

# PLANNING JUSTIFICATION REPORT

## APPLICATIONS FOR CONSENT & ZONING BYLAW AMENDMENT

### SUBJECT PROPERTY:

442538 Concession 21, Township of Georgian Bluffs, County of Grey.



**APRIL 2026, Revised June 2026.**

#### **Subject lands:**

442538 Concession 21  
ROLL NO: 420362000605800  
CON 21 W PT LOT 23 LESS; RP16R8085 PART 1  
Township of Georgian Bluffs, County of Grey

#### **Prepared for:**

Tim & Angela Fletcher  
File: 25023

#### **Prepared by:**



978 First Ave West  
Owen Sound, ON, N4K 4K5  
Tel: 519-372-9790  
Email: [cuesta@cuestaplanning.com](mailto:cuesta@cuestaplanning.com)

## TABLE OF CONTENT

<b>1.0 BACKGROUND AND CONTEXT</b> .....	<b>1</b>
1.1 Purpose of Report.....	1
1.2 Location, Description of Subject Lands & Surrounding Land Use (Figs. 1 & 2).....	1
1.3 Background and Description of Proposal.....	6
1.4 Pre-Submission Consultation and Approvals Required .....	8
<b>2.0 LAND USE POLICY CONSIDERATIONS</b> .....	<b>10</b>
2.1 Provincial Planning Statement, 2024 .....	10
2.2 County of Grey Official Plan (Recolour Grey).....	15
2.4 Township of Georgian Bluffs Zoning By-law, 2020-020 .....	29
<b>3.0 SUMMARY &amp; CONCLUSIONS</b> .....	<b>32</b>

### List of Figures

Figure 1: Location Map.....	2
Figure 2: Land Use .....	2
Figure 3: Grey Sauble Conservation Authority .....	4
Figure 4: Niagara Escarpment Plan.....	5
Figure 5: Site Plan.....	7
Figure 6: County of Grey Official Plan – Schedule ‘A’ .....	24
Figure 7: County of Grey Official Plan – Schedule ‘C’ .....	25
Figure 8: County of Grey Official Plan – Appendix ‘A’ .....	26
Figure 9: County of Grey Official Plan – Appendix ‘B’ .....	27
Figure 10: County of Grey Official Plan – Appendix ‘E’ .....	28
Figure 11: Township of Georgian Bluffs Zoning .....	31

### List of Tables

Table 1: Approvals Required .....	9
Table 2: Provincial Planning Statement Relevant Policy .....	11
Table 3: County of Grey Official Plan Relevant Policy (Recolour Grey).....	15
Table 4: Adherence to Rural Zoning Provisions - Residential and Non-Agricultural Uses.....	29

### List of Appendices

Appendix A: Site Plan	
Appendix B: Minimum Distance Separation Formulae Calculations	

## 1.0 BACKGROUND AND CONTEXT

### 1.1 Purpose of Report

Cuesta Planning Consultants Inc. (CPC) has been retained by Tim and Angela Fletcher to coordinate applications for a zoning by-law amendment application and consent to sever application that would have the effect of creating a non-farm residential lot, on lands legally described as CON 21 W PT LOT 23 LESS: RP16R8085 PART 1.

This report will examine the merits of the proposed severance by evaluating the proposal against the following:

- ❖ The Provincial Planning Statement (PPS)
- ❖ The County of Grey Official Plan (Recolour Grey); and
- ❖ The Township of Georgian Bluffs Zoning By-Law, 2020-020

This report, the accompanying application, fees, and supporting materials are intended to satisfy the requirements of Sections 34 (10.1) & (10.2) and 53 (2) & (3) of the Planning Act, regarding the submission of a complete application.

### 1.2 Location, Description of Subject Lands & Surrounding Land Use (Figs. 1 & 2)

The subject lands are 16.25 hectares (ha) in area and consist of the western portion of the original crown survey lot. The subject lands are irregular in shape, much longer than wide, with a natural southern border adjacent to Scale Lake.

The subject lands are mostly wooded. There is an existing residential dwelling and an associated accessory structure at the north end of the property adjacent to Concession Road 21. The dwelling is located in a woodland clearing that extends from the road approximately 210 metres (m) south. There is a trail weaving through the woodland from the residential dwelling to another clearing on the southern boundary of the subject lands adjacent to Scale Lake.

The elevation on the subject lands generally declines from the north to south in the direction of Scale Lake.

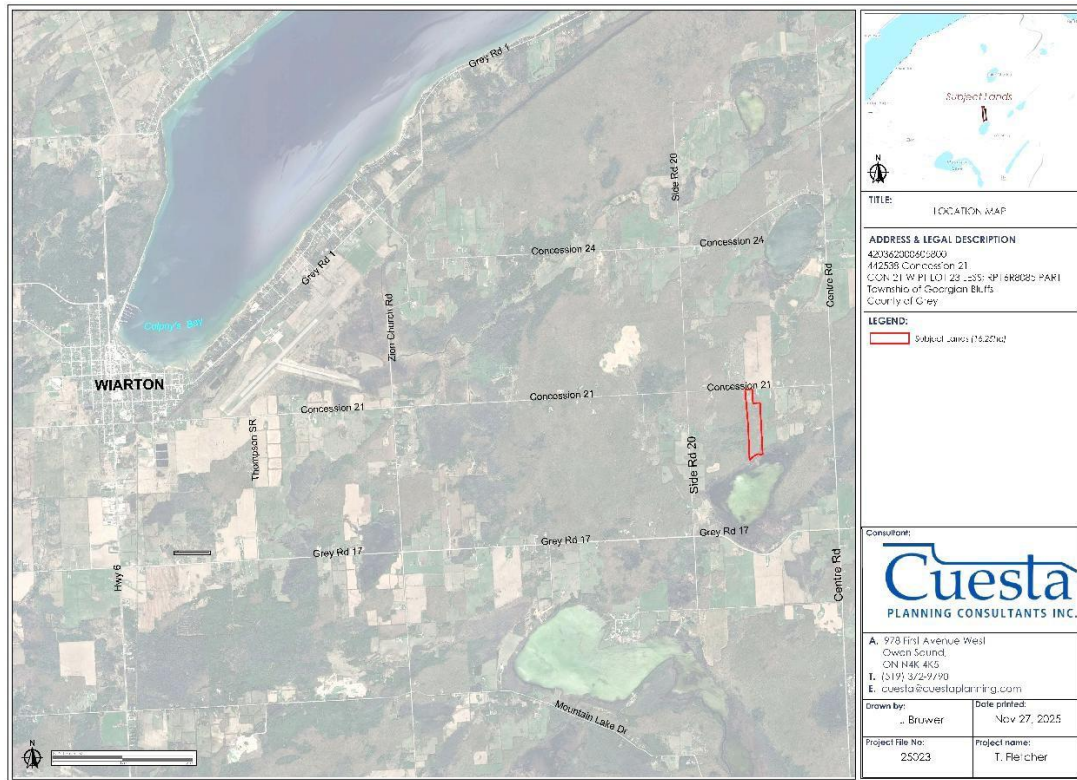


Figure 1: Location Map

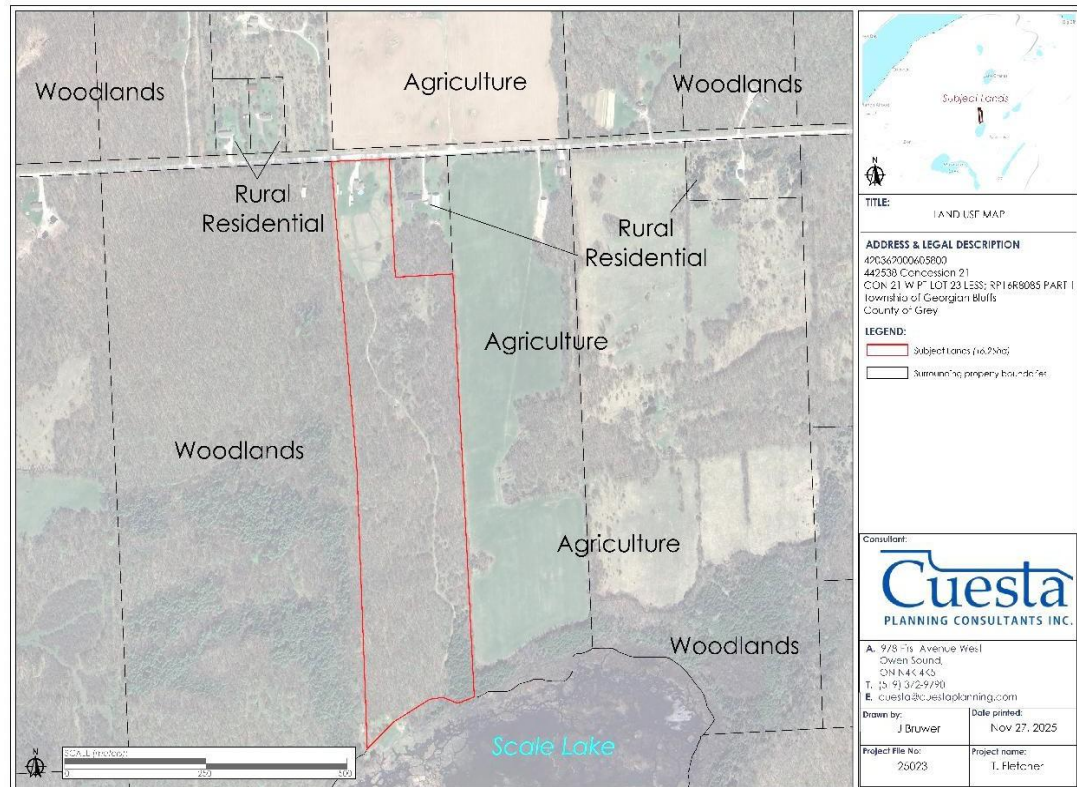


Figure 2: Land Use

The surrounding lands consist predominantly of woodlands interspersed with patches of agricultural land. The woodlands on the subject lands are contiguous with a large woodland that extends further to the west.

There are a number of existing rural residential dwellings to the north along Concession Road 21. One of these abutting rural residential dwellings is on a lot previously severed from the subject lands to the east. Concession Road 21 is a paved, year-round municipally maintained public road.

Agricultural uses in the surrounding area consist of cash-cropped fields located to the east and north. There is an existing unoccupied barn on the farm to the north.

The local topography is variable, consisting of localized hills, crests, depressions and water features. The Niagara Escarpment is located nearby to the east, less than one kilometre away. Besides Scale Lake, there are a number of small lakes in the local area, including Lake Charles, Mary Lake, Gowan Lake, Bass Lake, and Mountain Lake.

The uses on adjacent lands are summarized below:

- ❖ **North:** Rural Residential, Woodlands, Agricultural lands.
- ❖ **South:** Scale Lake
- ❖ **East:** Rural Residential and Agricultural lands.
- ❖ **West:** Woodlands and seasonal residence

The nearest settlement areas to the subject lands are Oxenden, nearly six (6) kilometres to the northwest, Kemble, seven (7) kilometres to the east, Big Bay, eight (8) kilometres to the northeast, and Warton, eight (8) kilometres to the west.

**Figure 2** provides a visual of the surrounding land uses.

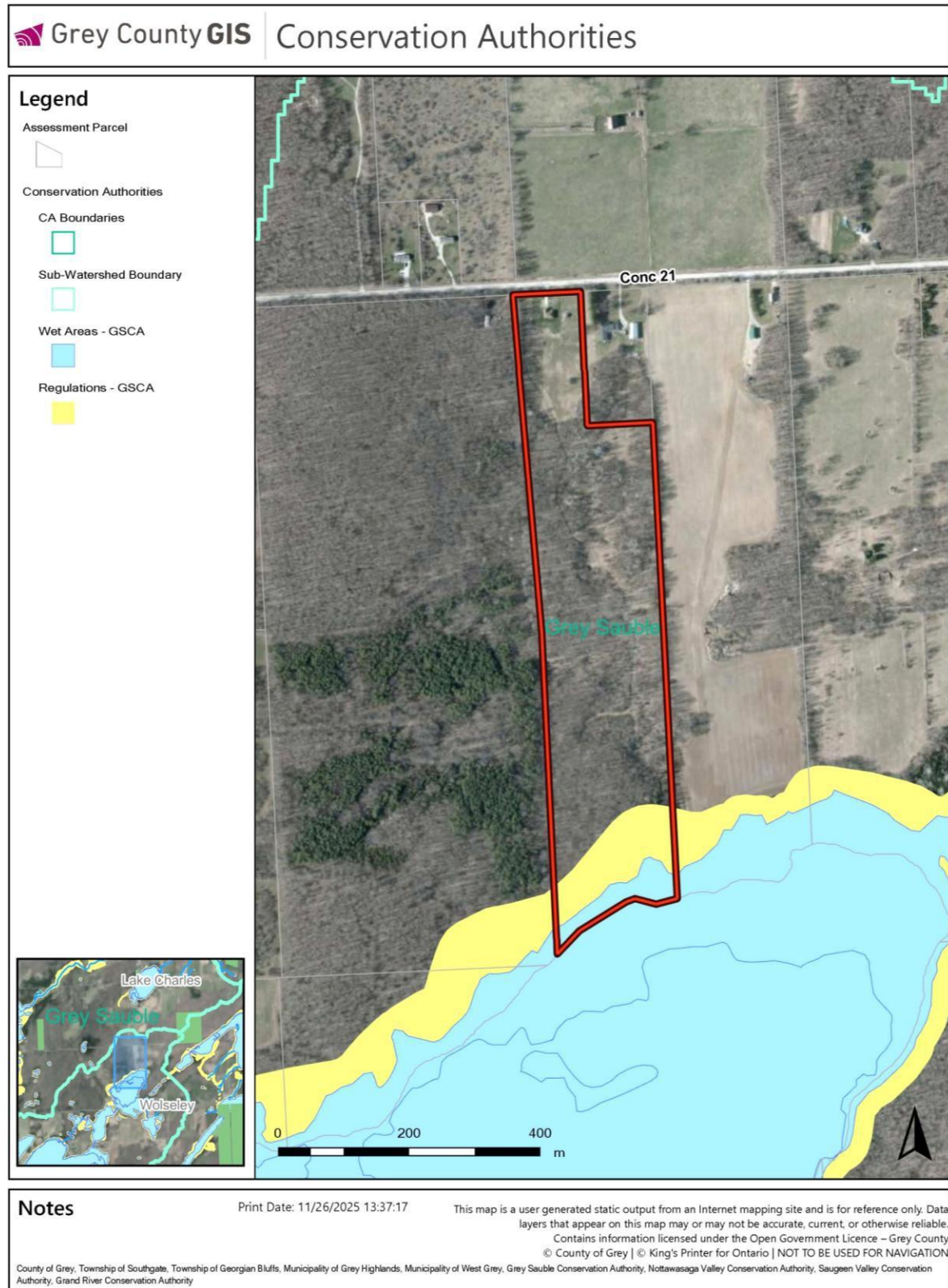


Figure 3: Grey Sauble Conservation Authority

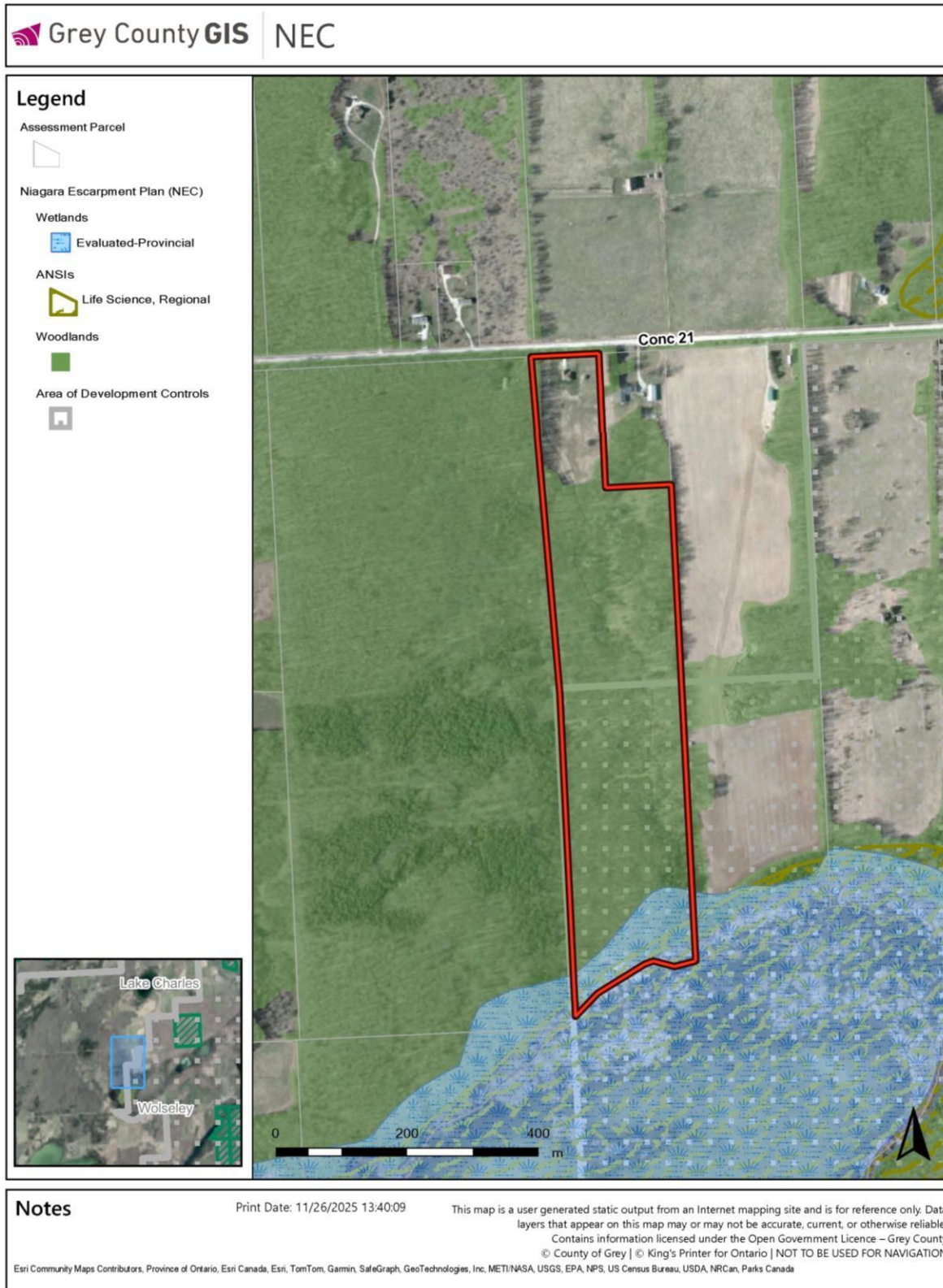


Figure 4: Niagara Escarpment Plan

### 1.3 Background and Description of Proposal

The proposal will involve the creation of a non-farm residential lot from an existing rural holding. The severed lands would be  $0.8\pm$  ha in area and the retained lands  $15.45\pm$  ha. The existing residential dwelling will be located on the lot to be severed. The lot will have a frontage of approximately  $67.8\pm$  and the retained lot will have a lot frontage of approximately  $34.6\text{m}\pm$ . The retained lands can support a new residential use however there are no current plans to build a new dwelling at this location.

The southern section of the subject lands are partially designated Escarpment Rural Area and Escarpment Natural Area under the Niagara Escarpment Plan (NEP). However, this proposal will not involve the lands designated under the NEP, and no new lot line will be located near lands designated under the NEP. Policies of the NEP are therefore not evaluated in this report.

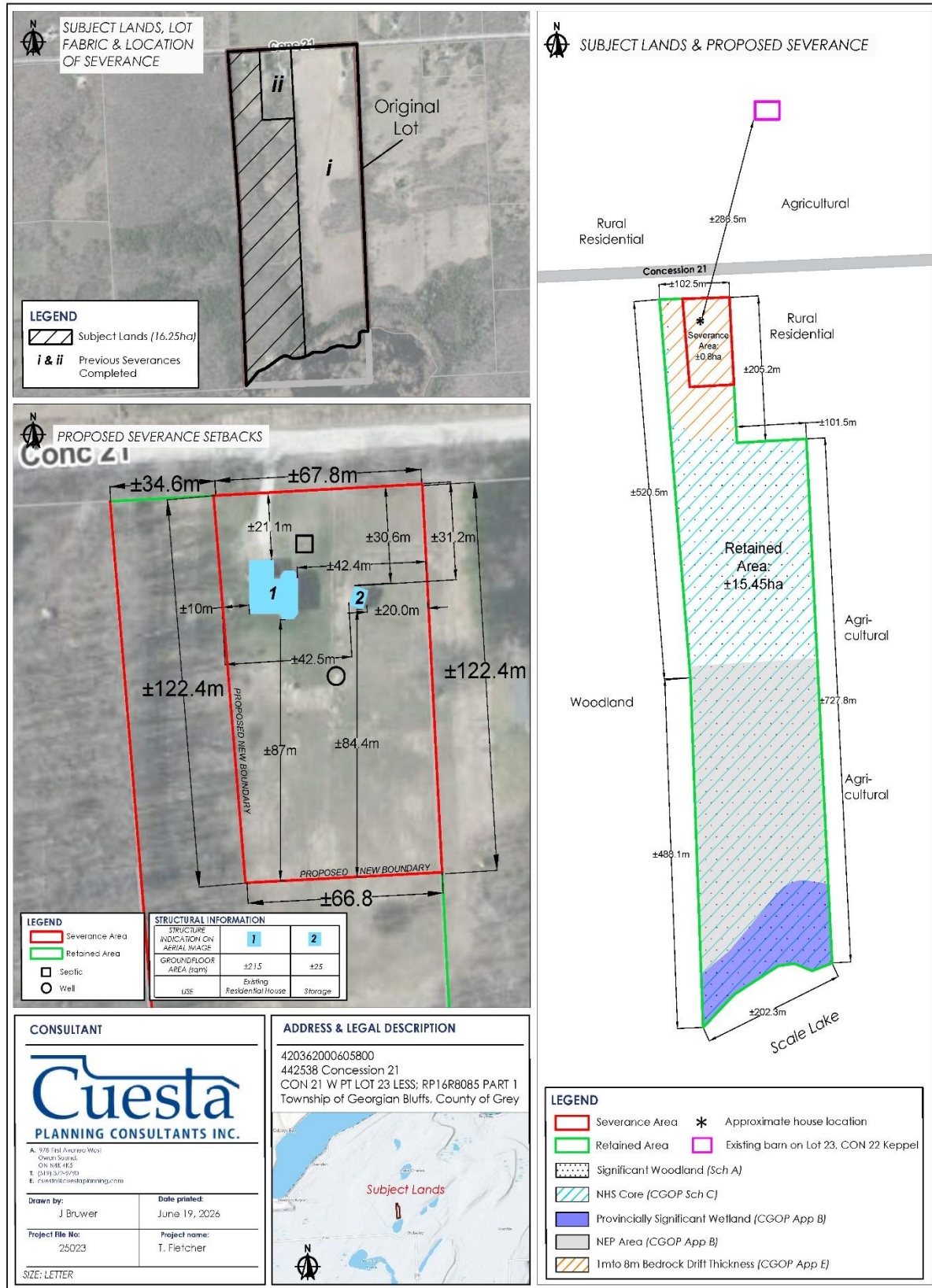


Figure 5: Site Plan

## 1.4 Consultation and Approvals Required

Cuesta Planning Consultants Inc. (CPC) consulted township staff and county staff prior to submitting the zoning by-law amendment application and consent to sever application.

County staff identified certain areas of interest that would need to be addressed. The first issue relates to the maximum lot density for lands in the Rural designation. County staff originally interpreted that, in the instance of a Township lot split between lands designated under the County Official Plan and Niagara Escarpment Plan, only the area of land in the Rural designation shall be considered with respect to the applicable rural area maximum lot density policy. However, as there no county policy to support this interpretation, the County staff revised this comment and confirmed that density requirements are met by the proposal.

Secondly, the subject lands are in a Bedrock and Shale Resource Area under Appendix 'E' of the GCOP, and justification was requested with respect to potential impacts on aggregate resources on-site and in the surrounding area. Thirdly, the County also noted that Natural Heritage System Core Area is mapped on much of the property, and that a karst assessment would be necessary because karst is mapped on much of the property. The karst assessment would determine if karstic features did occur on the site and would provide recommendations related to siting and construction of any future structures and related infrastructure.

Following submission of the applications, County of Grey planning ecology staff was able to visit the site and confirm that an access and building envelope can be accommodated on the retained lands without impacts to any natural heritage features. The County planning ecology staff recommended that a holding provision be included in the amending zoning by-law. The holding provision will require the completion of an Environmental Impact Study and a Karst Bedrock Hazard Study (unless otherwise waived by the approval authority) prior to development within any portion of the site within the holding area.

Township of Georgian Bluffs planning staff also attended on site and confirmed with Township Operations staff that, from an initial review, use of the existing access could be supported subject to the issuance of an entrance permit. Township of Georgian Bluffs planning staff requested additional rationale be included in this planning report related to the proposed reduced frontage on the retained parcel. Further comment in this regard has been included in Section 2.2 of this planning report.

An analysis of Township of Georgian Bluffs Official Plan has not been included in this report, as the rural areas of the Township are regulated by the County Official Plan policy. Based on the results of the consultation and a review of the applicable land use policy, the following approvals are required.

*Table 1: Approvals Required*

Application	Approval Authority
1. A <b>zoning by-law amendment</b> is required to recognize a lot frontage that does not meet the minimum prescribed on both the severed lands and the retained lands. The zoning by-law amendment can also establish a development setback from on-site natural heritage features.	Township of Georgian Bluffs
2. A <b>consent to sever</b> is required to create the proposed rural residential non-farm lot.	Township of Georgian Bluffs

## 2.0 LAND USE POLICY CONSIDERATIONS

The following analysis of the applicable land use policies considers how the proposal will meet the goals and intent of the relevant land use policy document and remain compatible with surrounding land uses. Considering provincial, county and local policies, it will be determined how the proposal represents appropriate land use planning.

In addition to the Provincial Planning Statement, the County of Grey Official Plan (GCOP), and the Township of Georgian Bluffs Zoning By-law No. 2020-020, will be evaluated as land use policy applicable to the proposal.

As noted previously, the Township of Georgian Bluffs Official Plan is not included in the evaluation of land use policy, as it is only applicable to the settlement areas of the Township.

### 2.1 Provincial Planning Statement, 2024

As stated under Section 3 of the Planning Act, all decisions by any authority that affect a planning matter shall be consistent with the Provincial Planning Statement (PPS). Any decisions made on or after October 20, 2024 are to be consistent with the 2024 PPS.

Any land use decision must be assessed against the applicable provisions of the PPS. Although the PPS is to be read in its entirety, the following provisions are the most applicable to the consideration of the proposal.

- ❖ Chapter 2: "Building Homes, Sustaining Strong and Competitive Communities"
- ❖ Chapter 3: "Infrastructure and Facilities"
- ❖ Chapter 4: "Wise Use and Management of Resources"
- ❖ Chapter 5: "Protecting Public Health and Safety"

The PPS generally permits lot creation on rural lands for residential uses, subject to the suitability of the land for an appropriate sewage and water system. Private individual on-site services, including a septic system, are the only viable means of servicing for this proposed development. There are various natural heritage features on the subject lands, in addition to karst, which are assessed more comprehensively under the evaluation of County policy.

The applicable Provincial Planning Statement policies are evaluated in **Table 2**.

*Table 2: Provincial Planning Statement Relevant Policy*

<p><u>2.5 Rural Areas in Municipalities</u></p> <p>1. Healthy, integrated and viable rural areas should be supported by:</p> <p>a) building upon rural character, and leveraging rural amenities and assets;</p> <p><u>2.6 Rural Lands in Municipalities</u></p> <p>1. On rural lands located in municipalities, permitted uses are:</p> <p>c) residential development, including lot creation, where site conditions are suitable for the provision of appropriate sewer and water services;</p> <p>2. Development that can be sustained by rural service levels should be promoted.</p> <p>3. Development shall be appropriate to the infrastructure which is planned or available, and avoid the need for the uneconomical expansion of this infrastructure.</p> <p>5. New land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.</p>	
<p><i>Policy Evaluation:</i></p>	<p>Rural lands are a component of the rural area under the Provincial Planning Statement (PPS). The proposal involves the creation of a new 0.8 ha± lot and retained lands of 15.45± hectares. The proposed lot size would be similar in size and character as existing rural residential lots in the surrounding area and throughout Grey County.</p> <p>As noted, lot creation for non-agricultural residential uses is permitted on rural lands subject to additional criteria. Under the PPS, the intent is for lot creation to provide for a lot size that ensures that a private septic system and private well can be provided in accordance with the requirements of the Ontario Building Code. This proposal will involve creating one rural residential lot that is of sufficient size and configuration to permit a private well and private septic system. The lot will have access to a year-round municipally maintained public road. The proposed lot creation is appropriate with respect to available services.</p> <p>Minimum distance separation (MDS) formulae calculations were prepared as part of this proposal. Lot creation for one non-farm lot is a Type A land use subject to MDS I. Within the investigation area of 750m, an unoccupied livestock facility was found at 442549 Concession Road 21, and MDS I setbacks were subsequently calculated. It was determined that a minimum distance of 185m is required from the livestock barn to the nearest portion of the sev-</p>

	<p>ered lands, whereas a distance of 252m will be provided between the live-stock barn and the nearest portion of the severed lands. This proposal complies with the minimum distance separation formulae.</p>
<p>3.6 Sewage, Water and Stormwater</p> <p>4. Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts.</p>	
<p><i>Policy Evaluation:</i></p>	<p>This proposal will involve the use of a private well and private septic system for the future residential development on the retained lands. The design of the septic system has not been determined, and is dependent on the design of a future rural residential dwelling. Due to the retained lot size, additional restrictions are not necessary to ensure adequate servicing on the retained lands.</p>
<p>4.1 Natural Heritage</p> <p>4. Development and site alteration shall not be permitted in:</p> <p>a) significant wetlands in Ecoregions 5E, 6E and 7E;</p> <p>5. Development and site alteration shall not be permitted in:</p> <p>b) significant woodlands in Ecoregions 6E and 7E;</p> <p>d) significant wildlife habitat;</p> <p>e) significant areas of natural and scientific interest;</p> <p>unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.</p> <p>8. Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5 and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.</p>	
<p><i>Policy Evaluation:</i></p>	<p>There are a number of natural heritage features on the subject lands including a part of the Mountain Lake Skinners Marsh Provincially Significant Wetland and woodlands. However, the proposed area of development will not be located in or near these features.</p>

The location and design of a future rural residential dwelling on the retained lands is not known. To ensure the safeguarding of these features, the implementing zoning by-law amendment should include a holding provision to ensure the required natural heritage and natural hazard review is completed prior to any development.

4.5 Mineral Aggregate Resources

4.5.2 Protection of Long-Term Resource Supply

5. In known deposits of mineral aggregate resources and on adjacent lands, development and activities which would preclude or hinder the establishment of new operations or access to the resources shall only be permitted if:

- a) resource use would not be feasible;
- b) the proposed land use or development serves a great long-term public interest; and,
- c) issues of public health, public safety and environmental impact are addressed.

*Policy Evaluation:*

The Letter of Opinion regarding Bedrock Resource Extraction by GEI Consultants assessed the potential for aggregate extraction activities on the subject lands.

Thickness of overburden was assessed as well as the potential location of the water table through review of MECP well records. Regulations were also briefly discussed in relation to natural heritage features on and near the property, and minimum required setbacks under the Aggregates Resources Act were considered.

In part, and with respect to provincial requirements, it was found that the developable area of the site for aggregate extraction is significantly constrained when minimum setbacks under the Aggregate Resources Act (ARA) are applied to existing residential uses, the road allowance, and from an adjacent open body of water. Applicable provincial and upper-tier planning policy, prioritizing existing natural heritage features at the site, further impedes an ARA licensing process. As well, residential development in the vicinity has previously compromised the viability of mineral resource extraction at this location.

5.2 Natural Hazards

2. Development shall generally be directed to areas outside of:

- b) hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards; and
- c) hazardous sites.

*Policy Evaluation:*

Karst is defined as a type of hazardous site under the Provincial Planning Statement. A Scoped Karst Assessment was prepared by GEI Consultants. The area assessed included the clearing in the north of the subject lands that would contain a future rural residential dwelling. A total of five test holes were dug to a depth of up of approximately 1m below ground surface, where bedrock was encountered. No standing or moving water was found in the soils or at the soil/bedrock boundary, and no active or significant karst features were evident.

The Scoped Karst Assessment recommended that, if bedrock is encountered during construction, the bedrock surface should be inspected in areas where it is exposed and at the locations of the proposed footings to confirm the absence of fractures or dissolution features. It is further recommended that the thickness of the overburden be confirmed to ensure that Ontario Building Code requirements are met for a septic system, and that a qualified person be retained for further inspection.

There are also hazard lands mapped on the subject lands, which are located in the southern section of the subject lands adjacent to Scale Lake. No new uses and no new buildings or structures will be established in or near these hazard lands as a result of this proposal.

In summary, the proposal complies with the applicable policies of the Provincial Planning Statement. The proposal creates a lot in a rural area, which is permitted under the PPS. The lot area has been designed to reflect the character of a typical rural lot and maintain compatibility with surrounding rural area. Lot sizing for the retained lands is adequate to support a future residential dwelling and future septic system. Future development can be adequately setback from on-site natural heritage features. The Karst Assessment by GEI Consultants Canada, did not find evidence of karst in the area of the future dwelling.

## 2.2 County of Grey Official Plan (Recolour Grey)

The subject lands are designated as a Rural area under the Grey County Official Plan (GCOP) in accordance with **Figure 6**.

There are also a number of features on and near the subject lands that are of County interest, including a Natural Heritage System Core Area (**Figure 7**), karst (**Figure 8**), significant woodlands (**Figure 9**), and bedrock drift thickness (**Figure 10**).

The analysis of all applicable Grey County Official Plan policies may be found in **Table 3** of this report.

*Table 3: County of Grey Official Plan Relevant Policy (Recolour Grey)*

<p>5.4 Rural Land Use Type</p> <p>Outside of settlement areas, the Rural land use type offers flexibility for lot creation (both agricultural and non-agricultural), economic development, tourism, residential, and recreation.</p> <p><u>5.4.3 Consent Policies</u></p> <p>1) 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. (For an Original Township Lot Size of 40 hectares, Table 9 prescribes a maximum of three severances, and a maximum number of four total lots including the severed and the retained).</p> <p>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.</p>	
<p><i>Policy Evaluation:</i></p>	<p>The proposal involves the creation of a new lot, resulting in severed lands of 0.8± hectares in area, and retained lands of 15.45± hectares in area. This would meet the minimum lot area prescribed under County Policy for lot creation in the rural lands designation. The proposed severed lot size would be similar in size and character as existing rural residential lots in the surrounding area and throughout Grey County and generally meets</p>

the frontage-to-depth ratio for non-farm sized lots.

The retained lot will have a frontage of 34.6m (113.5 ft.) which is slightly less than the 36m frontage requirements for un-serviced residential lot in the shoreline residential and settlement areas of the Township. The retained lot will not introduce a new access point. The existing access can be upgraded during the entrance permitting process. Concession Road 21 has good sight lines at this location. The parcels directly abutting the subject lands to the east and west are developed with seasonal and/or permanent dwellings and accesses. Lands to the northwest of the parcel cannot be subdivided into additional lots without exceeding the County of Grey lot density requirements. With approval of the subject consent to sever, additional lots cannot be created from the subject Original Township parcel without exceeding the County of Grey lot density requirements. The parcel directly north of the subject lands is actively farmed which is expected to continue for the foreseeable future. Lands to the northeast have already been subdivided into rural estate lots which are developed. Lands further east and northeast fall under the Niagara Escarpment Plan wherein lot development is restricted. Therefore, from a traffic safety perspective, the retained parcel will not introduce a new traffic hazard to the vicinity and it is unlikely that significant, or any, new lots will be created in the foreseeable future in the immediate area.

With respect to residential development on the retained lot, while the access point to the retained lot is somewhat narrow, there is sufficient depth and width on the remainder of the lot for a building envelope outside any natural heritage features or natural hazards. Sufficient amenity space is available on both the severed and retained lands. Should a future owner wish to build in the interior portion of the retained lands, the option to undergo an NEC development permit process is available.

It is typical for proposed rural residential lots to require relief from frontage requirements, particularly since the last County of Grey Official Plan update, which increased the number of lots permitted in the Rural

	<p>designation.</p> <p>As noted above in this report, this proposal complies with the minimum distance separation formulae.</p>
<p>5.6 Aggregate Resources Area and Mineral Resource Extraction Land Use types</p>	
<p>5.6.6 Bedrock Resource Areas and Shale Resource Areas</p> <p>Within Bedrock and Shale Resource Areas shown on Appendix E and on adjacent lands, new non-agricultural uses that require an official plan amendment on existing lots of record, or new non-farm sized lot creation, which would significantly prevent or hinder new extraction operations may only be permitted if:</p> <ul style="list-style-type: none"> <li>i. the resource use would not be feasible for extraction as per current industry standards (i.e., resources with greater than 8 m of overburden);</li> <li>ii. or the proposed land use or development serves a greater long-term public interest;</li> <li>iii. and issues of public health, public safety and environmental impact are addressed.</li> </ul>	
<p><i>Policy Evaluation:</i></p>	<p>The Letter of Opinion regarding Bedrock Resource Extraction by GEI Consultants, assessed the potential for aggregate extraction activities on the subject lands. Thickness of overburden was assessed as well as the potential location of the water table through review of MECP well records. Applicable policy and regulations were also discussed in relation to natural heritage features on and near the property.</p> <p>GEI Consultants reviewed Schedule 'C' and Appendix 'E' of the GCOP and determined that Natural Heritage System core areas are prioritized over bedrock resources in the mapping. Natural Heritage System core areas overlap with the woodlands located on the subject lands, which are extensive and cover most of the area of the subject lands. The policy states that site alteration and development is generally prohibited in core areas unless it can be demonstrated that there will be no negative impacts on the natural features and their ecological functions.</p> <p>A quarry operation would involve extensive vegetation removal, site alteration and excavation by their nature. It is therefore not practical to demonstrate that a quarry will have no negative impacts on the core area, which impacts licensing opportunities on a large area of the subject lands. The letter of opinion also noted that further risks to the environment are associated with below-water table aggregate licences. In addition, the parcel is partially designated under the</p>

Niagara Escarpment Plan, a provincial plan emphasizing the retention of a contiguous natural landscape. Two planning approval authorities would increase the difficulty of obtaining the necessary approvals for a quarry operation.

Given the size of the parcel and required operation setbacks under the ARA, the surrounding residential uses and existing natural features, licensing this location is unlikely to be feasible.

With respect to off-site impacts, the letter of opinion concluded that the proposed consent to sever would result in the potential for a minor increase in residential use at this location. Other existing residential dwellings in the area already constrain a future quarry. In light of the natural Heritage System Core Area mapping, the only significant bedrock re-sources available are to the north and east. As the severed lot will contain the existing residence and there is already existing residential use to the east, no new constraint will be introduced to an aggregate resource on a surrounding property.

7.1 Core Areas and Linkages

1) Core areas are the County's largest pockets of significant natural features, and represent the best areas for interior species habitat and natural function in the County. Grey County is home to some of the largest Core Areas remaining in Southwestern Ontario. Cores Areas are crucial to the environmental health of the County, and represent an opportunity for conservation.. Within Core Areas, the County places a priority on environmental protection.

Core Areas largely overlap portions of other significant natural features including Provincially Significant Wetlands, Areas of Natural and Scientific Interest, Other Wetlands, Significant Woodlands, Significant Valleylands, Habitat of Endangered and Threatened species, Hazard lands, and Fish Habitat

8) New non-farm sized lot creation is not permitted in Core Areas or Linkages, except for the creation of conservation lots.

7.3.1 Provincially Significant Wetlands and Significant Coastal Wetlands

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.

7.4 Significant Woodlands

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.

*Policy Evaluation:*

There are a number of natural heritage features mapped on the subject lands. However, the proposal will not be located in areas designated as a Core Area under Schedule 'C', and Significant Woodlands under Appendix 'B'.

The lot lines associated with the proposed severance will not be located in a Natural Heritage System Core Area. The Core Area on the subject lands will remain intact on the retained lands as a result of this proposal. The location and design of a future rural residential dwelling on the retained lands is not known. It is recommended that the implementing zoning by-law require a holding provision to ensure the appropriate studies/review related to natural heritage and natural hazards is completed prior to development within the holding area.

The subject lands contain a provincially significant wetland as noted above in this report. The provincially significant natural heritage feature is in the south of the subject land. The proposal, including the clearing associated with a potential future rural residential dwelling, is not located in the adjacent lands of any of this feature.

No impact on the above noted features is anticipated from this proposal.

7.2 Hazard Lands

3) In the Hazard Lands land use type buildings and structures are generally not permitted.

7.5 Karst

In areas mapped as 'Karst Area' on Appendix A, it will be necessary for the proponent of any planning application to provide an assessment of the proposed area of development. Often, this can be accomplished by on-site test holes, however in some circumstances broader land-

scape features may indicate karst and may indicate the need for further assessment/confirmation. Depending on the site and the scale of the development, an environmental impact study, Hydrogeological or Karst Study, completed by a qualified individual may be required.

*Policy Evaluation:*

There are hazard lands mapped on the subject lands, which are located in the southern area of the subject lands adjacent to Scale Lake. No new uses and no new buildings or structures will be established in or near these hazard lands as a result of this proposal.

Karst is mapped on the entire subject lands under Appendix 'A' of the GCOP.

A Scoped Karst Assessment was prepared by GEI Consultants. The area assessed included the clearing in the north of the subject lands that would contain a future rural residential dwelling. A total of five test holes were dug to a depth of up to approximately 1m below ground surface, where bedrock was encountered. No standing or moving water was found in the soils or at the soil/bedrock boundary, and no active or significant karst features were evident.

As noted previously in this report, if bedrock is encountered during construction, the bedrock surface is to be inspected in areas where it is exposed and at the locations of the proposed footings to confirm the absence of fractures or dissolution features.

The Scoped Karst Assessment also recommended that the thickness of the overburden be confirmed to ensure that Ontario Building Code requirements are met for a septic system, and that a qualified person be retained for inspection.

8.9 Services, utilities, Broadband and Other Technology Considerations

8.9.1 Services

The Provincial Policy Statement includes a number of policy considerations for servicing growth and development. This includes policies that support the use of municipal water and sewer systems and to identify situations when development can be considered using private wells and septic systems. The following are policies regarding servicing:

4. The following hierarchy of water or sanitary servicing options will be used to evaluate any development applications within the County, except where specific exclusions are made

through this Plan or where more detailed policies have been developed in a local official plan or secondary plan.

d) Individual on-site sewage services and individual on-site water services in accordance with the policies contained in Section 8.9.1.

9) In any part of the County to be serviced by individual on-site private systems, new development by way of subdivision or condominium will be subject to a Servicing Options Study in accordance with the MECP's D-5-3 Guideline or any future updates to this Guideline. Local municipalities will need to be satisfied that any new development by way of consent can be adequately serviced by individual on-site private systems if that is the proposed form of servicing.

*Policy Evaluation:*

Septic system sizing is determined based on soil percolation time and the need for sanitary waste disposal generated by a specific residential dwelling design. In the case of subsoil with inadequate percolation time, raised leaching beds are often used to reduce septic system size.

The GEI assessment determined that the substantial lot size on the retained lands and considerable size of the existing clearing does not justify the imposition of further restrictions as part of a development agreement or holding provision under the zoning by-law.

9.12 (1) Where division of land is considered, the approval authority must have regard to the policies of this Plan, the matters set out in the Planning Act, R.S.O. 1990, as amended and the following circumstances:

- a) The land division is permitted by the appropriate land use policies of Section 3 to 8;
- b) The land division is to promote development in an orderly and contiguous manner, and should not conflict with the established development pattern of the area;
- c) The proposed use is compatible with existing and future permitted land uses on adjacent lands;
- d) The servicing requirements of Section 8.9 must be met;
- e) Direct access from a Provincial Highway or a County road may be restricted as outlined in Section 8.3. Where possible, residential lots must not be approved where access from a road would create a traffic hazard because of limited sight lines, curves, or grades;
- f) Evidence that soil and drainage conditions are suitable to permit the proper siting of buildings, that a sufficient and potable water supply exists, and that conditions are suitable for sewage system construction;
- g) The size of any parcel of land created must be appropriate for the proposed use, and in no case, will any parcel be created which does not conform to the minimum provisions of the zoning by-law.

The proposed lots comply with Provincial Minimum Distance Separation Formulae except for lots created within settlement areas.

*Policy Evaluation:*

The proposal is evaluated with respect to Section 9.12(1) as follows:  
 The proposed consent to sever appears to meet the intent of the applicable policies of the Rural area in the Grey County Official Plan, as per the policy analysis throughout this report. The proposal does not substantially change the development pattern of the area of woodland, agriculture, and rural residential dwellings on existing lot sizes comparable to the proposed severed lot size.

The severed and retained lands will be used for a rural residential non-farm dwelling, as permitted under the GCOP on rural lands. The applicable policies of Section 8.9 of the GCOP are assessed in this table. Direct access to both the severed and retained lands will be provided by means of existing entrances onto Concession Road 21, which is a year-round municipally maintained public roadway. This public road is paved. The road is straight with a 400 m sight distance in either direction. As discussed in this report with respect to the Karst Assessment, no evidence of karst was found as a result of on-site test pitting.

The proposed severed lot will be 0.8 hectares, which meets the minimum prescribed under both the GCOP and the Georgian Bluffs Zoning By-law. Minimum distance separation calculations were prepared and it was determined that a minimum distance of 185 m is required from the livestock barn to the nearest portion of the severed lands, whereas a distance of 252 m will be provided.

In summary, this proposal conforms to all applicable policies of the Grey County Official Plan. The proposed number of lots, post-development, will not exceed the maximum number of four permitted lots for a 40ha± original township parcel in the rural area.

While the retained lands will exceed the maximum permitted ratio of lot frontage to depth of 1:3, this can be rectified in the amending zoning by-law.

As noted in the above evaluation, a holding provision can be included in the implementing zoning by-law to ensure development on unassessed lands undergoes the appropriate natural heritage and natural hazards review.

The Letter of Opinion regarding Bedrock Resource Extraction by GEI Consultants found that a mineral aggregate operation on the subject land would largely be unfeasible, and the only area of potential that would avoid the natural heritage system core area is the portion of the lot near existing residential dwellings. It found the new residential lot to be a minor additional use that will not further constrain the local bedrock resource.

The Karst Assessment by GEI Consultants did not find evidence of karst in the area of the future dwelling.

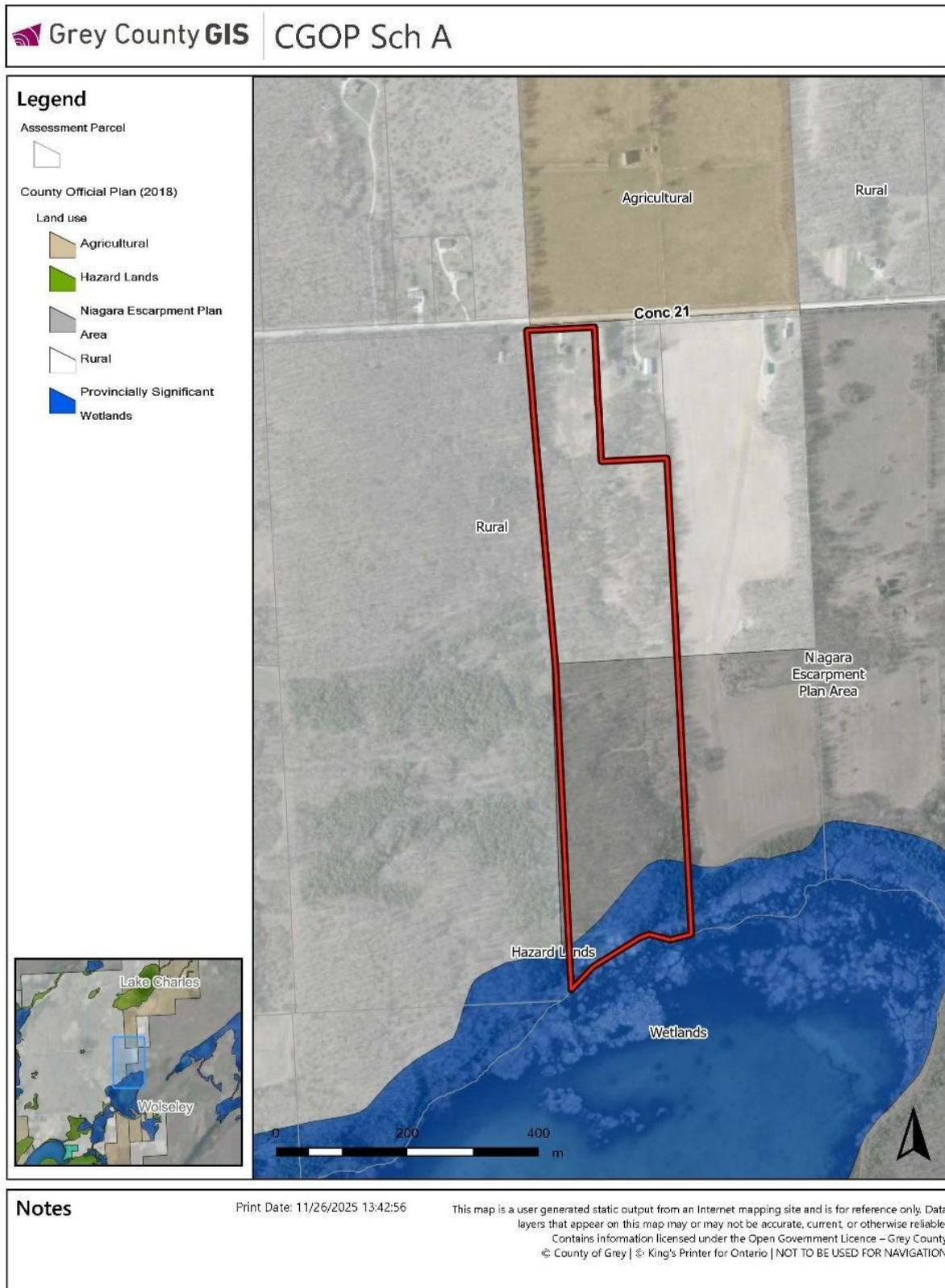


Figure 6: County of Grey Official Plan – Schedule 'A'

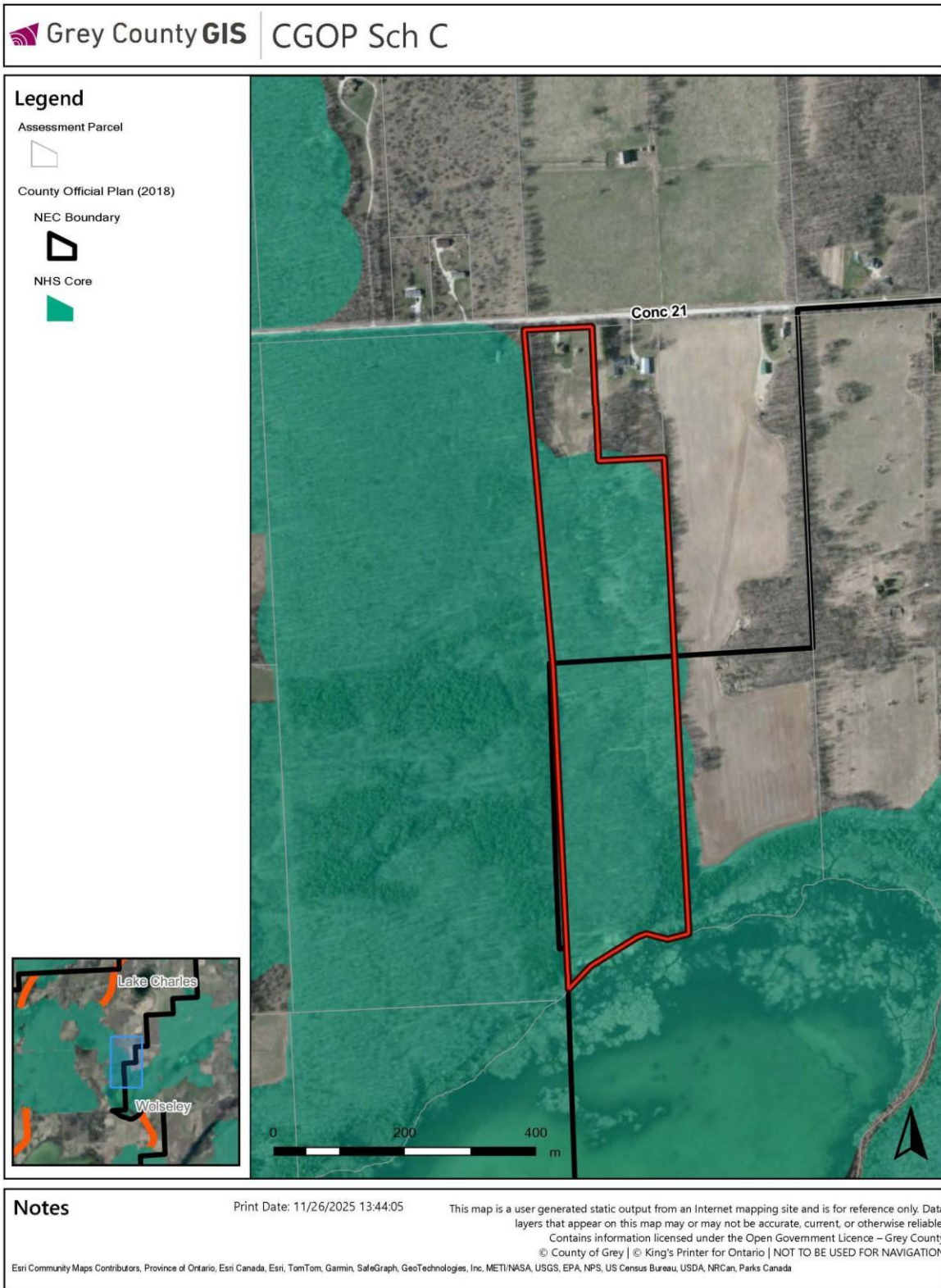


Figure 7: County of Grey Official Plan – Schedule 'C'



Figure 8: County of Grey Official Plan – Appendix 'A'



Figure 9: County of Grey Official Plan – Appendix 'B'

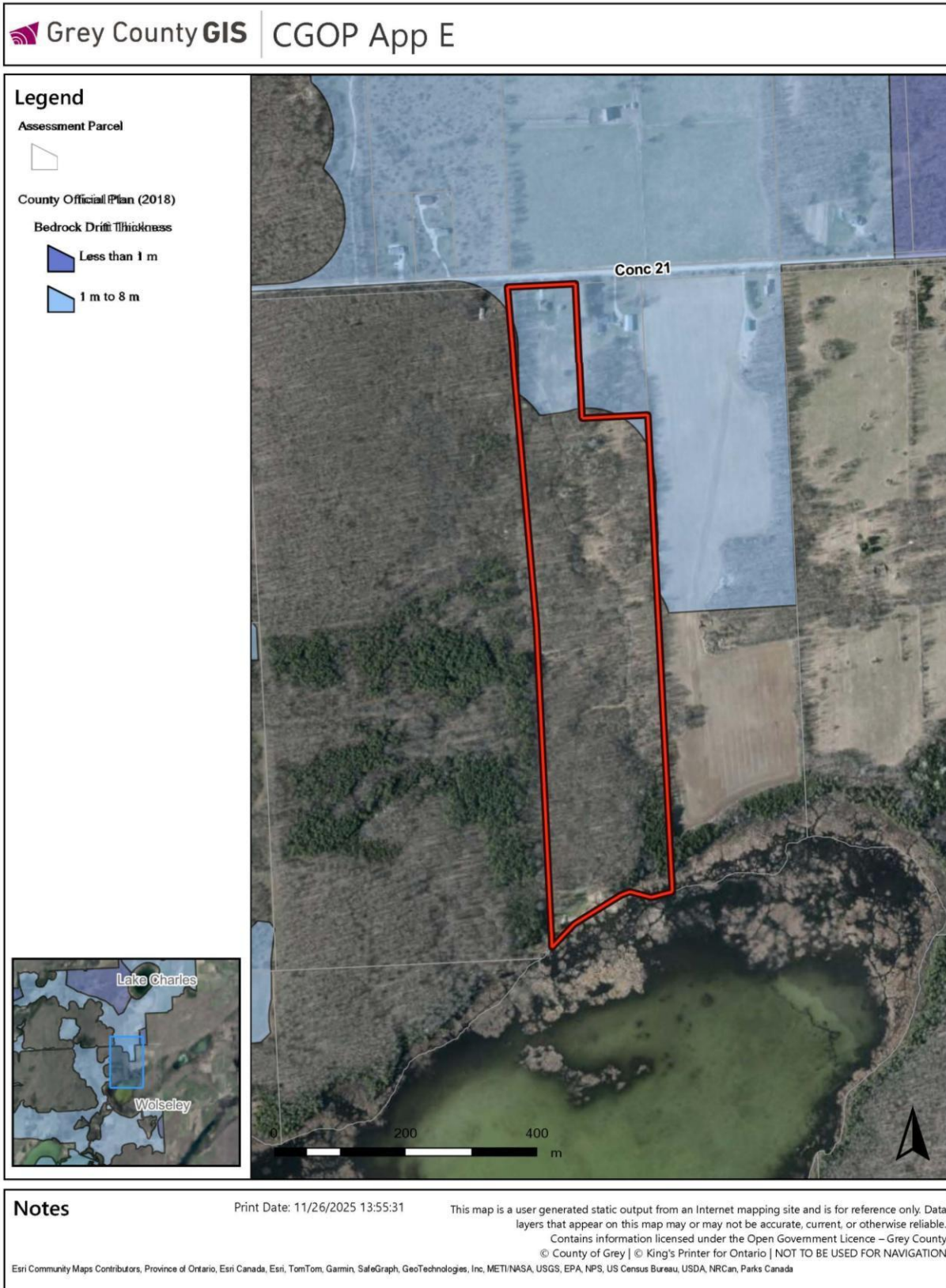


Figure 10: County of Grey Official Plan – Appendix 'E'

## 2.4 Township of Georgian Bluffs Zoning By-law, 2020-020

The northern part of the subject lands are in the Rural 'RU' Zone under Township of Georgian Bluffs Zoning By-law 2020-020. The southern part of the subject lands are subject to the Niagara Escarpment Development Control and are not regulated by the zoning by-law. See **Figure 11** for more detail.

The proposal will result in a deficient lot frontage for both the retained lot and the severed lot in the Rural 'RU' Zone. The lot frontage on the retained lot will be approximately 34.6m, whereas the lot frontage on the severed lot will be approximately 67.8m. The minimum required lot frontage in the Rural 'RU' Zone is 100m. Generally, the intent of the minimum lot frontage requirement is to ensure that lots have adequate access to the abutting right of way, and to set the minimum standard for the width of a lot. As noted earlier in this report, both proposed lots (severed and retained) have existing accesses onto Concession 21, therefore no new traffic hazard will be created by the proposal. Should the retained parcel be developed in the future, an upgrade to the existing field entrance will be required.

The majority of lots in the rural area are rectangular in shape. However, the retained lot is wider in the south in the vicinity of the clearing that is intended for the future residential use. Therefore, while a 34.6m frontage is seemingly narrow, it does not significantly affect the overall development potential of the lands. Both lots will comply with the minimum lot area policies of the zoning by-law.

Zoning on the retained lot should include a holding provision that no building or structure shall be permitted in the holding area without the appropriate natural heritage and hazard review.

An analysis of the applicable Georgian Bluffs Zoning regulations is reviewed in the table on the following page with the exceptions noted.

*Table 4: Adherence to Rural Zoning Provisions - Residential and Non-Agricultural Uses*

<b>Provisions</b>	<b>RU (Residential and Non-Agricultural Uses)</b>	<b>Adherence to Provisions (Severed)</b>	<b>Adherence to Provisions (Retained)</b>
Lot Area (Min)	0.8 ha	±0.8 ha	±15.245 ha
Lot Frontage (Min)	100 m	<b>±67.8m</b>	<b>±34.6 m</b>

Lot Coverage (Max)	10 %	±3%	To be determined
Required Yards (Min)			
Front Yard	10 m	±21.1 m	TBD
Exterior Side Yard	15 m	n/a	n/a
Rear Yard	10 m	±63.2 m	TBD
Interior Side Yard (Min)	10 m	±10 m (west) ±20 m (east)	TBD
Building Height (Max)	10 m	Existing	TBD
Max Distance for building/ structure from Con 21	n/a	n/a	210 m

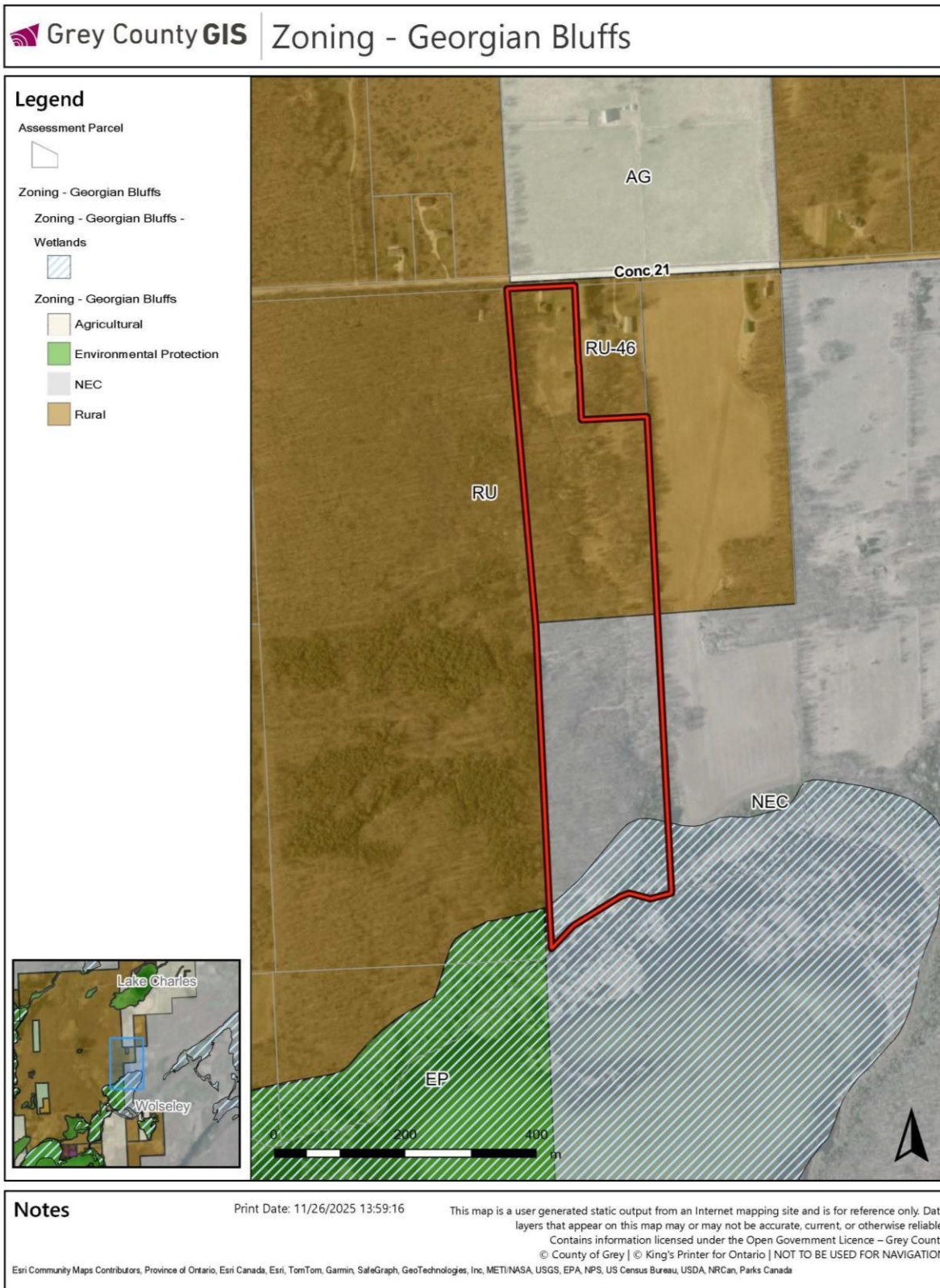


Figure 11: Township of Georgian Bluffs Zoning

### 3.0 SUMMARY & CONCLUSIONS

The proposed zoning by-law amendment and consent to sever applications will create a non-farm sized rural residential lot. The only outstanding issues would be with respect to potential impacts of future construction on natural heritage features and the presence of karst. This concern can be appropriately addressed by a maximum development distance from Concession 21 in the implementing zoning by-law, and through the recommendations of the karst assessment.

In consideration of the forgoing, the following is concluded:

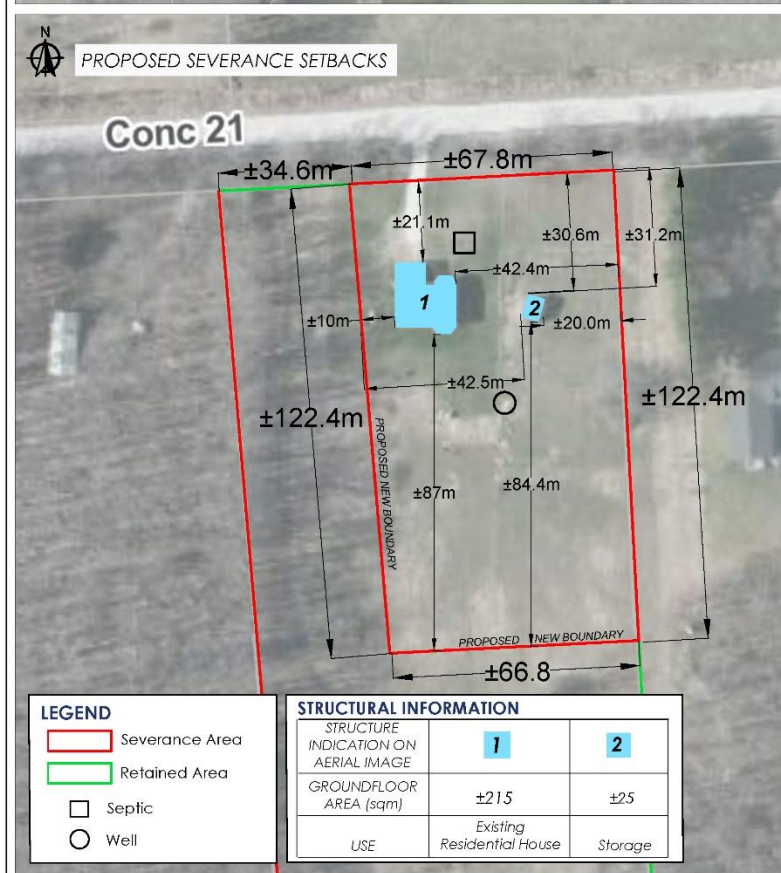
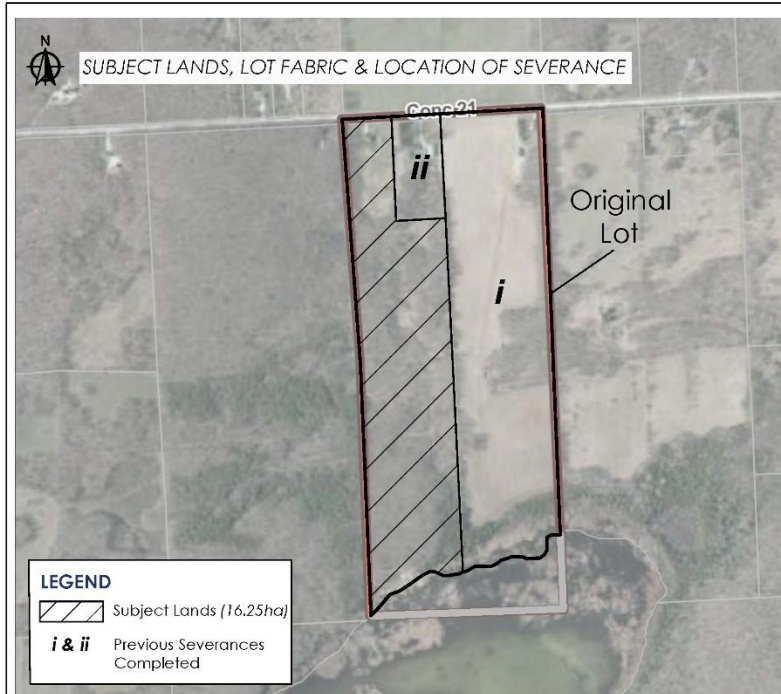
1. The proposed lot creation is consistent with the Provincial Planning Statement which permits a limited amount of non farm residential development in a Rural area subject to appropriate water and sewage systems;
2. The proposal does not impact bedrock resources or the natural heritage features on the subject property;
3. The proposal meets the intent of the Grey County Official Plan, as it satisfies the lot density and lot size prescribed for Rural Areas;
4. The suggested frontage to depth ratio is met by the proposed severed lot and the retained lot is appropriate in consideration of previous consent activity;
5. The implementing zoning by-law can reflect the necessary relief from the rural 'RU' zone provisions as well as providing a restriction on new structures on the retained lot to safeguard natural features on the southern sections of the retained lot;
6. The proposal complies with rural lot creation policies of the GCOP; and,
7. The proposal reflects appropriate rural planning principles.

Respectfully submitted,

  
Genevieve Scott, MCIP, RPP

## APPENDIX A

### SITE PLAN



**CONSULTANT**

# Cuesta

PLANNING CONSULTANTS INC.

A. 978 First Avenue West  
Owen Sound,  
ON N4K 4K5  
T. (519) 372-9790  
E. cpo@cuestaconsulting.com

Drawn by: J Bruwer  
Date printed: June 19, 2026

Project File No: 25023  
Project name: T. Fletcher

SIZE: A3

**ADDRESS & LEGAL DESCRIPTION**

420362000605800  
442538 Concession 21  
CON 21 W PT LOT 23 LESS: RP16R8085 PART 1  
Township of Georgian Bluffs, County of Grey



**CONSULTANT**

# Cuesta

PLANNING CONSULTANTS INC.

A. 978 First Avenue West  
Owen Sound,  
ON N4K 4K5  
T. (519) 372-9790  
E. cpo@cuestaconsulting.com

Drawn by: J Bruwer  
Date printed: June 19, 2026

Project File No: 25023  
Project name: T. Fletcher

SIZE: A3

## APPENDIX B

### MDS CALCULATIONS

## MDS I

## General information


## Application date

Dec 17, 2025

## Municipal file number

## Proposed application

Lot creation for a maximum of three non-agricultural use lots

Applicant contact information 

ON

## Location of subject lands


County of Grey  
Township of Georgian Bluffs  
KEPPEL  
Concession 21 , Lot 23  
Roll number: 4203

## Notes

442538 Concession 21

## Calculations

## New non-farm lot

Farm contact information 

ON

Location of existing livestock facility or anaerobic digester  
 County of Grey  
 Township of Georgian Bluffs  
 KEPPEL  
 Concession 22 , Lot 23  
 Roll number: 4203

Total lot size  
 42.22 ha

Notes

442549 Concession 21

Livestock/manure summary

Manure Form	Type of livestock/manure	Existing maximum number	Existing maximum number ( NU)	Estimated livestock barn area
Liquid	Unoccupied Livestock Barn	250 m <sup>2</sup>	12.5 NU	250 m <sup>2</sup>



Confirm Livestock/Manure Information (New non-farm lot)

The livestock/manure information has not been confirmed with the property owner and/or farm operator.



Unoccupied Barn or Unused Storage (New non-farm lot)

The calculated setback is based on assumptions for an unoccupied barn or unused storage that may not reflect the actual design capacity.

Setback summary

Existing manure storage	- Not Specified -		
Design capacity	12.5 NU		
Potential design capacity	25 NU		
Factor A (odour potential)	1	Factor B (design capacity)	210
Factor D (manure type)	0.8	Factor E (encroaching land use)	1.1
Building base distance 'F' (A x B x D x E) (minimum distance from livestock barn)			185 m (607 ft)
Actual distance from livestock barn			252 m (827 ft)
Storage base distance 'S' (minimum distance from manure storage)			No existing manure storage
Actual distance from manure storage			NA

Preparer signoff & disclaimer

Preparer contact information

ON

Signature of preparer

Nikolas Kohek

---

December 17, 2025

---

Date (mmm-dd-yyyy)

**Note to the user**

The Ontario Ministry of Agriculture, Food and Agribusiness (OMAFRA) has developed this software program for distribution and use with the Minimum Distance Separation (MDS) Formulae as a public service to assist farmers, consultants, and the general public. This version of the software distributed by OMAFA will be considered to be the official version for purposes of calculating MDS. OMAFA is not responsible for errors due to inaccurate or incorrect data or information; mistakes in calculation; errors arising out of modification of the software, or errors arising out of incorrect inputting of data. All data and calculations should be verified before acting on them.

© King's Printer for Ontario, 2012-25