

June 2nd, 2026

Cassandra Dillman, Intermediate Planner

County of Grey

RE: Response to County Planning comments dated May 5th, 2026 In Regard to Application B09.2026 Georgian Bluffs

The Township of Georgian Bluffs provided myself, as agent for the applicants, a copy of the comments received from the County of Grey Planning staff. We wish to provide and discuss information which we believe will resolve the concerns expressed.

As noted the Province has established a set of policies within the PPS. These policies must be considered in any proposal for land use, as well as other legislation. The PPS policies include the protection of agricultural lands as well as lands containing significant environmental features and mineral resources. This proposal will have no negative impact upon any significant natural area.

The County of Grey Official Plan and its policies must also be considered against the competing interests of various and often overlapping land uses.

The County staff have questions in regard to the appropriateness of the proposal in regard to agricultural policy and mineral or bedrock resources. We will focus on resolving these concerns and the discussion centers on how to achieve the intent of both documents.

1.0 Agricultural Use

The lands are designated 'Agricultural' within the county plan. Lot adjustments can be made within this designation for technical reasons. Technical can be defined as having special and usually practical knowledge, often used in regards to mechanical or scientific subjects, or marked by or characteristic of a specialization.

The proposal is to merge existing agricultural land with abutting agricultural land and retain a smaller acreage containing the existing dwelling, barn and few acres. The proposed retained parcel is considered by the current owner (CO) and prospective owner (PO) to be unsuitable for the current form of agriculture. The PO currently farms the lands to the north and south of these lands and has them tile drained and cleared of obstructions. While they currently farm the subject lands no improvements have been made as they do not own it. Once owned they plan to weave it into their current drainage system (tile drained fields) to improve productivity.

In addition, I have been advised that the size of equipment utilized for today's large scale form of agriculture would have difficulty maneuvering on the lands proposed to be retained due to topographic constraints and existing structures. And that this area appears



to have a higher water retention factor than the abutting lands making it more difficult to incorporate into the larger field, but suitable for the smaller hobby farm proposed.

If the lands were not able to be separated and the CO's sold the lands, there would be no assurance that the majority of the land would be utilized to its full agricultural potential. Based upon the owners knowledge of the lands and the farmers operating practices, this proposal achieves the protection of good quality agricultural lands for the long term.

The three tests for lot adjustments, or in this case lot additions, that staff identified can be addressed as follows. There is one parcel of land existing, there will be one parcel remaining after approval. The lands which will receive the addition are located directly to the south, and the farmer owns the lands to the north as well forming an efficient and cohesive agricultural operation. The lands forming the lot addition are already farmed, albeit without improvements, and the portion to be retained already contains a hobby farm use (dwelling, workshop, barn and pasture for sheep). This proposal is minor in nature as 1. it serves to meet the policy to protect agricultural lands for the long term, consistent with the PPS and intent of the County OP, 2. does not represent a change of use, and 3. retains an existing dwelling on a parcel able to sustain the use in the long term and continue the hobby farm use in an environmentally sound manner. The parcel was kept to the smallest size to allow the most amount of good quality land to be utilized for farming while allowing for the continuation of the hobby farm use. The retained lands could be larger if that were desired however with their knowledge of the land characteristics the proponent (CO) and farmer (PO) have chosen this size as the most desirable.

2.0 Residential Dwelling

The PO do not wish to be landlords, hence have no need for the dwelling. The existing dwelling is in very good condition, the CO wish to continue to live there. It is not uncommon when lands are acquired for farming purposes that existing dwellings are removed or abandoned.

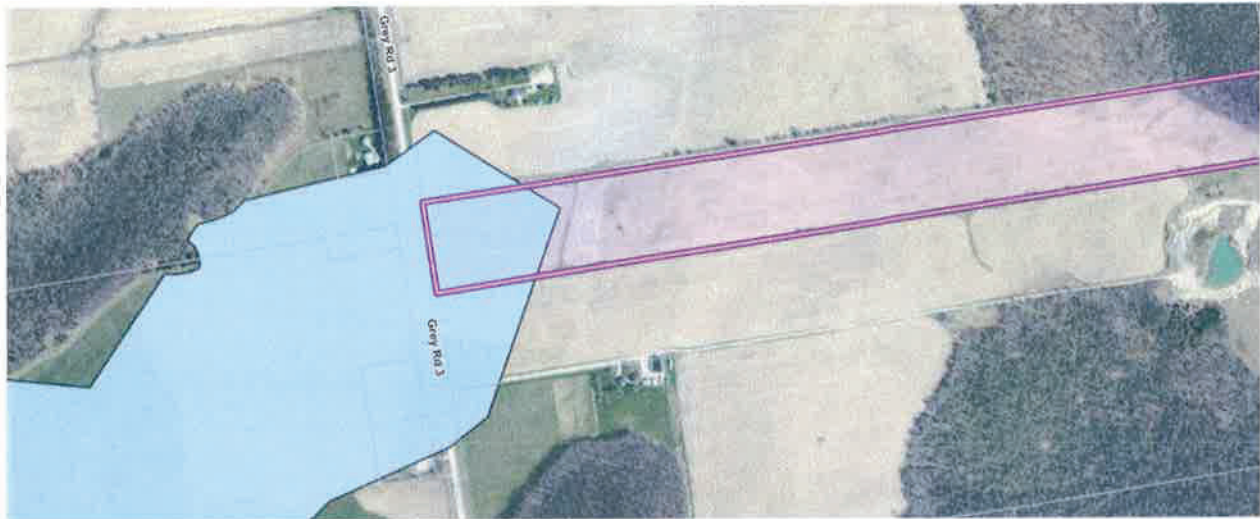
The Province has passed legislation supporting the creation, retention and increased density of housing (*Cutting Red Tape to Build More Homes Act, 2024*). Retaining this dwelling serves to sustain a viable housing unit and the proposed retained lands provide a separation from the active field which will ensure that there is no appreciable impact or conflict between the dwelling/hobby farm and the more intense agricultural activity.

3.0 Bedrock Resource

Appendix E of the County of Grey Official Plan shows mapping of a 'Bedrock Drift Thickness' (thickness potential 1 to 8 m), or mineral resource, in proximity to the subject lands, Map 1 below. The mapping identifies where these resources may exist and can be used to predict where to protect this resource for future access, allowing development only where accessing the resource would not be feasible. Extraction activities are subject to the Aggregate Resources Act R.S.O. 1990 (ARA) regulations.



Map 1



The ARA controls the approval and operations of extraction activity through a system of licence and permits. The ARA affects the placement and operations within pits and quarries, ie separation from natural areas, residential uses and minimum setbacks from sensitive uses. The ARA does not permit excavation within 30 metres from any part of the boundary of a site adjacent to a highway, from residentially used or zoned lands or from any body of water that is not a result of an excavation. A quarry may have a licence for extraction above the water table, requiring a minimum 2 metre separation, or below the water table. Below the water table is a more complicated licence.

In the initial review of policies affecting the proposal several factors were identified, specifically:

- a. Including the dwelling on the subject lands there are atleast three dwellings in close proximity, and three more which could be affected and pose a land use conflict (Map 2);
- b. The County Highways may not be supportive of a quarry entrance in this area of their road;
- c. The CO advised that water often sat on the fields adjacent to the barn/dwelling for quite some time in the spring and their experience was that the lands often remained quite wet into the summer months; and
- d. the area shown for the resource was limited in size making feasibility questionable.



Map 2



For those reasons feasibility of the 'Bedrock' resource was significantly limited and thus not anticipated to be a factor in consideration of the proposal. This information and assessment should have been included in the initial justification document. My apologies for not doing so.

The County has asked that a qualified engineer provide a 'letter of opinion' in regard to this matter, the Owner is currently looking into acquiring this service.

4.0 Section 5.6.6 County OP

Section 5.6.6 3)	Demonstrate the appropriateness of the land area to be severed (ie. Land need, boundary error, servicing, parking, etc.)	The lot addition would result in the more productive use of the agricultural land in the long term.
	Demonstrate that the outcomes of the lot addition will not unduly impact future resource extraction, both from an availability of land and potential land use conflict.	The resource is limited in availability now due to setback requirements and this proposal will not change that. An engineers' report may provide confirmation of this.
	Demonstrate the need for the lot addition.	The agricultural lands can be better utilized as part of the existing drainage system and the dwelling can be retained for future use.
	Demonstrate that the policies of section 5 of this Plan are addressed.	In appearance the lands will look and function the same, nothing new. The lands to be retained could be increased in size, however that seems to be counter to the objective to protect and utilize as much quality farmland as possible.



		The hobby farm acreage would serve several purposes, including providing a buffer to reduce potential conflicts and continuing the rural way of life.
	To explain the hardship imposed by not permitting the severance.	The farmer may not wish to retain the existing dwelling, even though it is in good condition. The current owners find the home easily accessible and the hobby farm/workshop improves their life. The lands will not be better utilized.

The question arises then as to which use of land is the best and most appropriate, for the long term. While a bedrock resource is shown under a portion of the lands, the feasibility of extraction appears limited. This will be confirmed or negated by the engineers assessment. The surrounding agricultural use of abutting lands, and addition of the lot addition portion of the subject lands would increase the productivity and connectivity of farmland into the future. The retention of the existing dwelling on a hobby farm parcel would allow the continued use of existing housing stock, barn and provide buffers to avoid potential conflicts in the future. County Natural Heritage comments raised no concern. County Transportation comments raised no concern.

The proposal would not result in an additional lot. The proposed use of both parcels is agricultural – albeit on two different scales. The use of the existing dwelling would provide a housing option now and in the future. We believe that the proposal is consistent with the provincial policy and satisfies the intent of the County policies.

Respectfully submitted,

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