

June 27, 2025

CRCA File: MV/RID/167/2024

**Sent by e-mail**

Foster Elliott  
Associate Planner  
Township of Rideau Lakes  
[felliott@rideaulakes.ca](mailto:felliott@rideaulakes.ca)

Dear Mr. Elliott:

**Re: Applications for Minor Variance A-14-2024 & Site Plan Control SP-26-2024  
(Revised)  
Lot 21, Concession 8, Indian Lake Road  
Ward of South Crosby, Township of Rideau Lakes  
Waterbody: Indian Lake**

Cataraqui Conservation (CRCA) staff have reviewed the above-noted applications and provide the following comments for the Township's consideration.

Summary of Proposal

The applicant is proposing to construct a 72.5 sq. m 1-storey dwelling with a loft and an attached uncovered entrance deck and an attached uncovered entrance side deck with associated stairs and a rear uncovered entry landing. The new dwelling is proposed to be serviced by a new sewage holding tank. The applicant seeking relief from the Township of Rideau Lakes Zoning By-law to reduce the required minimum water setback and reduce the minimum rear yard setback and road centreline setback.

Discussion

CRCA has been involved extensively in the review of the proposed development at this property dating back to 2013 and in more recent years through consultation with the current owners on the subject minor variance. Up until January 1, 2024 CRCA's review included a broad range of environmental matters including natural heritage, water quality and natural hazards. Following the passing of Bill 23 CRCA's scope of review was limited

to natural hazards matters only. CRCA provided preliminary comments dated July 11, 2024. These comments provided considerations for the Township's review which in our opinion have been addressed in the revised submission.

Post Bill 23, CRCA's main interests with respect to this application are the avoidance of natural hazards (e.g. flooding and erosion) associated with the shoreline of Indian Lake and the protection of the hydrological function of wetlands. Cataraqui Conservation, through our implementation of Ontario Regulation 41/24 and, in accordance with the natural hazards policies of the 2024 Provincial Planning Statement (PPS), directs development away from lands subject to natural hazards, such as flooding and erosion. CRCA defers any comments as they relate to natural heritage to the Township of Rideau Lakes and their peer review of the application.

### *Flooding*

The regulatory floodplain for the Rideau Canal system is the maximum recorded water level. This level is recorded as 122.39 m geodetic for Indian Lake. The regulatory floodplain extends inland from the shoreline onto the subject property. CRCA policies generally requires new development be setback a minimum of 6 metres from the floodplain but includes permissions for development on constrained lots where it is not feasible to achieve this setback. The subject property is a constrained lot as it is entirely located within 15 m of the floodplain and there is insufficient area to locate a building envelope out of the 6 m setback from the floodplain. The proposed dwelling and sewage holding tank are located outside of the regulatory floodplain in an area of least and acceptable risk on the constrained lot. The dwelling and sewage holding tank will be required to be elevated and floodproofed to the maximum extent and level in accordance with Appendix H (attached). The lowest finished first floor (including basements and crawl spaces) and the holding tank riser pipe will be required to have a minimum elevation of 122.99 metres geodetic. These design details will be confirmed through the CRCA permit approval process should the minor variance be granted.

### *Erosion*

The CRCA defines the extent of potential erosion hazard for bedrock shorelines to be a stable slope allowance of 1(h):1(v), plus an erosion allowance of 6 metres. For till shorelines the stable slope is defined as 3(h):1(v) plus an erosion allowance of 6 metres. For constrained lots with shoreline heights below 3 metres in height, a reduction of the erosion allowance to 4 metres is considered. The shoreline examined immediately in front of the proposed building envelope contained a till shoreline, approximately 1.5 metres in height. The extent of the erosion hazard in this location would therefore be

approximately 8.5 to 10.5 metres from the toe of slope. The proposed setback of 9.6 m (31' 6") is supported under CRCA's policies.

### *Wetlands*

The subject property is adjacent to Benson Mosquito Loon Provincially Significant Wetland (PSW) on the north side of Indian Lake Road and unevaluated wetlands to the south in Indian Lake. CRCA's primary focus is ensuring new development and site alteration do not impact the hydrologic function of wetlands. These functions include flood attenuation and shoreline erosion control. CRCA policies generally require a minimum setback of 30 m from all wetlands. The 30 m setback is maintained from the Benson Mosquito Loon PSW to the north. The proposed development is located a minimum of 7 metres (23 ft.) from the unevaluated wetlands to the south. CRCA policies can permit new development within 30 m of a wetland if there are no reasonable alternatives for locating the building outside of the 30 metre setback and if the interference on the hydrologic function of the wetland has been deemed to be acceptable by CRCA.

The proposed dwelling has been laid out to achieve the maximum setback from the wetlands. The proposed dwelling is not anticipated to have a direct impact on the hydrologic function of the wetlands. However, alteration of lands adjacent to a wetland can have indirect impacts on wetlands. For this reason, it is important that the portion of the property between the dwelling and the waters edge be maintained in a healthy naturalized state. Other protection measures include proper control of runoff (directing stormwater away from the wetland) and using erosion and sediment controls during construction.

**To ensure long-term erosion avoidance and slope stability as well as to minimize impacts on the hydrologic function of wetlands, staff recommend the maintenance and enhancement of a healthy buffer of native vegetation between buildings/structures and the water, to help stabilize soils into the long-term. Runoff from buildings and structures and other hardened surfaces should also be directed away from the shoreline to a naturally vegetated location where infiltration can occur. Property erosion and sediment controls (e.g. silt fencing, fibre roll etc.) should be utilized during construction. Any additional protection or mitigation measures recommended in the Environmental Impact Assessment should also be adhered to in order to protect the integrity of wetlands.**

### Recommendation

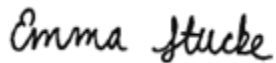
CRCA staff have no objection to the approval of applications A-14-2024 and SP-26-2024 based on our review of natural hazards. We recommend that the above noted best practices measures (in bold) are included in the site plan agreement.

### Regulatory Requirements

Please note that the subject lands are subject to Ontario Regulation 41/24: *Prohibited Activities, Exemptions and Permits* which is administered by the CRCA. The purpose of the regulation is to ensure that proposed changes (e.g. development and site alteration) to a property are not affected by natural hazards, such as flooding and erosion, and that the changes do not put other properties at greater risk from these hazards. For this property, any development (buildings and structures) and site alteration (excavation, grading, placement of fill) on the property is subject to O. Reg. 41/24. **A permit will be required for the proposed dwelling and sewage holding tank as well as any other development or site alteration on the property.**

Please inform our offices of any decision made by the Township with regard to this application. If you have any questions, please contact Emma Stucke at 613-546-4228 ext. 239, or by e-mail at [estucke@crca.ca](mailto:estucke@crca.ca).

Sincerely,



Emma Stucke, MCIP, RPP  
Resource Planner  
Cataraqui Conservation

Cc: Susan Millar, Parks Canada, via email