



RON DAVIDSON
LAND USE PLANNING CONSULTANT INC.

October 21, 2019

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

Attention: Jennifer Burnett, Intermediate Planner

Dear Jennifer:

**Re: Proposed Plan of Subdivision
Part of Lot 9, Concession 7
(Part Lots 71, 75 and 76, Lots 72, 73, 74, 85, 86 and 87, and Part of
unnamed street, Plan 117)
Geographic Township of Derby
Township of Georgian Bluffs
Owner/ applicant: Barry's Construction & Insulation Ltd.**

In response to the comments provided by the City of Owen Sound with regard to the above-noted development, I offer the following:

Section 1.6.6 *Sewage, Water and Stormwater* of the Provincial Policy Statement (PPS) gives consideration to new development serviced with individual private septic systems and private wells where municipal or communal services are not available provided that site conditions are suitable for the long-term provisions of such services with no negative impacts. The PPS also states that such private services may only be used for *"infilling and minor rounding out of existing development"*.

In this regard, GM BluePlan Engineering conducted a Site Servicing Options Review in accordance with the Ministry of the Environment, Conservation and Parks D-5-3 Guideline which determined that servicing the proposed 33-lot subdivision with municipal or communal services is not feasible. GM BluePlan Engineering also prepared a Hydrogeological Report and Functional Servicing Report which collectively addressed the site's availability of drinking water and undertook a nitrate review pertaining to the appropriateness of the property for individual septic systems as per the D-5-4 and D-5-5 Guidelines. These reports determined that the site

conditions are suitable for a private septic system and well on each individual lot. The report has also determined the appropriate lot size for parcels with this subdivision. As you're well aware, these reports have been peer reviewed on behalf of the Township and County.

With regard to the City's comment about whether or not the proposed development qualifies as "*infilling and minor rounding out of existing development*", it is my opinion that the intended subdivision does indeed meet this criterion; and, such opinion appears to be shared by Township Council, County Council, and the Province, and presumably Planning staff at all three levels of Government as well. I make this statement for the following reasons:

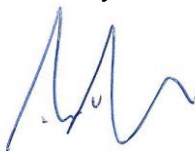
First of all, the development is relatively minor in scale, as it involves only 33 residential lots.

Secondly, neither the new County of Grey Official Plan nor the previous version of the Official Plan (which was in effect when the Planning Act applications were filed with the County and Township respectively) contains policies that would prohibit a subdivision of this size in Kilsyth; and, it's important to note that both Official Plans were approved by the Province, with the latest Official Plan being approved under the latest version (2014) of the Provincial Policy Statement (PPS). In order to approve the Official Plans, the Province must have been satisfied that these documents are consistent with the PPS.

In a similar manner, the policies of the Township of Georgian Bluffs Official Plan specifically acknowledge Kilsyth as a settlement area that will be serviced with private, individual water and sewage systems; and, the policies make no attempt to prohibit development by way of Plans of Subdivision or to limit the size or the subdivisions, presumably based on the fact that any development within this settlement area would constitute a minor rounding out of existing development.

I trust this information will be of assistance. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ron Davidson', with a stylized flourish at the end.

Ron Davidson, BES, RPP, MCIP

c.c. Stuart Doyle (Barry's Construction & Insulation Ltd.)