

April 9, 2025

County of Hastings
235 Pinnacle St., P.O. Bag 4400
Belleville ON K8N 3A9

The Municipality of Hastings Highlands
33011 Hwy 62N
P.O. Box 130
Maynooth, ON K0L 2S0

Attn: Jason Budd and John Jardine

Re: York River Orchard Plan of Subdivision
Applications for Official Plan Amendment, Zoning By-law Amendment and Plan of Subdivision
Woodcox Road and Glory Road, Municipality of Hastings Highlands, County of Hastings
EcoVue Project No.: 20-2032

Dear Jason and John,

Since our original submission and response to comments regarding the above-noted applications, the Province has released the new Provincial Planning Statement (2024). Accordingly, we are providing this addendum to address the updated policies and to demonstrate that the proposed subdivision remains consistent with the new PPS. Additionally, we have included updated information to clarify aspects of the application for the Municipality of Hastings Highlands, reflecting revisions made in response to peer review comments on the subdivision proposal.

1.0 DESCRIPTION OF PROPOSAL

The applicant is proposing a 20-lot plan of subdivision that includes four (4) blocks:

- **Block A** is approximately 4.13 hectares and will contain open space, recreational amenities, and stormwater management facilities.
- **Block B** is 1.60 hectares and is intended for open space and recreational use.
- **Block C** comprises the proposed right-of-way and will cover 1.36 hectares.
- **Block D** is 0.06 hectares and is designated for stormwater management.

Each of the 20 lots will accommodate a single detached dwelling, with lot sizes ranging from 4,000 to 8,527 square metres. The proposed lot layout is illustrated in *Appendix A*.

The subject lands are designated Rural and Waterfront in the *County of Hastings Official Plan (CHOP)* and are zoned Marginal Agriculture (MA) and Flood Plain (FL) under the *Hastings Highlands Zoning By-law*. While multi-lot development is permitted within the Rural and Waterfront designations, the CHOP requires a minimum lot size of 0.8 hectares (2 acres). Additionally, lots without direct water access—classified as back lots—must be at least 6 hectares (15 acres).

Therefore, an Official Plan Amendment (OPA) is required to redesignate the lands with a site-specific policy that would permit the proposed lot sizes within the subdivision.

A Zoning By-law Amendment (ZBA) is also required to rezone the site from the MA Zone to a Rural Residential (RR) Zone to accommodate the proposed residential lots.

2.0 PLANNING ACT

In our original Planning Justification Report, reference was made to the *Planning Act*. Specifically, Section 2.0 (m) addressed the Municipality of Hastings Highlands Site Plan Control By-law. It is our understanding that this By-law has been updated since the time of our submission. Accordingly, Section 2.0 (m) is revised to state:

The proposed development is exempt from Site Plan Control, in accordance with the Municipality of Hasting Highlands Site Plan Control By-law 25-012.

3.0 PROVINCIAL PLANNING STATEMENT (PPS) 2024

The new Provincial Planning Statement, 2024 came into effect on October 20, 2024, replacing both the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020. This consolidated document provides updated policy direction on matters of provincial interest related to land use planning. Issued under Section 3 of the Planning Act, the PPS requires that all decisions affecting planning matters “shall be consistent with” the policies set out in the statement. The relevant policies of the 2024 PPS have been considered in the review of this planning application.

3.1. Building Homes, Sustaining Strong and Competitive Communities

Chapter 2 of the PPS contains policies designed to build strong and healthy communities in the Province of Ontario. According to Section 2.1.4 (Planning for People and Homes) of the PPS:

To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:

- a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and*
- b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.*

Furthermore, Section 2.1.6 a) states that: “[p]lanning authorities should support the achievement of complete communities by: a) accommodating an appropriate range and mix of land uses, housing options, [...]”. Looking at how the PPS defines the term “housing options”, it states:

Housing options: *means a range of housing types such as, but not limited to single-detached, semidetached, rowhouses, townhouses, stacked townhouses, multiplexes, additional residential units, tiny homes, laneway housing, garden suites, rooming houses and multi-residential buildings, including low-and mid-rise apartments [...]*

The proposed development will support the Municipality and County in achieving the objectives outlined in the PPS. The plan of subdivision will introduce additional rural dwelling units designed to offer alternative and sustainable housing options for residents of Hastings Highlands.

3.2. Rural Areas in Municipalities

As mentioned, the subject lands are not located within a settlement area and are therefore subject to Section 2. (Rural Areas in Municipalities) of the PPS. It is stated in this Section that “*healthy, integrated and viable rural areas should be supported by (a) building upon rural character and leveraging rural amenities and assets*”. The residential lots within the subdivision will reflect the character of other limited residential developments along Woodcox and Glory Roads, maintaining

consistency with the surrounding area. Additionally, the proposed development will take advantage of rural amenities, including ample space for crop cultivation and access to the York River. Based on these considerations, we believe the proposed Plan of Subdivision aligns with the objectives outlined in Section 2.5.1 of the Provincial Policy Statement (PPS).

3.3. Rural Lands in Municipalities

Section 2.6.1 of the PPS speaks to rural lands within municipalities. It is stated in Section 2.6.1 that the permitted uses within the rural lands shall include (**bold emphasis added**):

- a) the management or use of resources;*
- b) **resource-based recreational uses (including recreational dwellings not intended as permanent residences);***
- c) **residential development, including lot creation, where site conditions are suitable for the provision of appropriate sewage and water services;***
- d) agricultural uses, agriculture-related uses, on-farm diversified uses and normal farm practices, in accordance with provincial standards;*
- e) home occupations and home industries;*
- f) cemeteries; and*
- g) other rural land uses.*

The proposed subdivision is classified as a resource-based recreational use, as the lots will have access to the York River via a common-element water access block. Additionally, residential development is permitted in rural lands, provided the site conditions are suitable for sewage and water services. As outlined in the supporting technical studies and summarized below, the site can safely accommodate private individual septic systems and wells that will serve each lot. The proposed lot sizes and character will also be consistent with the surrounding rural area. As such, the proposed Plan of Subdivision is consistent with Section 2.6.1 of the PPS.

3.4. Sewage, Water and Stormwater Policies

Policies related to Sewage, Water and Stormwater are found in Section 3.6 of the PPS. Section 3.6.4 states that:

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 onsite 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 [...]

A hydrogeological assessment was completed by Cambium Inc., which confirmed that the wells can sustain the proposed residential demand without negatively impacting the quality or quantity of on-site and off-site groundwater resources. The study noted some minor water quality concerns, but it concluded that the groundwater can be adequately treated with water treatment systems within each dwelling. It is anticipated that water treatment requirements will be included in the future subdivision agreement. Additionally, the hydrogeological assessment determined that the subject lands can accommodate septic systems for each lot.

3.5. Natural Heritage

Section 4 of the Provincial Policy Statement (PPS) requires the protection of natural features and areas for the long term, stating that development and site alteration are not permitted within significant natural areas or the significant habitat of endangered and threatened species.

To assess the natural heritage features on the property and identify mitigative measures to prevent negative impacts from the proposed development, Cambium Inc. conducted an Environmental Impact Study (EIS).

The EIS identified a wetland feature and three areas of seeps on the subject property. In response, a 30-meter buffer from the wetland and a 15-meter buffer from each of the seeps were recommended, ensuring no adverse effects on these natural features. These buffers have been incorporated into the draft plan.

Furthermore, potential habitat for species at risk was also identified on the property. The recommended buffers, combined with on-site mitigation measures to be implemented during construction, will safeguard these species from any negative impacts of the proposed development.

Therefore, the proposed development aligns with Section 4 of the PPS and will not result in any negative impacts on natural heritage features.

3.6. Cultural Heritage and Archaeology

Section 4.6 of the PPS states *“planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved.”*

At the time of our initial submission, an archaeological assessment was not required to support the development. However, since then, the County has requested that an assessment be undertaken. As a result, a Stage 1 and Stage 2 Archaeological Assessment was completed. No artifacts or other archaeological resources were discovered, and assessment does not recommend any further study of the subject lands.

3.7. Natural and Human Made Hazards

Chapter 5 of the PPS address developments that occur within natural and human-made hazards. Section 5.2.2 states that *“[d]evelopment shall generally be directed to areas outside of:*

- a) hazardous lands adjacent to the shorelines of the Great Lakes –St. Lawrence River System and large inland lakes which are impacted by flooding hazards, erosion hazards and/or dynamic beach hazards;*
- 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.”*

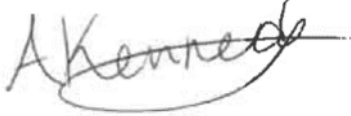
The subject property contains a floodplain along the shores of the York River. As noted in our previous submissions, no development is proposed within the floodplain area. Additionally, there is no evidence of any human-made hazards on the site. Therefore, the proposed residential development is consistent with the policies outlined in Chapter 5 of the Provincial Policy Statement (PPS).

4.0 SUMMARY

We trust that this addendum adequately addresses the outstanding policy concerns in relation to the updated Provincial policy requirements. Should you require any further information or assistance, please do not hesitate to contact the undersigned.

Respectfully submitted,

ECOVUE CONSULTING SERVICES INC.

A handwritten signature in dark ink, appearing to read "Ashlyn Kennedy", written over a horizontal line.

Ashlyn Kennedy B.E.S MCIP, RPP
Intermediate Planner