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Date: May 21, 2025  
Subject: Planning Justification Report Addendum Letter

Dear Angela Buonamici,

On May 24, 2024, Arcadis Professional Services Inc. (“Arcadis”) submitted a Planning Justification Report to Prince Edward County (the “County”) on behalf of Blanding Inc. (the “applicant”) in support of an Official Plan Amendment (“OPA”), Zoning By-law Amendment (“ZBLA”), and Site Plan Control (“SPC”) application (Prince Edward County Applications OPA-02-23 & Z12-24) for the property municipally known as 89 Sandy Lane and 4 County Road 18 in Prince Edward County, also known as Lakecroft (“subject site” or “site”).

While the overall findings of the Planning Justification Report (“PJR”) still apply, all instances where the report discusses the existing and proposed uses shall be amended: “nine (9) glamping tent accommodations, one (1) three (3) bedroom cottage accommodation and one (1) existing motel with five (5) suites for overnight stays, as well as a purpose-built event venue for the hosting of weddings, corporate retreats, and gatherings at Lakecroft. The development also includes washrooms, office, and storage structures accessory to the operations.” The previously included shelter tent is no longer proposed and is instead replaced by the purpose-built event venue building.

Furthermore, the Planning Justification Report is to be amended with respect to process and the application type. The original Planning Justification Report submitted to the County proposes a SPC application for the existing conditions in tandem with an OPA and ZBLA, and an additional future SPC application for the proposed uses.

This addendum letter has been prepared to address the comments received by Prince Edward County on July 29, 2024, which states:

*“Please be advised that since the motel and event space are currently being used, the Site Plan application and Zoning By-law Amendment application will need to run concurrently. Please ensure that the Site Plan includes the final build out of the site.”*

As a result of this comment and the intent to streamline the process, the proposal is now to proceed with the Official Plan Amendment and Zoning By-law Amendment concurrently with the Site Plan Application, which will address both existing and proposed future uses. The updated Site Plan included within this submission has been amended to include all current and final building iterations for the site.

## Policy Additions

### A) Design

Per the staff comments provided by Prince Edward County on July 29, 2024, additional policy justification related to design was requested:

**“Policy 4.1.4 (9) should be reviewed and discussed regarding the Design Policies.”**

**“Appendix C - Design Policies are required to be followed for new development (Commercial Policies, Design Policies for Tourism Corridors, etc.)”**

Policy 4.1.4 (9) in the Official Plan states *“All new development shall conform to the Design Policies for Villages and Hamlets in Appendix C to this Plan.”* The following sections respond to the design policies found in Appendix C – Design Policies of the County of Prince Edward’s Official Plan.

#### Appendix C.1 Design Policies for Villages and Hamlets

Policy C.1 - **Design Policies for Villages and Hamlets** discusses key areas of focus in the County for design elements. Per the **Pattern of Development** policies:

- a) *In accordance with the policies for Villages and Hamlets, future development will contribute to a compact built form, where possible and appropriate. To support a compact built form, new development shall generally occur incrementally as infilling within or contiguous to the existing built-up areas.*
- b) *To further support a compact built form in Villages and Hamlets, natural heritage features shall be maintained as a buffer between Villages and Hamlets and the abutting Rural Lands and Agricultural Areas.*
- c) *To support the development of walkable Village and Hamlet centres that offer a concentration of goods, services and amenities, non-residential uses will be directed to locate adjacent to, or in proximity to existing commercial and institutional uses.*
- f) *Council shall encourage the protection of public views and sightlines to significant cultural heritage resources.*

The proposed development collocates several tourist commercial uses on one site, combining short term accommodations with the proposed venue space, while protecting the existing natural features. In providing accommodation in tandem with the event venue, the proposed development offers a concentration of services and amenities on the site, as well as a compact built form. The site preserves the natural features on the site by leaving the wetland untouched and developing the site around the natural features. The proposed development incorporates commercial uses with the existing natural landscape features the County has to offer, as well as offering sufficient buffer to the adjacent Environmental Protection Area and Agricultural Area further to the northeast.

Per the **Infill Development** policies:

- g) *Infill development that is compatible with existing development is essential to the revitalization of Villages and Hamlets. Appropriate infill development in Villages and Hamlets may include:*
  - i. *Infill on vacant or underutilized sites;*
  - ii. *Regeneration of dysfunctional, condemned, or incompatible developments; and,*
  - iii. *Adaptive-reuse and/or additions to existing buildings.*

- h) Residential and commercial infilling, as well as renovations and additions to existing buildings, shall be a visual and economic asset. It shall be compatible with existing development.*

The proposed development is a form of commercial infill development on a large, under-utilized lot within the Hamlet of Cherry Valley. The proposed introduction of an event venue is a compatible form of commercial development and represents an appropriate transition of the property's former use as a recreational trailer park. The property has undergone significant clean-up and revitalization in an effort to better respect its natural context. Further, the proposed commercial building represents an economic asset to the community by providing opportunities for jobs and tourism.

Per the **Commercial Buildings** policies:

- k) Design for new commercial buildings in the Villages and Hamlets shall have regard for the following objectives:*
- i. Primary pedestrian entrances are barrier-free and provide direct access to a public sidewalk or, where there is no sidewalk, the public right-of-way;*
  - ii. A textured architectural quality is achieved by introducing variation in key elements of the façade, including bay windows, cornices, window trim, entrances, canopies and the articulation of the building mass;*
  - v. Parking is not located in the front yard of any building;*
  - vi. Buildings and their parking/storage areas are buffered from adjacent residential uses;*
  - vii. Any visible mechanical equipment is appropriately screened and located in a manner that has a minimal physical and visual impact on adjacent rights of way or public park spaces; and*
  - viii. Where feasible, all transformers and other above ground utilities are located within the building, or on private property located away, and/or screened, from public view.*

Pedestrian access to the site is provided from County Road 18 and southern parking areas. Golf carts and mobility aids will also be available to facilitate mobility throughout the property. The vast majority of parking spaces are located behind the primary entrance to the site, screened from view from the public realm and buffered from surrounding residential uses by a combination of existing vegetation and additional future plantings.

New development on the site is setback from the roadway and oriented towards the waterfront. The development also comprises both permanent and semi-permanent structures disbursed throughout the site, providing a variety of architectural forms integrated within a natural landscape. The new building for the proposed event venue use has been designed in a context-sensitive manner and is oriented towards the centre of the property, away from surrounding residential uses. Due to the natural context of the site, the proposed uses are well-screened from surrounding properties and the public realm, while still offering important economic contributions to the community, in a context-sensitive manner.

Finally, Official Plan Section C.1 sets out **Design Guidelines**, including the following applicable policies related to Villages and Hamlets:

- p) The County may prepare Village or Hamlet Specific Design and Development Guidelines that reflect the unique characteristics of each Village, to ensure that the intent of the policies of this Plan is achieved. These Village or Hamlet Specific Design and Development Guidelines may consider the following key elements:*
- i. Neighbourhood structure and layout, including: green infrastructure (Natural Heritage System and Open Space Lands); natural connections and corridors; tree and landform conservation; stormwater management; neighbourhood activity centres (community and commercial uses);*

- street, pathway, and trails network and connections; development block dimensions; school location and dimensions; and park type location and dimensions;*
- ii. Site design and building orientation, including: orientation to the street; prevailing setbacks; prevailing lotting and grading; orientation to reduce shadows, improve privacy, and increase solar gain; tree and landscape conservation;*
  - iii. Built form, height, and massing, including: building height and local context; separation distance and window offsetting; outdoor amenity views/privacy; visual stepbacks to reduce building mass and reduce shadows; transition from taller to shorter buildings; and the introduction of angular planes;*
  - iv. Building articulation and detailing, including: architectural style; preferred finishing materials; accesses and entrances; façade design; windows; roofs, gables, and dormers; porches and building projections; heritage building alterations/additions; parking and garage location/design; and screening of parking and service areas/utilities;*
  - vi. Community and commercial uses, including: site design and building orientation; built form, height, and massing; building articulation and detailing; parking location and design; and pathway and trail connections; and*
  - vii. Greenspaces, including: accessible frontages and views from neighbourhood; landscape buffers around natural features/stormwater facilities; community gardens; and pathway and lighting design.*
  - viii. Crime Prevention through Environmental Design, such as design approaches for natural surveillance, access control, and territoriality.*

Much of the proposed development is oriented away from the main road and is strategically situated to avoid environmentally sensitive features on the site. There are no alterations to the streetscape as the existing building fronting on to County Road 18 will be retained and renovations limited to the interior, respecting the existing surrounding context. The proposed development integrates permanent, semi-permanent and green infrastructure all into a cohesive design. Additionally, the materials and finishes used are aligned with other resort and tourist areas within the County to fit the surrounding character and context of the Hamlet designation.

The proposed development incorporates existing buildings and natural features present on the site, as well as glamping tents and a new event venue building. The proposed development enhances the natural character on the site, providing minimal permanent interventions for the natural surroundings to remain prominent. The existing provincially significant wetland will be protected, the majority of the existing trees (including all Butternut trees) will be retained, and addition of further plantings are proposed to support the existing natural features of the site. Low impact development options are proposed for parking areas with GrassProtectA mesh, as well as for roadways, and walkways with GravelPave2. GravelPave2 provides an accessible and low impact landscape treatment, compliant with accessible design standards. These options allow for porous and naturalized landscaping options, reducing the impact of impervious surfaces on the natural features present on the site.

## **Appendix C.4 Tourism Corridors**

Policy C.4 discusses design policies for Tourism Corridors. The following are the pertinent design policies for Tourism Corridor lands:

- a) The visual impact of development is an important consideration in maintaining the character of Tourism Corridors. Disturbance on lots will be limited and minimized and the maximum amount of vegetation is to be retained on a lot. Vegetation will be maintained within a viewscape and along ridgelines. Additional natural buffering or screening may be, as required, provided to supplement existing vegetation along the corridor. Design for new development in Tourism Corridors shall have regard for the following objectives:*

- i. The built form is blended into the natural landscape, with buildings and structures that maintain a low profile;*
- ii. Prominent buildings may be considered for resort commercial development if they are designed as landmarks and are in keeping with the building style and environment of the surrounding area;*
- iii. In a new development that would require the creation of lots, such as a cluster development, lot sizes respond to the natural landscape, and topographic features;*
- iv. Rock faces, steep slopes and vistas are preserved and vegetation is maintained within viewscapes and along ridge lines;*
- v. Native species are used for planted buffers and where vegetation is being restored;*
- vi. Building mass and coverage are limited in relation to the size and frontage of the property and are in keeping with the character of the surrounding area;*
- vii. Lot lines follow existing features and terrain, and are configured so as to minimize conflicts between abutting properties; and,*
- viii. Setbacks from roads are sufficient to provide and maintain a natural buffer between the development and the road, in order to maintain a vegetative character along the roads; however, the appropriate waterfront setback takes precedence when a lot has insufficient depth to provide a buffer at both the shoreline and the road.*

The proposed development retains and conserves the natural features on the site with minimal site intervention within these areas, as well as sensitive integration of both permanent and semi-permanent structures. The design of these structures allows for a low profile that is minimally impactful to the natural landscape. New structures are situated internally within the site, within minimal impact on views from surrounding properties or from County Road 18. The proposed development utilizes a low lot coverage of built versus unbuilt components, leaving a large portion of the site naturalized. Existing trees on site will be retained and new native trees planted along the shoreline, as well as planting strips to screen parking from surrounding residential properties.

Per the **Access** policies:

- b) Primary access for new residential and commercial development in the Tourism Corridors designation shall only be from a public road.*
- c) Limited development on existing lots of record and infilling lots may be permitted on an existing private road provided that no further extension of the private road is required, and that the existing private road has the capacity for additional traffic.*
- d) The use of paired driveways is encouraged in the Tourism Corridors designation in order to reduce the number of private, individual entrance requirements.*

The proposed development will continue to be accessed from County Road 18, a designated Tourism Corridor. The site currently features two entrances to the site, for the boutique motel and the glamping tent areas, which is necessary due to the site topography.

## **B) Tourism & Economic Development**

In addition to specific design-related policies, the Planning Justification Report is further amended to include additional overall policy support for the proposed development's contributions to tourism and economic development within Prince Edward County.

**Section 2.4.2 Objectives of the Official Plan** sets out various objectives to support Growth Management in the County, including promoting a full range of appropriate forms of development throughout the County, accommodating an appropriate range and mix of employment uses including tourism and rural uses to meet long-term needs of residents, businesses and the tourism industry, and promoting development standards and land use patterns that will sustain the financial, social, cultural and environmental well-being of the County over the long term, among others. **Section 2.5 (a)** states that “[t]his Plan accommodates growth in various locations throughout the County... Villages and Hamlets will also play a key role in accommodating new growth, in concert with their ability to provide context appropriate levels of infrastructure, whether municipal, communal or individual servicing systems/facilities”.

**Section 2.5 (b)** states that:

- b) *When reviewing development proposals within the Urban and Rural Settlement Areas, the County will consider the following criteria:*
- i. *New development shall be compatible with the local context;*
  - ii. *New development shall occur in proximity to existing development and shall have a mix of uses and densities that allow for the efficient use of infrastructure service systems/facilities that are appropriate for the local context;*
  - iii. *The County shall ensure the orderly progression of growth within the Urban and Rural Settlement Area boundaries and shall link the approval of new development to the protection of the Natural Heritage System, the conservation of Cultural Heritage Resources and timely provision of the appropriate infrastructure systems/facilities;*

The proposed event venue supports the County’s tourism, social and cultural objectives, and represents an appropriate use for the Hamlet and Tourism Corridor designations as sufficient servicing is provided, the development is context-appropriate, and provides an appropriate mix of uses for the efficient use of infrastructure. The Hamlet designation is an appropriate area to prioritize new economic growth and development in the form of an event venue, while protecting and preserving the surrounding natural environment.

**Section 3.2 Economic Prosperity** sets out the need for economic development as fundamental to the County’s future success and sustainability. Notably, **Section 3.2.1 Intent** confirms that “[t]he rural economy provides linkages between the County’s cultural and agricultural assets to be leveraged for growth, such as museums, special event venues, galleries, artist studios, and more. The intent of this Plan is to ensure the Municipality’s local economy will provide meaningful employment opportunities for residents, and place emphasis on protecting and enhancing agriculture and tourism’s role in the County’s economy while also diversifying the local economy by encouraging the growth of knowledge-based businesses, technology-based businesses, and multi-sector entrepreneurship”.

**Section 3.2.2 Objectives** outlines that economic development-related objectives including: “protect the high quality of place experience in the County as a driver of economic development; continue to enhance tourism’s role in providing employment opportunities within the County’s economy; encourage and promote new commercial development and cultural attractions along Main Streets in Settlement Areas to enhance the quality of place, vibrancy, and aesthetic appeal of the County; and, encourage the growth of small and medium sized commercial and industrial businesses, which comprise the majority of employers in the County”.

Located within the Cherry Valley Settlement Area and along the County Road 18 Municipal Tourism Corridor, the proposed conversion of a former trailer park to an event venue use with available on-site accommodations is an appropriate and supported contribution to the economy of the County's rural settlement areas and contributes to the economic prosperity objectives of the Official Plan.

**Section 3.2.3 Economic Development Policies subsection (3) Tourism** states that “[t]he County shall recognize and promote recreation-based tourism opportunities in the following areas shown on Schedules F-1 and F-2: Recreation & Tourism”, which includes Tourism Corridors. The site is situated on County Road 18, which is a municipal Tourism Corridor per the applicable schedules of the OP. The OP states that “[t]ourism opportunities shall also be encouraged, supported and permitted in other land use designations as long as they satisfy the intent of the designation” (**s.3.2.3(4)**). **Section 3.2.3 (7)** states that “[d]eveloping new or expanding linkages between the County's cultural and agricultural assets, such as museums, special event venues, galleries, artist studios, vineyards, and agri-tourism related businesses will be encouraged and promoted in support of their potential for economic growth within the Municipality.”

The site is situated on County Road 18 which is a designated Tourism Corridor. The proposed event venue use is directly supported and encouraged by the Tourism Corridors' policies related to economic development and economic growth of the County.

## Noise Impact Study

In order to address comments received by two residents who addressed concerns related to noise produced by the proposed event venue at the Statutory Public meeting, the Owners have elected to voluntarily retain the services of a qualified professional to prepare a Noise Impact Study to analyze anticipated impacts of the venue and proposed mitigation measures. The Noise Impact Study (NIS) was prepared by Cambium Inc., dated May 2025.

The Noise Impact Study assessed three specific noise sources of concern: amplified music in the proposed event building, amplified music or speaking on the attached patio area north of the building, and crowd related noise at the venue. These noise sources, while not officially considered stationary noise sources, were assessed through the NPC-300 stationary noise source methodology to provide further information and analysis of the potential impacts of the proposed development, as well as measures to mitigate them.

As the proposed development includes a new, well-sealed building, noise impacts will be well contained, particularly in comparison to other rural venues of a similar nature. A maximum of 87 dBA sound pressure from an amplified music source should be used in the event building when the doors remain open for a reception. This maximum can increase to 93 dBA when the building doors are closed. Additional doors at the west and northeast of the building should also remain closed during a reception. Furthermore, a sound meter is recommended to enforce the south level limit. Sound level records from the meter should be maintained on site.

Based on the analysis conducted and the mitigation measures proposed, Cambium's NIS affirms that the proposed development can be operated in accordance with the local noise by-law and provincial noise guidelines. Note that the local noise bylaw is subjective, so complaints may still be possible, however they are unlikely given the limits of NPC-300 are intended to address most negative effects of noise impacts.

Angela Buonamici  
The Corporation of the County of Prince Edward  
May 21, 2025

## Conclusion

The above amendments to the Planning Justification Report further enhance the justification that the proposed development, including associated OPA, ZBLA and SPC applications, seek to protect and preserve the natural features on the site, while adhering to the pertinent design requirements for Hamlets, Shore Lands, and Tourist Corridors. Furthermore, the proposed development is consistent with the design guidelines within the County of Prince Edward Official Plan.

Arcadis and the Applicant look forward to the opportunity to work collaboratively with the County of Prince Edward and all other relevant agencies, stakeholders, and the public with regards to this submission.

Sincerely,  
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