



Rideau Canal
National Historic Site of Canada
34 Beckwith Street South
Smiths Falls, ON K7A 2A8

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Elaine Mallory, Planner
Planning, Building and Licensing Services
United Counties of Leeds and Grenville
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**Subject: Plan of Subdivision Application 07-T-20252
819 County Road 23, Burritts Rapids
Village of Merrickville-Wolford**

Elaine,

Parks Canada appreciates the opportunity to provide feedback on the plan of subdivision application submitted to the United Counties of Leeds and Grenville for the proposed redevelopment of 819 County Road 23, located on lands contiguous to the Rideau Canal National Historic Site and UNESCO World Heritage Site in the Village of Merrickville-Wolford near Burritts Rapids.

The subdivision application will create 29 lots for single detached residential dwellings, including one lot for an existing dwelling. Another lot will contain an existing accessory building to be converted for residential use, as well as two park blocks, one providing communal water access.

As you know, the Rideau Canal National Historic Site of Canada, Canadian Heritage River and UNESCO World Heritage Site, is administered by Parks Canada to protect the cultural, natural and scenic values so that all Canadians can enjoy this legacy into the future. All parties have a responsibility to ensure the stewardship and conservation of this internationally recognized waterway.

Rideau Canal National Historic Site and UNESCO World Heritage Site

As previously noted, the subject property is located contiguous to the Rideau Canal with lands within the 30m buffer zone of the UNESCO World Heritage site. The proposed development does



not have a direct impact on the heritage resources of the canal or on the Outstanding Universal Value of the world heritage site.

The development does, however, fall within sight of the Rideau Canal and analysis of any impact of the development on the scenic values of the Rideau Canal should be considered.

The Rideau Canal was first recognized of national historic significance in 1925 in part for the unique historical environment of the canal system. There are historic values of the Canal system and its environment that extend beyond the administered Canal lands and waters. Applicable to the subject area, the following identifies associated lands of particular importance to the values of the Rideau Canal: “the views from the Canal and Canal lands to the heritage shore-lands and communities between Becketts Landing and Kilmarnock lockstation.” (Commemorative Integrity Statement, 2000)

In addition, when the Rideau Canal was inscribed on the World Heritage List in 2007, the World Heritage Committee addressed requirements for protection and management by recognizing a 30 metre buffer zone surrounding the inscribed property and recommended that consideration be given to strengthening the canal’s visual protection outside the buffer zone, in order to ensure that the visual values of the setting are protected. In this sector of the Canal the buffer zone extends back from the high water mark of the Rideau River. Per the *Operational Guidelines for the Implementation of the World Heritage Convention*, effective management of a world heritage site goes beyond the property to include any buffer zone(s), as well as the broader setting.

As a result of the inscription, the World Heritage Committee is now a stakeholder in ensuring the Rideau Canal’s future as a World Heritage site. From the perspective of the Committee, the overarching goal is that the Rideau Canal will be protected and managed effectively to the highest level by a comprehensive and coordinated planning and regulatory framework to ensure that its Outstanding Universal Value, integrity and authenticity are maintained, enhanced and presented. Through the *Rideau Canal World Heritage Site Management Plan* (2005), Parks Canada is committed to safeguard the canal’s visual setting. For further details and documents about the Rideau Canal World Heritage site, please visit the World Heritage Centre website at <https://whc.unesco.org/en/list/1221/>.

Discussion

The 30m buffer zone surrounding the World Heritage site corresponds with the 30m min development setback from water. We would encourage that new dwellings are situated beyond the 30m buffer zone such that any anticipated future development activity, such as decks, gazebos or pools would also fall outside the buffer zone. We also encourage maintenance of the existing vegetation/trees within this 30m setback in particular, and on the overall property in general.



The subdivision application proposes nine new waterfront lots along the canal, in addition to the existing dwelling. The existing dwelling is situated beyond the 30m buffer zone of the world heritage site. The proposed dwellings are situated at a minimum of 40m from the shoreline, providing a 30m undisturbed vegetated zone along the waterfront, and a minimum of 10m as amenity space associated with the residential use of the properties.

It is recommended that further discussion is undertaken to most effectively protect the 30m buffer as an undisturbed zone, such as a rezoning of these lands through an application to the Village of Merrickville-Wolford.

We would encourage developing the property in a manner that complements the visual character of the landscape. The use of building materials and colours that blend in with the surrounding landscape are encouraged. Earth tones and neutral colours are recommended for the finished exterior of the dwelling. Reflective materials, such as galvanized and bare metals, particularly for roof coverings and support structures, are discouraged. Over the last ten years, Parks Canada has been working closely with all 13 municipalities, 3 counties and 2 conservations authorities along the Rideau Canal as part of a collaborative working group called the Rideau Corridor Landscape Strategy. One of the initiatives undertaken by this group is the [Principles for Good Waterfront Development](#). The 10 Principles provide helpful guidance when undertaken new development/redevelopment along the historic site. More specifically, the Village (both village centre and rural) has quite a rich historic character with common themes of stone, wood and gable roofs. We would encourage you to look to the local built environment to inform new residential dwellings. To this end, the Village's Design Guidelines will be informative.

As requested during the pre-consultation phase of this proposal in 2021, to assess the impact of the proposed development on the national historic site, world heritage site and its setting, **we request that a heritage impact assessment, including a visual impact assessment, is conducted.** This can entail a concept rendering as viewed from the navigation channel.

The preliminary design direction provided by S.J. Lawrence Architects can serve as a basis for development that is harmonious with the local landscape character and minimizes the visual impact on the canal. This preliminary design direction can be a key part of the conservation strategy/mitigation measures that may be proposed in a heritage impact assessment.

In-Water Works

Any proposed in-water or shoreline works requires submission of an application to the Rideau Canal Office of Parks Canada, and must adhere to Parks Canada's Policies for In-Water and Shoreline Works and Related Activities. You can learn more about our permitting process [here](#).



As noted during the pre-consultation phase of this proposal in 2021, there are challenges with any future potential in-water works as the navigation channel is close to the shoreline, most waterfront lots have a high sand embankment and feature woody debris in the nearshore area. In addition, the entire shoreline is potential Eastern Musk Turtle habitat. The Musk Turtle is a Special Concern Species at Risk both provincially and federally.

Further to a preliminary desktop review and a site visit on June 4, **Parks Canada provides the following recommendations and conclusions as they relate to future potential in-water and shoreline works:**

- In areas accessible to view during the site visit, the majority of the toe of slope along the shoreline of Lots 3 to 27 feature a mixture of vegetated cattail areas or woody debris. Areas of exposed sand at the toe of the slope could be supported for review to install a form of toe protection, such as rip-rap or a bioengineered treatment. Please note that a blanket toe treatment fronting all lots would not be supported.
- The existing trail on the south edge of Lot 27 (existing dwelling) could be supported for a possible upland viewing platform. Given the band of cattails along the shoreline and the proximity to the navigational channel, a launch ramp and or dock would not be supported.
- Opportunity for in-water and shoreline structures, including docks, is highly limited along the entire shoreline. Such structures would not be supported at Lots 3 – 9, and Lot 27.
- The existing Park Block is confirmed to have a location that a small dock configuration, such as a U-shaped or multi finger dock, would be supported for review.
- Near the lot line between Lots 1 and 2, there is a secondary location that a small dock configuration, parallel and contiguous to the shoreline, would be supported for review.
- It is noted that the Park block, with the intent to allow waterfront access for 16 backlot owners, is extremely undersized. As such, it is recommended that the Park block be expanded to include Lots 1 and 2.

It is also acknowledged that there are three registered Indigenous archeological sites on the subject property. As such, Parks Canada will require the completion of a marine archaeological study to inform the location and configuration of future in-water structures.

It is understood that the proponent intended to leave the pursuit of in-water structures, such as docks, to the future individual property owners. However, given the limited opportunities for access, the desire for a communal access point, and the requirement for a marine archaeological study, **Parks Canada recommends that the marine archaeology study, Park Block configuration and location of water access structures are confirmed at this stage in the planning process, to inform revisions to the subdivision application.**



Stormwater Management

General

- Parks Canada is supportive of all efforts to retain stormwater on site through swales and green technology in order to reduce the runoff volume entering the Rideau River.
- It was noted that the mitigation at the stormwater outlet during construction is a strawbale check dam. In our experience strawbale check dams will be effective at capturing larger sized particles but not silts and clays. If the soil profile at this site contains silts and clays this method may not be sufficient to meet water quality thresholds for turbidity.
- It should be determined whether scour protection at the stormwater outlet into the Rideau River is necessary to prevent turbidity events (water flowing in an area where this has not occurred is likely to suspend sediment). As discussed in below, this would have a potential negative impact to aquatic habitat. Note that any work on the bed of the Rideau Canal (e.g., placement of riprap as scour protection) would require a Parks Canada In-Water and Shoreline Work Permit and possibly review under the Impact Assessment Act.
- Mitigations will need to be in place to maintain water quality at the stormwater outlets to the Rideau River during periodic cleaning of the stormwater facilities.

Discharge Monitoring

- During the construction period, mitigations should be in place to keep stormwater clean, and a monitoring program must be put into place at the outlet to monitor turbidity levels. As a federal waterway, Parks Canada requires that construction projects that impact the canal's waters meet the CCME Canadian Water Quality Guidelines for Protection of Aquatic Life – Total Particulate Matter: <https://ccme.ca/en/res/total-particulate-matter-encanadian-water-quality-guidelines-for-the-protection-of-aquatic-life.pdf> It is particularly important that turbidity events not occur during the in-water work restriction window of January 1-June 30 in order to protect spawning fish and their eggs.
- Long-term discharge into the Rideau Canal must also meet the CCME Canadian Water Quality Guidelines for Protection of Aquatic Life – Total Particulate Matter. A long-term monitoring plan should be established to ensure that these guidelines are met. Note that meeting this guideline may result in more than the 80% TSS removal outlined in the MOE “enhanced” standard. It will depend on the measured TSS of the discharge compared to background conditions.
- Parks Canada would be happy to provide input on the scope of the construction-based and long-term monitoring programs and appreciates the opportunity to provide comments on the draft plans.



Recommendation

While we have no objection in principle to the plan of subdivision application, Parks Canada recommends deferral of application 07-T-20252 until such time as the items noted above are addressed to our satisfaction.

Please inform Parks Canada of any decision made with regards to this application.

If you have any questions, please contact the Ontario Waterways Planner Susan Millar at susan.millar@pc.gc.ca.

Sincerely,

David Britton
Director
Ontario Waterways

cc: Eric Lalande, Planner, Rideau Valley Conservation Authority
Forbes Symon, Planner, Village of Merrickville-Wolford