsnakes, black ash, and other endangered/threatened species due to the development or site alteration.**

New Issue 5: Floodplain encroachments & climate related flood levels

From the Draft Plan and the updated Flood Plain Overlay from February 2026, it appears that Stormwater Management blocks 626, 627, and 628 are partly within the floodplain and over 40 lots are partly or fully within the floodplain. **Note the increase in approximately 60 buildable lots from the updated Flood Plain Overlay.**

By contrast, based on the Flood Map Viewer (published in 2020 through the University of Western Ontario and funded by Natural Sciences and Engineering Research Council of Canada):

- **During a 100-year flood event, most of the site is under 2.05 m of water**—rather than only small portions of it.³ Engineering professor and developer of the Flood Map Viewer stated: “flood depth may increase by up to 60 per cent.”⁴

Other Conservation Authorities on floodplain and climate:

- From Catarqui Conservation Authority regarding cut and fill: “**Compensation should be provided up to the 1:100-year floodplain elevation plus an additional factor for climate change related flood level increase (e.g. additional 10% cut volume per each slice.**”⁵
- From the City of Ottawa: “Projected changes suggest an increased risk of extreme riverine flooding which exceeds the current 1 in 100-year flood event.... **The 1 in 350-year flood event was selected as an appropriate event for assessing changes in riverine flooding due to climate change. [It] Aligns with local climate projection trends for climate parameters that influence riverine flooding [and] Is the Public Safety Canada recommended standard for creating flood hazard maps...** Mapping of the 1 in 350-year flood plain is completed by the Conservation Authorities in partnership with the City as part of an on-going flood plain mapping update program.... **The City’s new Official Plan defines a climate change flood vulnerable area as the area between the regulatory 1 in 100-year flood plain and the 1 in 350-year flood plain.** In the climate change flood vulnerable area: The Official Plan will require new development applications in these areas to assess riverine flood risks and include mitigation measures to reduce or avoid identified flood risks.”⁶

Additionally:

- From the Planning Act, section 2: “The Minister, the council of a municipality... and the Tribunal, shall have regard to... (h) the orderly development of **safe** and healthy communities... (p) the **appropriate location** of growth and development... (s)... and **adaptation to a changing climate.**”
- From Natural Resources Canada (NRC): “There is a growing widespread awareness that climate change considerations can be critical to incorporating hydrologic ... projections into floodplain maps.” NRC provides guidelines, as well as case studies to “advance climate change considerations in floodplain mapping by providing examples of methods used by early adopters.”⁷
- From a study reviewing 20 years of NASA data: “the proportion of the world’s population exposed to floods grew by 20 to 24 percent ... [which was] greater than what previous models predicted. ... The increase in exposure includes ... the reclassification of some lands in the wake of large flood events”⁸

Comment:

p.9

- **CALL TO ACTION:** Given the proximity of the proposed development to the floodplain, the risk of more extreme and increasingly frequent flood events must be considered in the floodplain mapping data and in the cut and fill process. **I urge the Town and RVCA to ensure the highest standards by: using LiDAR data that includes terrestrial laser scanning for greater accuracy; adding 10% cut volume per each slice to account for climate related flood increase; and treating the area between the 1 in 100-year flood plain and the 1 in 350-year flood plain as climate change flood vulnerable area.**

New Issue 6: Mitigate negative impacts of cut & fill

From 2024 PPS, 5.2:

- “2. Development shall generally be directed to areas outside of ... b) hazardous lands adjacent to river ... systems which are impacted by flooding hazards ... 3. Development and site alteration shall not be permitted within ... c) areas that would be rendered inaccessible to people and vehicles during times of flooding hazards”

From Witness Statement of Eric Lalande, Senior Planner at RVCA:

- “While it is generally understood that the application would necessitate the realignment of the floodplain through earthworks [cut and fill]... **Modification to natural hazards is not taken lightly, and... should be approached from a perspective of minimizing influence on natural processes, and not by maximizing development potential...** particularly where lands outside of a hazard are available.”

Comment:

- **CALL TO ACTION:** However, if the developer intends to bring all of these areas out of the floodplain by employing cut and fill, I urge the Town to ensure that the following are completed before any site alteration via cut and fill begins: detailed mapping of NHFs (New Issue 2); determination of net benefits (New Issue 3); and protection of endangered/threatened species (New Issue 4).

New Issue 7: Exclusion fencing for lots encroaching on NHF or floodplain

From Schedule A to Draft Plan Approval Decision:

- “62. The Owner shall construct exclusion fencing on any lot line that abuts a natural heritage, floodplain feature or designation or associated setback.”
- “31. The Owner shall install a 1.2 m high black vinyl chain link fence along the common property lines separating a lot or residential block from any adjacent environmental protection zone, floodplain overlay zone or stormwater management pond.”

Comments:

- Note: numerous lots—rather than abutting on—actually encroach into the Significant Woodland Setback and Provincially Significant Wetland Setback (both NHFs) and into the floodplain.

p.10

- Over 125 lots encroach partly or fully into the Significant Woodland Setback (see purple dotted line in Appendix 1), and over 45 lots encroach partly into the Provincially Significant Wetland Setback (see pink dotted line in Appendix 1).
- Currently, over 40 lots encroach partly or fully into the 100 year floodplain.
- **CALL TO ACTION: If the developer is determined to build within the setbacks of Natural Heritage Features (including the Significant Woodland Setback, Provincially Significant Wetland Setback, and the floodplain), I urge the Town to ensure that the developer provides the exclusion fencing they have agreed to. Note: this would necessitate that exclusion fencing break up lots and/or separate large areas from the rest of the development (see purple, pink, and yellow dotted lines in Appendix 1).**

New Issue 8: Inadequate vegetation compensation

From Schedule A to Draft Plan Approval Decision:

- “69. The Owner agrees to provide vegetation compensation and planting material in areas where the setback has been determined to be less than 30 m.”

From Witness Statement of Rob West, Senior Ecologist:

- “The EIS also suggests that there will be Significant Woodland losses onsite due to the proposed development: ‘However, incursions into the edge of Significant Woodland associated with the Grants Creek PSW will total 2.6 ha. This would be offset with the conversion of 3.6 ha of the low-quality thicket to be replanted with deciduous tree cover.’ ... **The above mentioned estimates do not take into account the 15 m Significant Woodland setback** ... Although these areas constitute Significant Woodland, they are also Significant Wildlife Habitat (SWH) and subject to other protection measures.”

Comments:

- The proposed compensation for the loss of Significant Woodland area fails to account for the setback area and the fact it is also Significant Wildlife Habitat.
- **CALL TO ACTION: Since condition 69 is extremely vague, I urge the Town to elaborate in condition 69 what adequate “vegetation compensation” would entail, including the ratio of the lost area (including setback area) to compensatory area, the type and quality of the compensatory planting, and what is being removed by the compensatory planting.** Further, I urge the Town to develop a tree preservation and compensation policy.⁹

UNRESOLVED FROM PREVIOUS ISSUES LIST

The following issues were detailed in my previously submitted Participant’s Statement and Addenda. Since they have not been rectified in the settlement files, they are included again below in this Updated Participant’s Statement.

ISSUE	RESPONSE	DESCRIPTION
<p>1) Do the applications have appropriate regard for matters of provincial interest as enumerated in section 2 of the Planning Act?</p>	<p>1.i) No.</p> <p>From section 2 of the Planning Act: (l) the protection of the financial and economic well-being of the Province and its municipalities;</p>	<p>From Tyler Bauman’s Witness Statement: “The costs associated with riverine flooding, which is the form of flooding depicted through floodplain mapping, is significant and increasing. Ontario is the second-highest flood-prone region in Canada, with an average annual loss of \$805.1 million. It is estimated that in Canada alone, annual flood costs could exceed US\$14 billion by 2050.”</p> <p>In 2022, the Ontario government provided \$5.5 million to small municipalities impacted by extreme weather events.¹⁰</p> <p>Canadian Climate Institute states: “more than 540,000 homes could be built in areas of flood hazard by 2030, resulting in up to \$2 billion every year in additional damages to housing in Canada from flooding alone.”¹¹</p> <p>Are the Province, the Town, and the County committed to spending millions to billions of dollars on flood costs in the coming years?</p>
<p>1) Do the applications have appropriate regard for matters of provincial interest as enumerated in section 2 of the Planning Act? <i>(continued)</i></p>	<p>1.iii) No.</p> <p>From section 2 of the Planning Act: (q) the promotion of development that is designed to be sustainable ... (s) the mitigation of greenhouse gas emissions ...</p>	<p>A report commissioned by the Doug Ford government, but never released publicly, “urges the government to strongly promote the adoption of electric heat pumps.”¹²</p> <p>From the federal Minister of Energy and Natural Resources, the Minister of Housing, Infrastructure and Communities: “new homes and buildings must be built with net-zero emissions in sight if we are to avoid having to retrofit them before 2050. ... to build ‘green’ from the start, meaning structures made in a way that is low-carbon, energy efficient, climate resilient and affordable.... developers and builders need to ensure their buildings minimize operational emissions and embodied carbon.”¹³</p> <p>Following the description in 1.ii) above, the documentation accompanying the proposal does not explain the approach to sustainability or greenhouse gas emissions.</p>
<p>1) Do the applications have appropriate regard for matters of provincial</p>	<p>1.v) No.</p>	<p>From Trevor Choffe’s Witness Statement: “it is my professional opinion that in order for the ingress and egress to the subdivision to be sufficient from an</p>

interest as enumerated in section 2 of the Planning Act? <i>(continued)</i>	From section 2 of the Planning Act: (o) the protection of public health and safety ;	emergency services perspective, a second, separate bridge access is required before any more than 100 units are occupied.”
1) Do the applications have appropriate regard for matters of provincial interest as enumerated in section 2 of the Planning Act? <i>(continued)</i>	1.vi) No. No. From section 2 of the Planning Act: (j) the adequate provision of a full range of housing, including affordable housing ;	Allocating a block for “affordable housing” does not meet the target of 25% of all new ownership or new rental housing to be affordable in the Town of Perth’s Official Plan.
4) Does the Application conform to the policies of the County of Lanark Sustainable Communities Official Plan (SCOP)?	4) No.	Also from Eric Lalande’s Witness Statement: “Lanark County Sustainable Official Plan ... 14.2. Development and site alteration is prohibited in flood plains ... 15. The Rideau Valley Conservation Authority generally does not permit new development within flooding hazards, specifically new dwellings within a floodplain.” Additionally, one of the SCOP’s strategic objectives is to “9.1 Anticipate and plan for changes in climate, the natural environment and the resulting impacts on ... municipal infrastructure.”
5) Does the Application conform to the policies, purpose and intent of the Town of Perth Official Plan?	5) No.	The Official Plan aims: “to set out specific targets for affordable housing; ... To conserve the attributes of the natural physical environment such as wetlands, wildlife communities, trees and vegetation ... ; To generally divert development away from ... flood plains ... unless it can be clearly demonstrated that the constraint can be safely overcome so as to not endanger property or the health or safety of occupants ... ; To keep the public informed and involved in making land use decisions ...” Furthermore, the Official Plan states: “planning applications will be expected to demonstrate how their development proposals have taken into account ... [climate] mitigation and adaptation, community sustainability, energy efficiency/conservation, energy production, landscaping/tree planting and environmental protection.”

		<p>However, the public continues to express significant concerns about the proposal. Perth Citizens for Sensible Development (PCSD), an ad hoc citizens’ group of which this Participant is a part, has hosted two public meetings each attended by over 200 people. PCSD also collected over 465 signatures on a paper petition, which was presented to the Town of Perth’s Committee of the Whole on February 11, 2025. The text of the petition—along with updated comments from PCSD—can be found in Appendix 4.</p>
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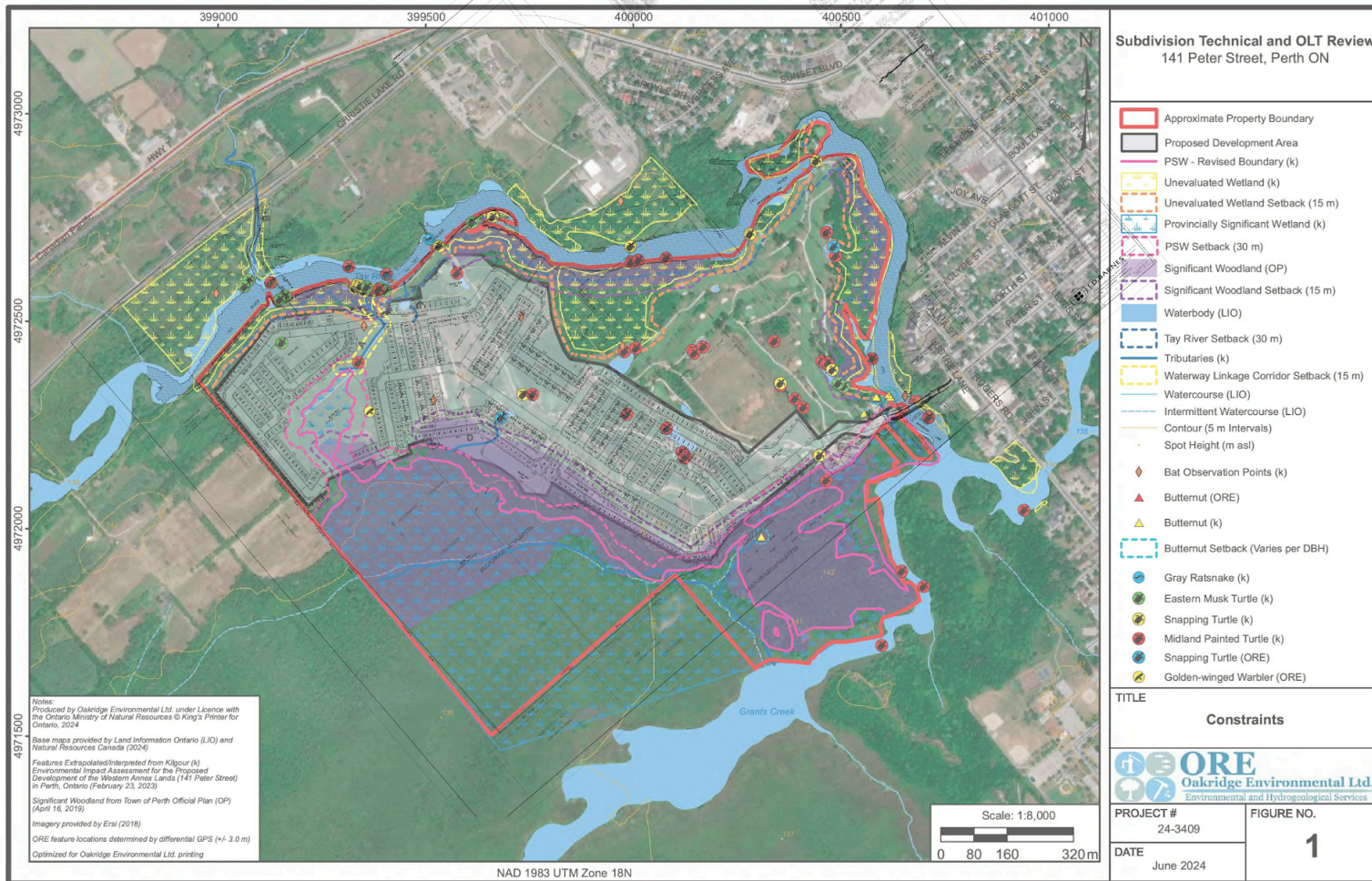
<p>12) Have the potential impacts of the Tay River and Grant’s Creek floodplains been adequately addressed for the proposed subdivision?</p>	<p>12) No.</p>	<p>See statement from Robert West above.</p>
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<p>14) Does the proposed draft plan of subdivision have appropriate regard for the matters and criteria to be addressed pursuant to s. 51(24) of the Planning Act?</p>	<p>14) No. From 51(24) of the Planning Act: (24) 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, (c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;</p>	<p>See all Descriptions above. In addition, the Insurance Bureau of Canada “estimates that anywhere from six to 10 per cent of Canadian homes are currently uninsurable due to flooding and that estimate could go up as more insurance companies update their risk assessments to account for the rising threat of climate change.”¹⁴ The City of Ottawa states “In 2017 flood levels on the Ottawa River reached the 1 in 50-year flood event, and in 2019, the flood levels approached the 1 in 100-year event. ... Projected changes suggest an increased risk of extreme riverine flooding which exceeds the current 1 in 100-year flood event.”¹⁵ Finally, the Town’s Official Plan aims “to ensure safe development from natural and human-made hazards as impacted by climate change.” This has not been clearly addressed in the proposal.</p>
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(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**;
(h) conservation of **natural resources and flood control**

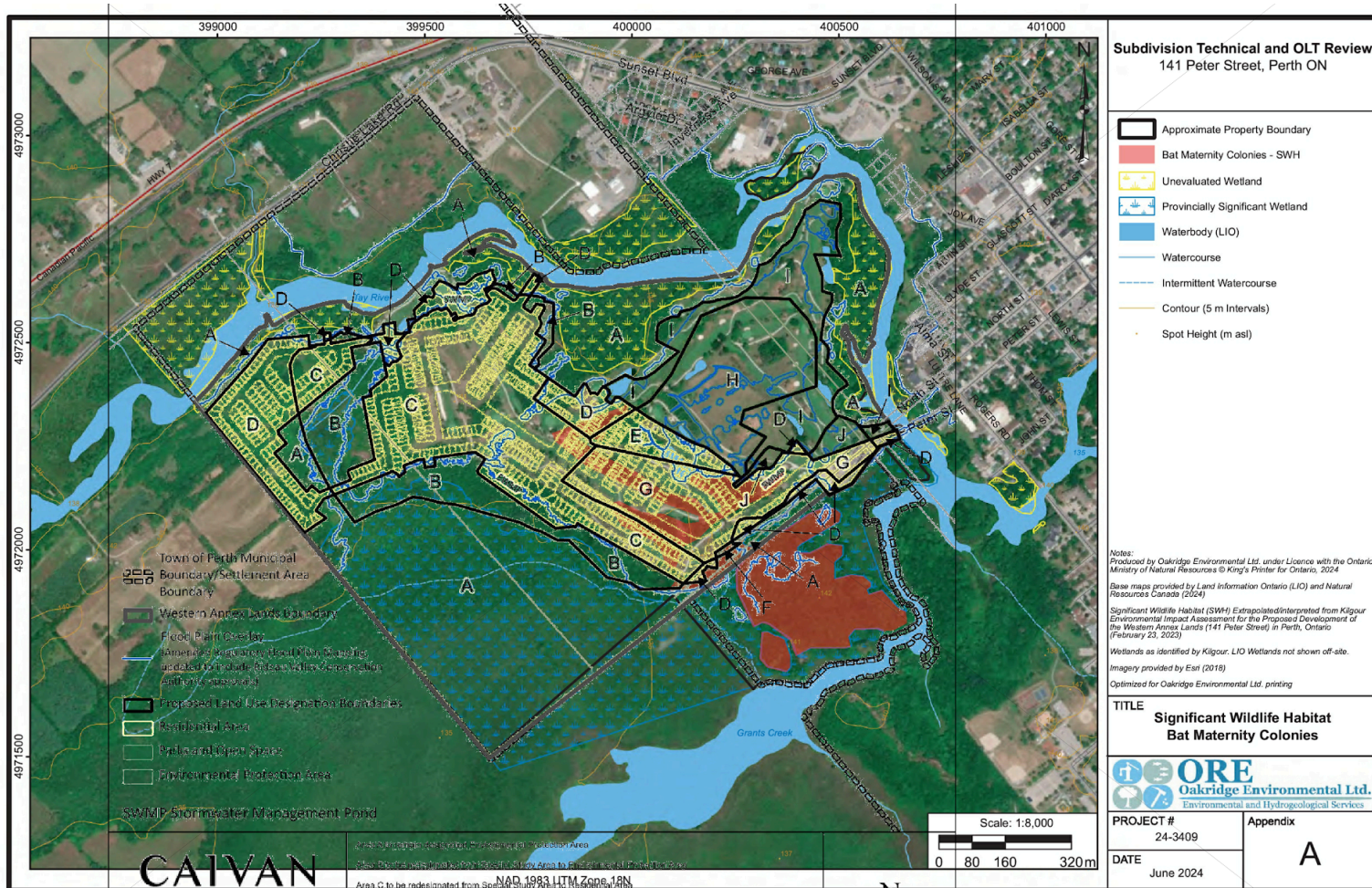
APPENDIX 1: Draft Plan & Map with NHF Setbacks

Draft Plan from February 2026 overlaid on map showing NHF setbacks (from Rob West's Witness Statement).



APPENDIX 2: Schedule B & Map with Bat Colonies

Schedule B from February 2026 overlaid on map showing bat maternity colonies (from Rob West's Witness Statement).

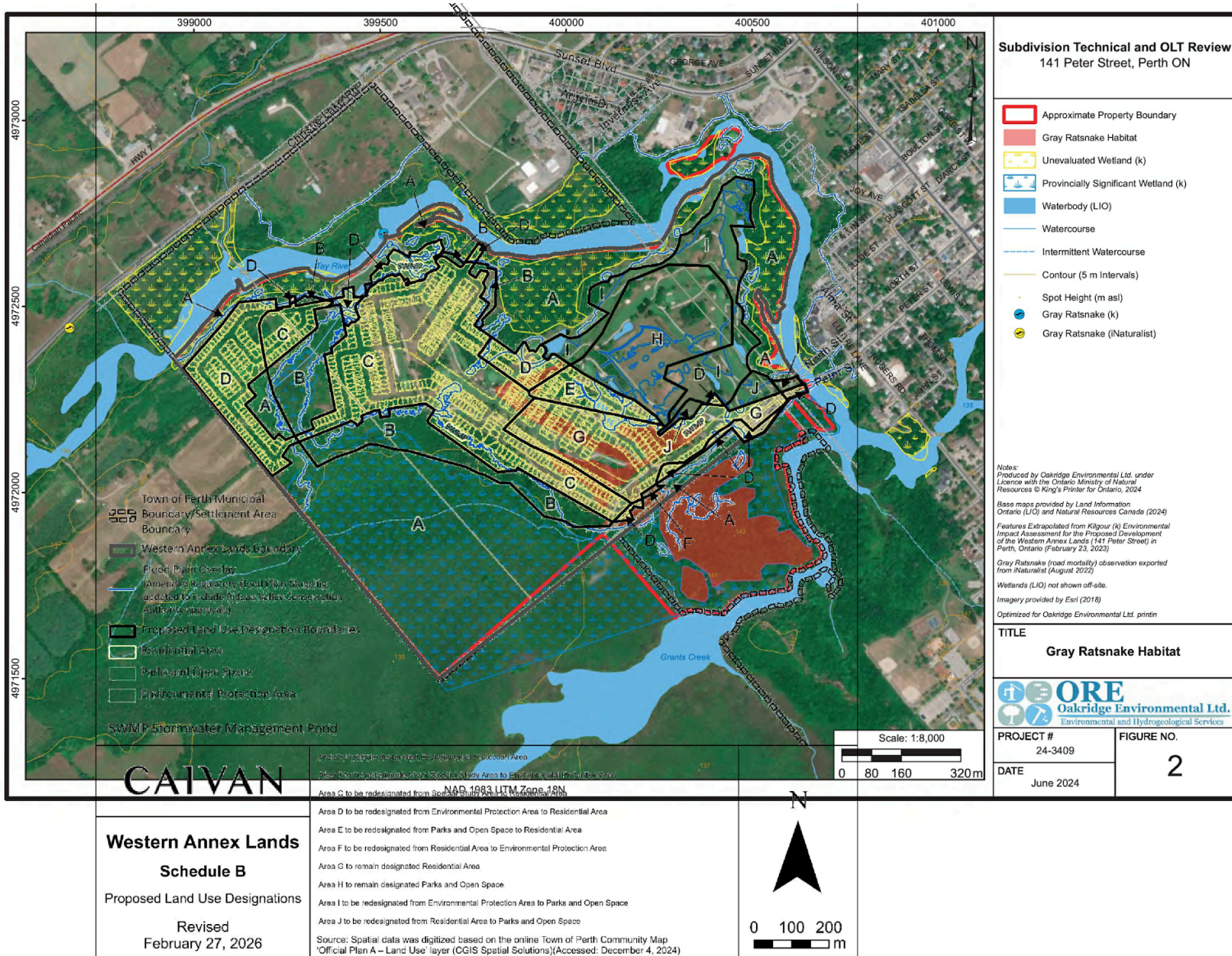


<p>Western Annex Lands Schedule B Proposed Land Use Designations Revised February 27, 2026</p>	<p>Area D to be redesignated from Environmental Protection Area to Residential Area Area E to be redesignated from Parks and Open Space to Residential Area Area F to be redesignated from Residential Area to Environmental Protection Area Area G to remain designated Residential Area Area H to remain designated Parks and Open Space Area I to be redesignated from Environmental Protection Area to Parks and Open Space Area J to be redesignated from Residential Area to Parks and Open Space</p>
	<p>Source: Spatial data was digitized based on the online Town of Perth Community Map 'Official Plan A – Land Use' layer (GIS Spatial Solutions)(Accessed: December 4, 2024)</p>



APPENDIX 3: Schedule B & Map with Gray Ratsnake

Schedule B from February 2026 overlaid on map showing gray ratsnake habitat (from Rob West's Witness Statement).



APPENDIX 4: Petition Text & Comments

PETITION – FEBRUARY 2025 Signed on paper by over 465 citizens. Preamble: “We the undersigned residents of Perth and Lanark County insist that our municipal government representatives agree to the proposed residential development of the Perth Golf Course by CAIVAN Ltd ONLY if and when the following conditions are met”	Comments re: Settlement documents – May 2026
1. An access to the north is created from the outset of development and used as the primary access for all construction and residential traffic.	Not met: There is NO firm plan for a second crossing. Instead the plan allows 200 homes to be built without a second crossing, so all construction traffic in phase one will seriously disrupt residential neighborhoods (via the Peter Street bridge).
2. The total number of housing units is no more than 650 units as stated in the town's existing infrastructure master plan.	Not met: The developer plans to build 200 homes in phase one. In the draft plan, there are over 600 lots with multiple lots being triplexes as well as blocks for stacked housing. The total number of units is not currently stated.
3. 25% of the development is affordable housing, as stated in the town's official plan.	Not met: The developer is not building any affordable housing.
4. Development is not permitted within the 100 year floodzone.	Not met: On the draft plan, parts of the stormwater management blocks and numerous lots are still within the 100 year floodplain.
5. The front nine golf course is permanently retained as a golf course or open space.	Met.
6. Retain existing environmental protection areas identified in the town's official plan.	Not met: There are still areas in the draft plan that encroach in the 100 year floodplain and in the Provincially Significant Wetland setback.

7. The development includes provisions for the homes to be net-zero ready.	Not met: There is no attempt to address net zero.
8. Introduction of a phased approach to manage demand on infrastructure, recognizing other development opportunities within the town.	Not met: Construction, vehicular traffic, road conditions, and pedestrian safety concerns are not addressed.
9. Plans are revised to provide a more complete community design approach and meet the developer's commitments to an integrated, walkable and cyclable community.	Not met: The developer has given no commitments for an integrated, walkable and cyclable community.

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3. <https://floodmapviewer.com/maps>
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6. <https://ottawa.ca/en/planning-development-and-construction/maps-and-zoning/flood-plain-mapping-and-climate-change#>
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8. <https://earthobservatory.nasa.gov/images/148866/research-shows-more-people-living-in-floodplains>
9. <https://www.georgina.ca/sites/default/files/2025-11/2025-tree-preservation-policy-final.pdf>
10. <https://news.ontario.ca/en/backgrounder/1002868/ontario-supporting-communities-affected-by-extreme-weather>
11. <https://climateinstitute.ca/reports/close-to-home/>
12. <https://thenarwhal.ca/ontario-energy-report-natural-gas/>
13. <https://natural-resources.canada.ca/transparency/reporting-and-accountability/plans-and-performance-reports/departmental-strategies/the-canada-green-buildings-strategy-transforming-canadas-buildings-sector-for-net-zero/26065>
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p.20

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