

August 28, 2024

Michael Benner
Director of Development and Infrastructure
Township of Georgian Bluffs
planning@georgianbluffs.ca

**RE: Consent Application B20-24 - Beckett
CON 17 LOT 12; Keppel
Township of Georgian Bluffs
Roll: 420362000501900
Owner: Matt and Jocelyn Beckett**

Dear Michael Benner,

This correspondence is in response to the above noted application. We have had an opportunity to review the application in relation to the Provincial Policy Statement (PPS) and the County of Grey Official Plan (OP). We offer the following comments.

Proposal

Application B20/24 proposes to sever an area of approximately 1.5 ha with frontage of approximately 150 m along Concession 17 Road for the future construction of single detached dwelling. The retained parcel would have an area of approximately 40.1 ha with frontage of approximately 225 m along Concession 17 Road and is occupied by an existing single detached dwelling, garage and barn used for storage.

The subject lands are identified as the following in the County Official Plan:

- Schedule A – Land Use Types – Rural, Hazard, Provincially Significant Wetland
- Schedule C - Natural Heritage System Core Areas and Linkages – NHS Linkage
- Appendix A – Constraint Mapping – Karst Area
- Appendix B – Constraint Mapping – Significant Woodlands, Other Wetlands

Schedule A of the County OP designates the subject lands as Rural. Section 5.4.3(1) states:

All consents for new lot development shall be no smaller than 0.8 hectares in area, and the maximum lot density shall not be exceeded as outlined in Table 9 below. The lot density is determined based on the original Township lot fabric (i.e. as determined by the original crown survey) and shall be pro-rated up or down based on the size of the original Township lot. Any proposed increase to this maximum lot density will require an amendment to this Plan, and will require justification as to the need for additional Rural lot creation...

Table 9: Permitted Rural Severances based on Original Township Lot Size

Original Township Lot Size (in hectares)	Number of Severances Permitted	Total Lots Permitted including the Severed and the Retained
20	1	2
40	3	4
60	4	5
80	5	6

In

order to avoid narrow linear parcels of land, the frontage-to-depth ratio for non-farm sized lots (see Diagram 1 below) shall be a maximum of 1:3 and the lot must conform to the appropriate zoning by-law in reference to minimum lot frontage and other applicable provisions. Justification to go beyond the 1:3 frontage-to-depth ratio shall be justified in a development application, but will not require an amendment to this Plan.

1. The size of the original township lot (LOT 12, CON 17) is approximately 40 hectares. Per Table 9, the creation of an additional lot would meet County OP lot densities. While the severed lot would have a lot area greater than 0.8 hectares (1.5 ha), the proposal does not meet the required frontage-to-depth ratio. Additional comments regarding the proposed lot configuration are provided below.

Per Section 5.2.2 5), new land uses, including the creation of lots, shall comply with the Provincial MDS formulae.

2. MDS calculations were not provided with the application.

Schedule A of the County OP indicates that the subject lands contain Hazard Lands and Provincially Significant Wetlands. The proposed severed lands are within the adjacent lands (120m) of a PSW. Section 7.3.1 states:

1) No development or site alteration is permitted within the Provincially Significant Wetlands and Significant Coastal Wetlands land use type (shown on Schedule A), except where such activity is associated with forestry and uses connected with the conservation of water, soil, wildlife, and other natural

resources but does not include buildings and will not negatively impact the integrity of the Wetland.

2) No development or site alteration may occur within the adjacent lands of the Provincially Significant Wetlands and Significant Coastal Wetlands land use type unless it has been demonstrated through an environmental impact study, as per Section 7.11 of this Plan, that there will be no negative impacts on the natural features or their ecological functions.

Development or site alteration within the adjacent lands of the Provincially Significant Wetlands and Significant Coastal Wetlands land use type will require a permit from the appropriate conservation authority.

In addition, Appendix B also indicates that the subject lands contains Significant Woodland. Section 7.4 states:

- 1) No development or site alteration may occur within Significant Woodlands or their adjacent lands unless it has been demonstrated through an environmental impact study, as per Section 7.11 of this Plan, that there will be no negative impacts on the natural features or their ecological functions.*
- 2) Tree cutting and forestry will be permitted in accordance with the County Forest Management By-law (or successor thereto), and guided by the policies of Section 5.5 of this Plan.*

Schedule C indicates that the proposed severed lands are within a Natural Heritage System Linkage corridor. Section 7.1 8) states:

New non-farm sized lot creation is not permitted in Core Areas or Linkages, except for the creation of conservation lots. Lots created for infrastructure purposes may also be considered, where it can be demonstrated that there is no alternative outside of Core Areas or Linkages. The severance of a surplus farmhouse may be permitted within Core Areas or Linkages, provided no new residential dwellings are permitted on the remnant parcel. Farm sized lot creation may be considered in Core Areas or Linkages.

- 3.** The proposed severance contemplates the creation of a new non-farm sized lot within an area identified as a Linkage, which is not permitted in the County OP. As such, County planning staff recommend refusal of the application. Farm sized lot creation *may* be considered in Linkages (a farm sized parcel in the Rural designation is 20 hectares). Alternatively, a non-farm sized parcel *may* be located outside of the Linkage, provided all other planning policies can be sufficiently addressed.

4. County ecology staff have reviewed the proposal and provide the following comments:
 - i. Natural Heritage: The property contains and/or is adjacent to provincially significant wetland, significant woodlands, significant wildlife habitat, potential habitat for threatened and/or endangered species, other wetlands, natural heritage linkage area, and fish habitat. It is Grey County staffs understanding that the proposed development will be located within and/or adjacent to the features. As such, it is Grey County Staffs opinion that the potential impact to natural heritage needs to be assessed through a scoped Environmental Impact Study (EIS). We recommend the consultant contact this office to determine a Terms of Reference for the study.
 - ii. Stormwater Management: It is Grey County Staffs understanding that stormwater management infrastructure is not needed for the proposal.
 - iii. Source Water Protection: It is Grey County Staffs understanding that the property does not contain protection areas that are subject to policies of the Source Water Protection Act.
5. Should the applicant seek to injure or destruct trees on lands that extend more than 15 metres from the outer edge of which a Building Permit has been issued, staff recommend consulting the [County's Forestry Management By-law](#). An exemption to the by-law is required, for example, to injure or destroy trees in order to install and provide utilities to the construction or use of a building, structure or thing for which a Building Permit has not been issued or for the cutting of a tree in a forested area 1 hectare in size or larger.
6. Appendix A indicates that the proposed severed lands contain karst topography. Development shall generally be directed to areas outside of karst topography unless the effects and risk to public safety are minor so as to be managed or mitigated. Section 7.5 details karst assessment, including digging test holes on site which must be inspected by a qualified individual. County staff would recommend that a test holes be dug, as outlined in Section 7.5 of the County's Official Plan, prior to the creation of a new lot, to ensure that a safe building envelope is achievable. Staff would further recommend that any forthcoming karst report be developed in conjunction with the requested EIS, to ensure that any proposed building envelope would not impact on-site natural heritage features.

7. County staff would note that there is an 80-hectare quarry expansion proposed on lands located 400 meters west of the subject property, at the north-west intersection of Zion Church Road and Concession 17. County staff are raising this information to acknowledge that future residents may be subject to extraction-related noise in future, should the proposed quarry be approved. More information about the proposal can be found here:
<https://www.grey.ca/government/land-use-planning/planning-and-development-projects/forbes-quarry-expansion>

In summary,

- County Planning staff recommend that the proposed severance application to create a 1.5 ha non-farm sized rural residential lot be refused.
- Should the application be amended to contemplate farm sized lot creation (i.e. the severed and retained lands each having a lot area of 20 hectares) or a non-farm sized lot outside of the Linkage, a scoped EIS, karst assessment, and MDS calculations would be required. From a general planning perspective, it should also be ensured that on-site water servicing and on-site sewage servicing can be safely provided [per Section 5.5.5 22)].

The County requests notice of any decision rendered with respect to this file.

If you wish to discuss this matter further, please contact me.

Yours Truly,

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