



RON DAVIDSON LAND USE PLANNING CONSULTANT INC.

January 23, 2025

Township of Georgian Bluffs
177964 Grey Road 18
R.R. #3
Owen Sound, ON
N4K 5N5

Attention: Michael Benner
Director, Development & Infrastructure

Dear Michael:

**Re: Planning Justification Report
Applications for Consent and Zoning By-law Amendment
Part Lots 13 and 14, Concession 12, Geographic Township of Sarawak
Township of Georgian Bluffs
ARN: 420358000302500
Address: No assigned number
Owner: Kinsale Investments Limited c/o Ed O'Brien**

Further to numerous pre-consultation discussions with Township staff regarding lot creation on the above-noted property, enclosed please find four Consent applications and one Zoning By-law Amendment application.

Included in this submission package is a Feasibility Study prepared by GEI Consultants that addresses road access, onsite servicing, and stormwater management. A Section 59 letter from the Risk Management Official is also enclosed.

The cheques covering the application fee and the Grey Sauble Conservation Authority (GSCA) review fee have been hand-delivered to your office by the landowner.

To assist your office in evaluating this development proposal, I am providing the following information:

Purpose of Application:

Kinsale Investments Limited owns a 77.84-hectare parcel of land in the former Township of Sarawak from which the owner proposes to sever four residential lots, each comprising approximately 0.8 hectares. A 74.64-hectare property will be retained.

The proposed lot creation is illustrated on Figure 1 of this Planning Justification Report.

Approvals Required:

This lot creation requires:

- approval of four Consent applications by the Township of Georgian Bluffs Committee of Adjustment; and,
- approval of a Zoning By-law Amendment application by Township Council.

Pre-consultation / Supporting Documents:

Over the course of the last few years, a series of pre-consultation discussions have been held to consider this four-lot development, including an on-site meeting in the summer of 2024 with Township staff, the landowner, the consulting Engineer, and the author of this Planning Justification Report. These discussions formed the basis for the submission requirements for the Planning Act applications.

As requested by the Township, the consulting Engineer (GEI Consultants) has prepared a Feasibility Study that addresses improvements to Golf Course Road, the servicing of the proposed dwellings with potable water supplies and private septic systems, and the management of surface water. The Feasibility Study is summarized as follows:

- Golf Course Road is a gravel municipal street having a width of approximately 5.5 metres to 6.0 metres. It experiences very little traffic as it primarily serves as maintenance access to the adjacent golf course. At approximately 380 metres north of the Golf Course Road / Grey Road 17A intersection, the road narrows in width and is gated. To facilitate the proposed lot creation, the narrow section of the roadway will be widened over a length of 170 metres, and a new cul-de-sac will be constructed. The existing gate will be removed. Access to the golf course will be maintained. The developer will be responsible for all costs associated with the road improvements and will convey to the Township a small parcel of land upon which

the cul-de-sac will be constructed. The mature trees lining the east side of the existing road allowance will be preserved;

- A sub-component of the Feasibility Study was a detailed Hydrogeological Study that was conducted to address the private servicing arrangement proposed for the new lots. The Hydrogeological Study included a nitrate assessment, which concluded that the four new lots are suitable for individual private septic systems. This study also determined that the average transmissivity of the bedrock aquifer from which the potable water would be supplied is poor, and if on-site investigations confirm that this aquifer cannot support the water demands in accordance with Provincial standards, a water storage facility (e.g. cistern) will need to be constructed on each new lot to ensure that sufficient water can be supplied during peak demand periods. A private well would be drilled on each of the four lots and would pump water into the water storage facilities during the non-peak demand times. Since the writing of the Hydrogeological Study, one well has been drilled to assess the flow rate, and it has confirmed that water storage facilities will be necessary at that location; and,
- A second sub-component of the Feasibility Study was a Stormwater Management Brief. This document considered existing drainage conditions and determined that stormwater can be managed effectively through lot-level stormwater management facilities, which would include a combination of enhanced grassed swales, a surface pond, and rear and side yard swales graded to follow the existing drainage patterns.

This Planning Justification Report is also required as part of the submission package to the Township. This Report has been written to provide an evaluation of the proposed development within the context of the Grey County Official Plan and the Provincial Planning Statement.

Saugeen Ojibway Nation (SON) was also involved in the preliminary discussions and advised that an Archaeological Assessment must be completed for the four severed parcels and approximately 50% of the retained parcel before the lot creation can be finalized. On this note, SON has since accepted a work plan prepared by Great Lakes Archaeology and has agreed that a holding (h) symbol can be attached to the zoning of the remainder of the retained parcel to ensure that no building activity until a further Archaeological Assessment has been undertaken. This zoning matter is discussed in greater detail later in this Report.

Subject Property:

The subject property is located at the northwest corner of the Grey Road 17A / Golf Course Road intersection.

These lands were previously occupied by a driving range, used in the conjunction with the neighbouring golf course. Approximately 15 years ago, this parcel was sold and has since been used primarily for cash-cropping purposes. A small building (driving range hut) exists near the southeast corner and will be removed. A few areas of forested land and scrubland exist on the site. All features on the property are shown on Figure 1.

Adjacent Land Uses:

The Legacy Ridge Golf Course occupies the land to the east, along the opposite side of the Township road, and to the immediate north of the subject property. Two residential lots have been established along the west side of Golf Course Road. Other land uses within the immediate vicinity include a cemetery to the southeast, forested lands to the northwest and west, and agriculture to the west and south.

Township of Georgian Bluffs Zoning By-law:

The subject lands are zoned predominantly 'OS1' (Open Space), according to Schedule A of the Township's Zoning By-law and as illustrated on Figure 2. This zoning reflects the previous use of the site as a driving range.

Certain areas of the retained parcel are zoned 'EP' (Environmental Protection).

The Zoning By-law Amendment application proposes to rezone the 'OS1' lands to 'RU' (Rural).

Agricultural uses in the 'RU' zone require a minimum lot area of 20 hectares and a minimum lot frontage of 200 metres, whereas the minimum lot area and frontage standards for residential uses in the 'RU' zone are 0.8 hectares and 100 metres, respectively. The retained farm parcel will comply with these minimum standards. The four residential lots will meet the lot area provision but will require relief from the frontage requirement. Lots 1, 2, and 3 will each provide frontages of 52 metres, whereas the frontage of Lot 4 will be 55 metres. This reduction will be provided in a site-specific zoning. This new zone could also include references to individual stormwater management facilities on each site and the need for a storage container for potable water supply. Including this engineering information in the Zoning By-law Amendment will provide for an added level of assurance that the future landowners will be aware of these servicing requirements when purchasing their respective properties.

A holding (h) symbol will be applied to approximately 50% of the retained parcel to ensure that an Archaeological Assessment is completed before any buildings are erected in the future.

The suggested wording of that site-specific zoning is as follows:

Lands within the RU-x zone shall be used in accordance with the RU zone provisions excepting that:

- (i) *the 'minimum lot frontage' shall be 52 metres;*
- (ii) *A Lot Grading and Drainage Plan shall be submitted at the Building Permit stage. A Stormwater Design Brief, prepared and sealed by a Professional Engineer (P.Eng.), shall also be required to demonstrate compliance with the Township's engineering standards, including confirmation that post-development stormwater runoff rates will not exceed pre-development conditions; and,*
- (iii) *In addition to the installation of a drilled well, a D-5-5 Hydrogeological Study will be required to confirm the adequacy of the potable water supply and to identify a feasible servicing solution, such as an on-site water storage system, to demonstrate compliance with Ontario's Design Guidelines for Drinking-Water Systems.*

The proposed rezoning is illustrated on Figure 3 of this Planning Justification Report.

Grey County Official Plan:

According to Schedule A of the County of Grey Official Plan, the subject lands are designated predominantly 'Rural', as shown on Figure 4 of this Planning Justification Report, with a few areas lying within the 'Hazard Lands' designation.

The 'Rural' policies stated in Section 5.4.3 of the Official Plan give consideration to limited lot creation. The number of lots allowed to be severed is based on the size of the original Crown-surveyed parcel. For example, a maximum of four lots – including the retained parcel – can be created from an original 40-hectare property.

In this regard the subject lands comprise part of the original Lot 13, Concession 2, Sarawak Township and the entire original Lot 14, Concession 2, Sarawak Township, as indicated on Figure 1. Both of the original parcels were established in the 1800s as 40-hectare holdings. Two lots have been severed in the past from Lot 13, Concession 2, and therefore consideration can be given to establishing one more parcel from this particular portion of the subject property. That proposed parcel is shown as Lot 1 on Figure 1. Since no lots have been severed from the original Lot 14, Concession 2, the Official Plan would allow for the creation of three new lots from this section of the subject property, as is proposed. Those

three parcels are shown as Lot 2, Lot 3, and Lot 4 on Figure 1. With this layout, the proposed development conforms with the 'Rural' density policies of the Grey County Official Plan.

The Official Plan also requires new lots created in the 'Rural' designated areas to comprise at least 0.8 hectares of land. The four severed parcels will comply with this minimum standard.

Furthermore, the consent policies for the 'Rural' area encourage lots to have a frontage-to-depth ratio of no greater than 1:3, although going beyond this ratio may be permitted where justified. The severed parcels will comply with this requirement.

The County Official Plan requires lot creation to comply with the Minimum Distance Separation (MDS) formulae. There are no livestock facilities located within close proximity of the proposed residential lots.

In addition, the general consent policies require new lots to front onto a public road. The four proposed parcels will have frontage along Golf Course Road. Improvements to the road will be required as described in the aforementioned Feasibility Study.

With regard to servicing, the Official Plan allows for the use of private wells and septic systems provided the site conditions are suitable for the long term. The nitrate assessment conducted by the consulting Engineer determined that the four new lots are suitable for individual private septic systems. It was also determined that a water storage facility (e.g. cistern) will likely be required to accompany a drilled well on each new parcel to ensure that a sufficient water supply can be provided during peak demand periods.

Schedule A of the Official Plan identifies most of the severed lands as 'Intake Protection Zone 3', with a small section of Lot 1 falling within the 'Intake Protection Zone 1' constraint. Intake protection zones are areas of land and water where run-off from streams or drainage systems, in conjunction with currents in lakes and rivers, could directly impact on the source water at the municipal drinking water intakes. Any building or development application involving land within an inland protection zone must include a Notice from the Risk Management Official as part of a complete application under Section 59(2) of the Clean Water Act, 2006, as amended. In this regard, the Risk Management Official has provided a letter stating no concerns with the proposal, a copy of which is attached.

No other constraints identified on the schedules and appendices of the Grey County Official Plan apply to the development proposed on the subject lands.

Based on the foregoing, it is evident that the proposed severances conform to the County of Grey Official Plan.

Provincial Planning Statement Conformity:

The Provincial Planning Statement (PPS) allows for limited lot creation on rural lands. Accordingly, the County Official Plan has provided policies that reflect the Province's position on this matter by allowing for a certain number of lots to be created within the 'Rural' designated areas, as explained above.

The PPS also protects natural heritage features. The proposed lot creation would not undermine any such policies.

In addition, the PPS encourages new development to be connected to municipal or communal water and sanitary sewage disposal mains where such services are available. However, where this form of municipal or communal servicing is not available, consideration can be given to the use of private wells and septic systems provided the site conditions are suitable for the long term. The proposed means of servicing supported by the Engineer's Feasibility Study.

Furthermore, the PPS protects areas of archaeological significance. In this regard, Saugeen Ojibway Nation has advised that an Archaeological Assessment must be completed for the four severed parcels and about 50% of the retained parcel before the lot creation can be finalized. A holding (h) symbol must be attached to the zoning of the balance of the retained parcel to ensure that no building activity occurs on these farmlands until an additional Archaeological Assessment has been undertaken.

It is evident that the proposed severances are consistent with the PPS.

Conclusions and Recommendations:

The proposed four-lot development conforms to the Grey County Official Plan and the Provincial Planning Statement and can therefore be given favourable consideration.

Prior to finalizing the severances, the landowner will be required to upgrade Golf Course Road, as explained in the Feasibility Study. The area of land on which the new cul-de-sac bulb will be constructed must be conveyed to the Township at the time in which the deeds for the new lots are being registered.

The Archaeological Assessment must also be completed before the deeds are registered for the four new severed parcels. The Assessment will be completed in consultation with Saugeen Ojibway Nation and must be entered in the Provincial registry for Archaeological Assessments before the Township can certify the deeds.

The recommended wording for the draft Zoning By-law Amendment is included earlier in this Planning Justification Report.

In conclusion, the requested severances and associated amendment to the Township's Zoning By-law have merit and should be approved.

Closing Comments:

I trust you will deem this application package to be complete. Should you require anything further, please contact the undersigned.

Lastly, it would be sincerely appreciated if you could advise of the potential meeting dates before actually scheduling the public meetings in order to ensure our availability.

Sincerely,



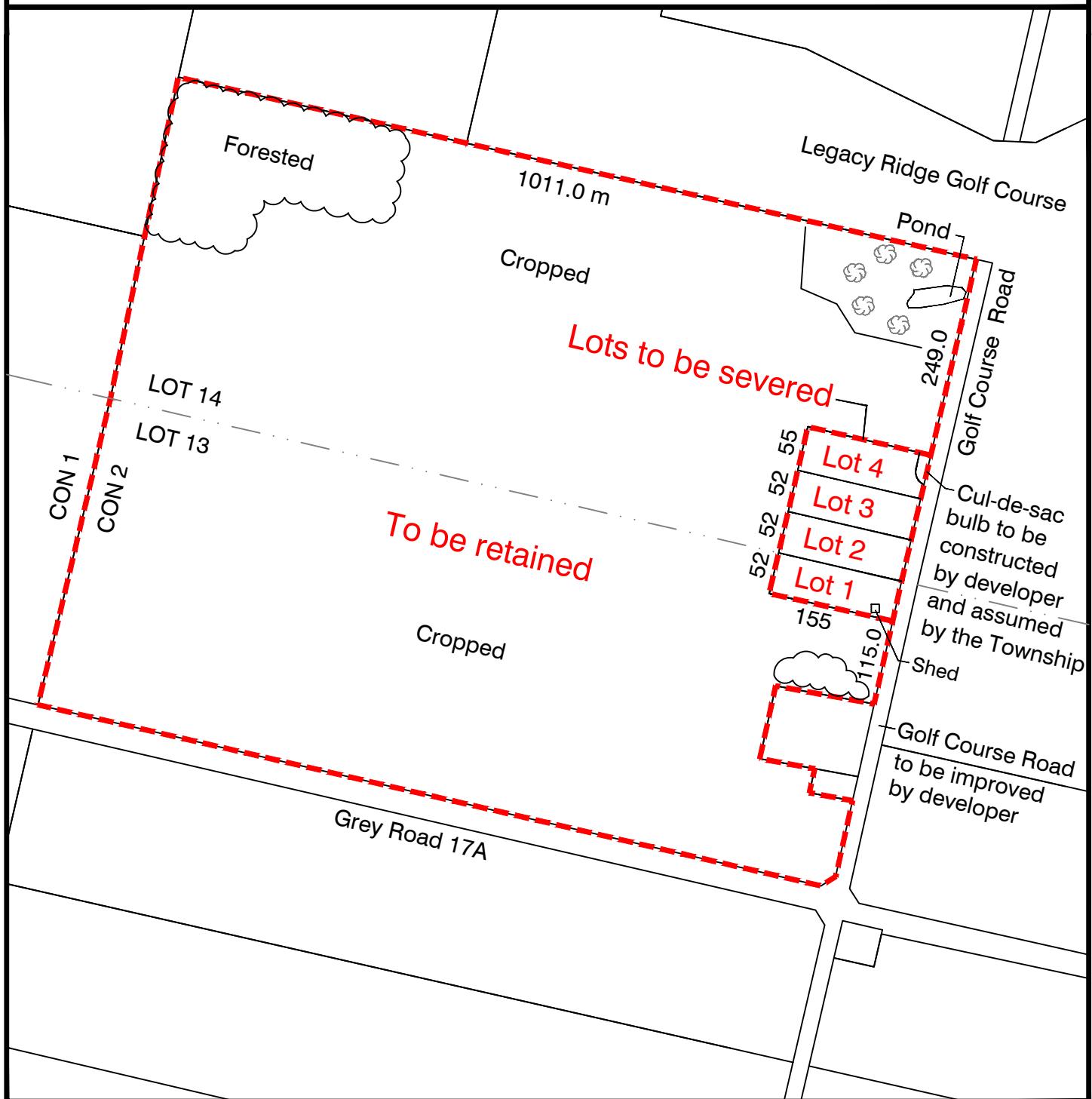
Ron Davidson, BES, RPP, MCIP

c.c. Kinsale Investment Limited c/o Ed O'Brien
Tyler Jahnke (GEI Consultants)

Figure 1: Proposed Lot Creation



 Subject Lands



Proposed Lot Creation
Golf Course Road
Township of Georgian Bluffs

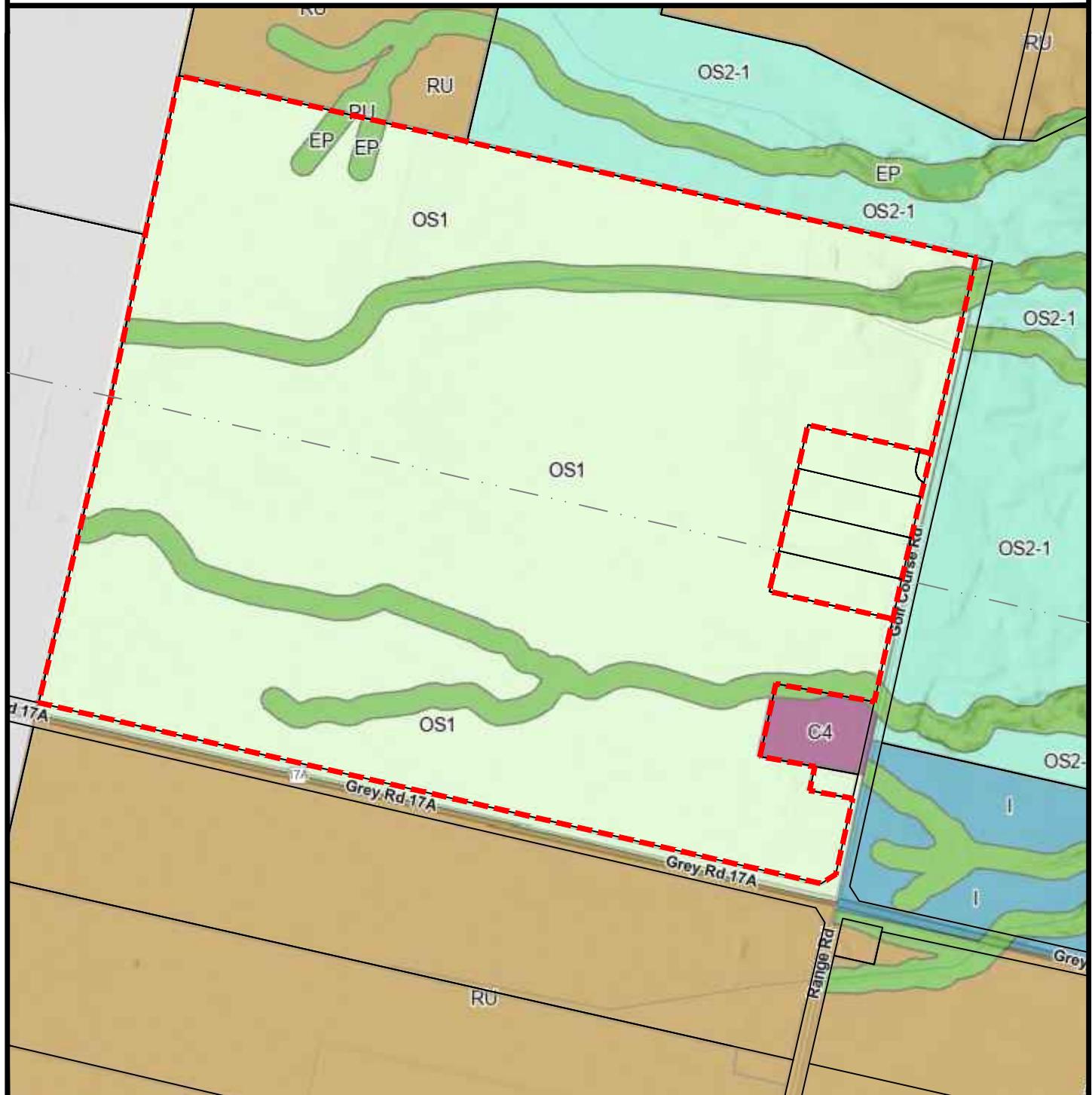


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SCALE 1:7000

Figure 2: Township of Georgian Bluffs Zoning By-law Schedule A



 Subject Lands

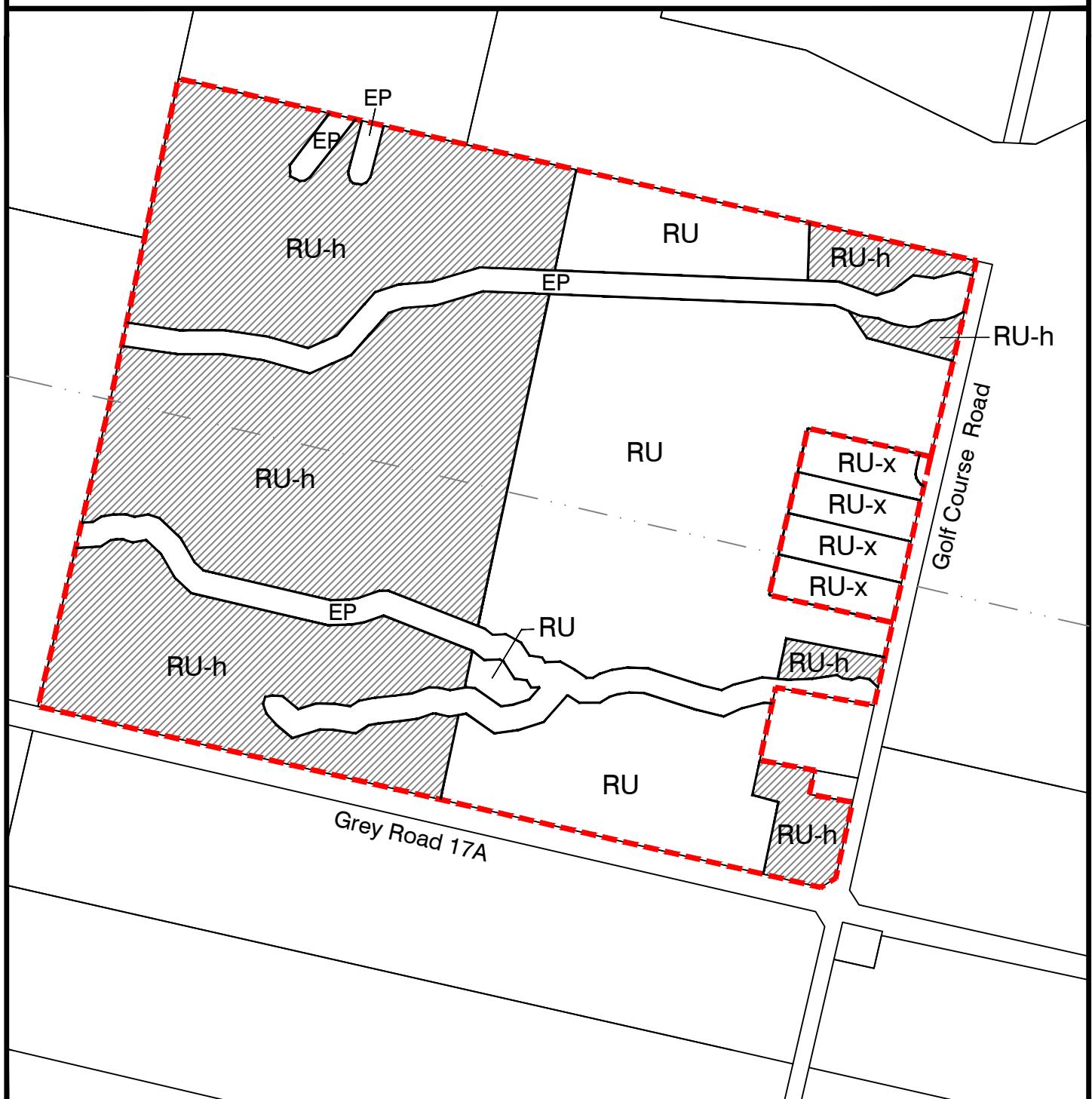


Proposed Lot Creation
Golf Course Road
Township of Georgian Bluffs

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Figure 3: Proposed Zoning

 Subject Lands



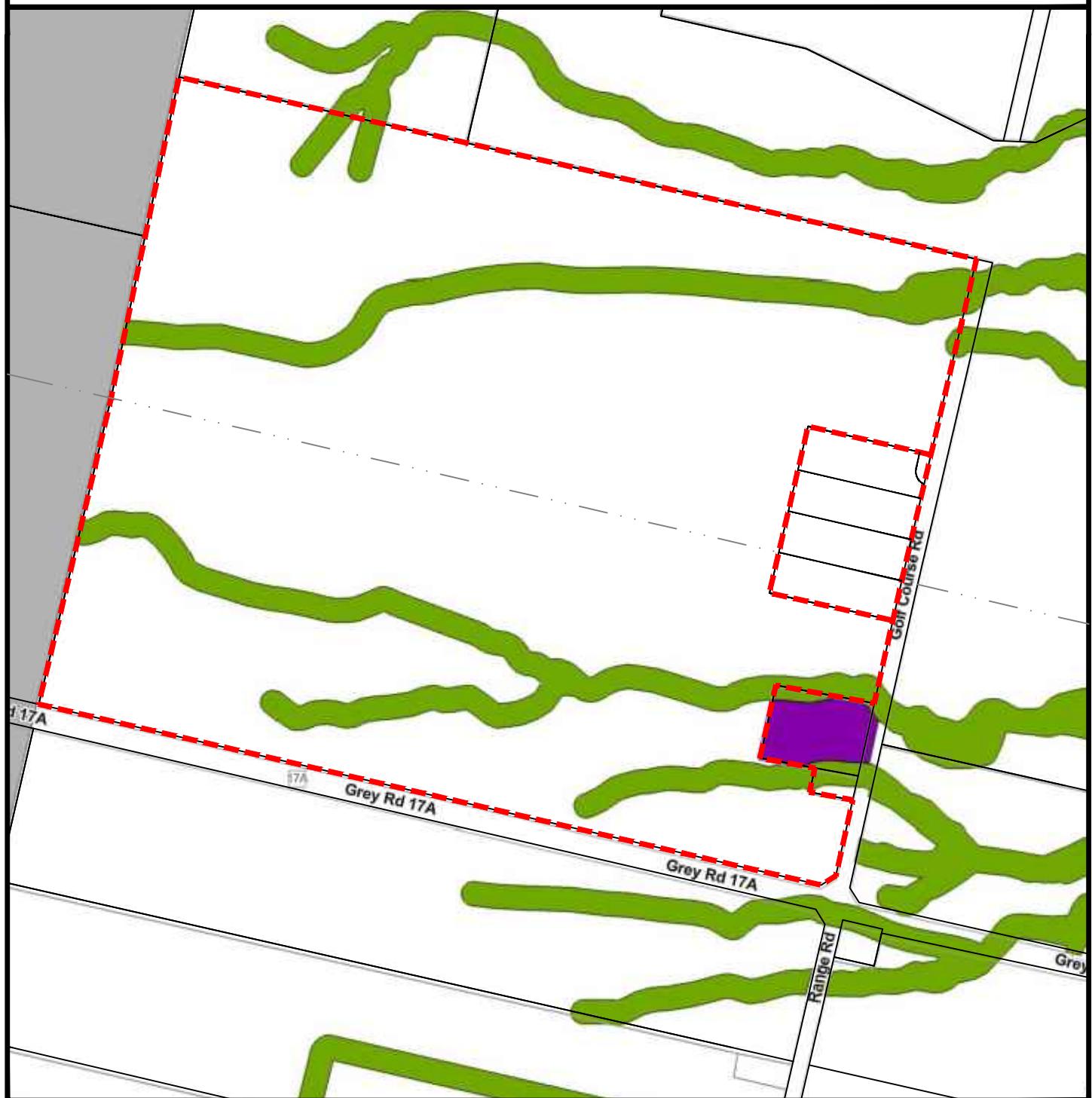
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Figure 4: County of Grey Official Plan Schedule A



 Subject Lands  Niagara Escarpment Plan  Hazards
 Rural  Space Extensive Industrial and Commercial



Proposed Lot Creation
Golf Course Road
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