



November 26, 2025

Project No: 22028

Township of Melancthon
157101 Highway 10
Melancthon, Ontario
L9V 2E6

Re: **Planning Justification Addendum/Response to Submission #1 Comments
Draft Plan of Subdivision
537086 Main Street, Horning's Mills, Township of Melancthon**

GSP Group received a Memorandum from the Township of Melancthon dated January 17th, 2025, that contained comprehensive comments from the initial submission as it relates to the Draft Plan of Subdivision (the “**Proposed Development**”) submitted for the property located at 537086 Main Street in Horning’s Mills, in the Township of Melancthon and within the County of Dufferin (the “**Site**”).

We are writing to address those comments in the following response letter. This letter will also serve as a Planning Addendum to the original Planning Justification Report prepared by GSP Group dated July 2024.

Township of Melancthon, Planning and Development, January 17, 2025

Comment #1:

The applicant shall include reference to the County Council adopted Official Plan (2024) in the Planning Justification Report (PJR).

Comment #1 Response

Please accept the following as an addendum to our original Planning Justification Report and further reference and justification on how the Proposed Development and Application conforms to the County Council adopted Official Plan (2024).

Community Settlement Areas

The Site is located within the Countryside Area and within the Community Settlement Area of Horning’s Mills according to Schedule B – Community Structure of the County of Dufferin Official Plan. According to the County of Dufferin Official Plan, Community Settlement

Areas include small villages and rural hamlets. These areas will have limited growth through infilling and development of vacant lands. As per Section 3.3.3 of the County Official Plan, limited growth will occur through consents or plans of subdivision. The range of permitted uses and associated land uses policies will be established in the local municipal official plans.

In consistency with the County Official Plan, the Proposed Development will provide an opportunity for residential intensification in an area identified for growth. The proposal will not require the development of municipal servicing as the plan of subdivision can be serviced with individual services.

Housing and Affordability

As per Policy 3.7.1.1 of the County Official Plan, local municipalities should plan for an appropriate range of housing sizes, types, tenures and densities to meet projected requirements of current and future residents of Dufferin County.

The Proposed Development will contribute to the overall supply of housing available in the County and Township and assist the municipalities in meeting their projected targets. Furthermore, residential intensification within a rural area is typically associated with more affordable prices than urban areas.

Community Design

Policy 3.9.1 of the County Official Plan states the local municipalities are to maintain and improve the physical design characteristics of the community settlement areas in the context of new and existing development and promote a high quality of community design.

Urban Design Guidelines for the Proposed Development focus on new neighbourhood design; outlines public realm guidelines for streets; provides guidelines for site level considerations for lot types; street relationship, and garage configurations; provides general architectural directions for new buildings; and provides general landscape design guidelines for key landscape features.

Mineral Aggregate Resource Areas

The Site is located within a Sand and Gravel Resource Area on Schedule D of the Official Plan. As per Section 4.4.2 of the Official Plan, one of the objectives in the management of mineral and mineral aggregates resources is to protect these resources.

An ARA was prepared by Cambium Inc. that concluded the Site was not feasible for development as an extractive aggregate operation; therefore, the proposed residential development would be deemed an acceptable use of the land. The peer reviewer for the Township of Melancthon, Stovel and Associates, also concluded that the establishment of

a mineral aggregate operation on the Site would not be feasible. The poor quality of the subsurface materials renders the Site unsuitable for aggregate extraction.

Cultural Heritage

Section 4.4.6 of the Official Plan states development shall not be permitted on lands containing archaeological resources or areas of archaeological potential unless significant archaeological resources have been conserved.

A Stage 1 and 2 Archaeological Assessment prepared for the Site concluded there was nothing on Site that would have Cultural Heritage Value or Interest.

Natural Heritage

There is a small portion of the Site that is designated “Woodlands” according to Schedule E of the County Official Plan. The objective of Section 5.0 of the County Official Plan is to protect and restore natural resources that are of importance to the County.

The deciduous woodland identified in the southwest corner of the Site has potential to provide maternity roost habitat for SAR bats. The woodland will be retained post-development and a 10-metre setback will be applied. Therefore, there will be no direct impacts to the woodland or potential SAR bat habitat. There is also a meadow marsh in the north-west corner of the Site that will not be impacted by the Proposed Development. A minimum setback of 5 metres is proposed from the limit of disturbance associated with the SWM Pond as it relates to the meadow marsh. The EIS prepared for the Site concluded that the Proposed Development is not expected to negatively impact the ecological functions of the identified natural features if the appropriate mitigation measures are applied. Based on these findings, the Proposed Development conforms to policies of the Official Plan.

Sewage and Water Systems

Section 7.3 of the County of Dufferin Official Plan contains a servicing hierarchy as outlined in Policy 7.3.1.2 that municipal sewage services and municipal water services are the preferred form of servicing for settlement areas. However, where services are not available, where municipal sewage and water or private communal sewage services and private communal water services are not available, individual on-site sewage and water services may be used provided site conditions are suitable for the long-term provision of such services with no negative impacts.

The Proposed Development will be serviced with a private water well on each lot. Each proposed lot will be equipped with individual private septic systems to provide wastewater treatment. The Functional Servicing Report prepared for the Site concluded the Proposed Development is feasible in terms of servicing each lot with individual private systems without negative impacts.

Summary

Based on the reasons provided above, it is our opinion the Proposed Development conforms to the policies of the County of Dufferin Official Plan (2024).

Comment #2:

With the subject lands being in the NEC Development Permit area, the Township Zoning By-law 12-1979 is not in effect. As such, the Township has relied upon subdivisions to the west (Rutledge Heights) and east (Oldfield Court) for guidance on lot depth, width, and frontage. A comparison chart has been provided below and utilizes the average for each of the aforementioned regulations (depth, width, and frontage):

Regulations	Rutledge Heights (West Subdivision)	Oldfield Court (East Subdivision)	Carnevale (Proposed Subdivision)
<i>Lot Frontage</i>	45 m	66 m	30 m
<i>Lot Depth</i>	121 m	137 m	80 m
<i>Lot Width</i>	46 m	86 m	31 m

Through the comparison above it was determined that there are notable discrepancies in lot depth, width, and frontage between the two existing subdivisions and the proposed subdivision. It is, therefore, recommended that the subdivision layout be restructured to more accurately reflect the lot structure of the surrounding neighborhood. This, in the opinion of Township Planning staff, will create a more complete, harmonious community.

Comment #2 Response

In response to the Township's comment above, the Draft Plan of Subdivision has been revised to reduce the total number of residential lots from 26 to 21. The parkland block has also been removed and replaced as a lot. The lot width/frontages are more closely aligned with those found in the Rutledge Heights and Oldfield Court subdivisions to the west and the east. While we acknowledge that the proposed lots remain slightly smaller compared to the existing estate lot subdivisions, the revised layout represents a more appropriate and balanced scale that respects the established character of the surrounding neighborhood. In our opinion, this modification contributes to a more consistent community design.

Niagara Escarment Commission (NEC), January 10, 2025

Comment #1:

The current application submission has assessed the Proposed Development against the Provincial Policy Statement 2020; however, the current PPS came into effect on October 20, 2024 and must be applied to any planning application decisions made on or after the date. The Planning Justification Report, dated July 2024, should

be revised to consider how the Proposed Development meets the policies of the current PPS including but not limited to Sections: 2.1 Planning for People and Homes, 2.3 Settlement Areas and Settlement Area Boundary Expansions, 2.5 Rural Areas in Municipalities, 2.9 Energy Conservation, Air Quality and Climate Change, 3.6 Sewage, Water and Stormwater, 3.9 Public Spaces, Recreation, Parks, Trails and Open Space, 4.1 Natural Heritage, 4.2 Water, 4.5 Mineral Aggregate Resources, 4.6 Cultural Heritage and Archaeology and 5.2 Natural Hazards.

Response Comment #1:

Please accept the following as an addendum to our original Planning Justification Report and further reference and justification on how the Proposed Development is consistent with Provincial Planning Statement (2024) (the “**PPS**”)

Planning for People and Homes

The Proposed Development is located within an identified rural settlement area in the Township of Melancthon and represents an appropriate form of residential intensification on an underutilized parcel. The development supports the broader objectives of the PPS by accommodating growth within a designated settlement area, consistent with the principles of complete communities and long-term land use planning.

The Proposed Development contributes to the Township’s ability to maintain a sufficient supply of land for residential development, consistent with Policy 2.1.4(a) of the PPS, which requires that municipalities maintain the ability to accommodate residential growth for a minimum of 15 years through designated and available lands. The proposed lots are appropriately sized and serviced by private wells and individual septic systems, in keeping with the servicing context of the area. Furthermore, the development includes draft-approved lots, supporting the requirement for at least a three-year supply of serviced residential units per Policy 2.1.4(b).

The Site is situated adjacent to existing residential development and integrates well with the established community fabric, helping to create a more complete and connected community as encouraged under Policy 2.1.6 of the PPS. The inclusion of a dedicated stormwater management block will help mitigate environmental and public health risks by treating and controlling runoff, and avoidance of areas within the floodline and existing natural heritage features.

The Proposed Development also contributes to a mix of housing types within the settlement area by providing single detached dwellings that are consistent with the character of surrounding neighborhoods, while also aligning with accessibility standards under the Accessibility for Ontarians with Disabilities Act (AODA). This supports enhanced accessibility and social equity outcomes, consistent with Policy 2.1.6(c) of the PPS.

Housing

The Proposed Development will create residential lots that will facilitate the construction of single detached homes. The proposed housing types is appropriate to the level of infrastructure available to service the lots and is also compatible with the existing subdivisions in the area. The Proposed Development will make efficient use of an underutilized parcel that will support existing public services in the area.

This is supported in the PPS by Policy 2.2.1 b) that encourages all housing options to meet the needs of residents, as well as Policy 2.2.1 c) in promoting densities for new housing that efficiently use land, resources, infrastructure and public service facilities.

Settlement Areas

The Proposed Development is located within an existing rural settlement area in the Township of Melancthon, where growth and development are to be focused in accordance with Policy 2.3.1.1 of the PPS. The design and configuration of the development compliment the adjacent existing development with similar lot frontages and areas and is an appropriate form of intensification that supports the overall objective of complete communities and responsible growth management in rural areas.

Although the Site is not located within a strategic growth area or near major transit infrastructure, the proposed land use pattern efficiently utilizes an underdeveloped parcel within the existing settlement boundary, consistent with Policy 2.3.1.2. The layout makes efficient use of land and resources while also integrating a dedicated stormwater management block and a proposed open space area for recreational use. These elements contribute to the sustainability and livability of the community while supporting a compact and environmentally responsible form of growth

The development contributes to a range and mix of housing options in the Township, helping to meet the evolving needs of current and future residents. It reflects local conditions by introducing appropriately scaled residential development that is compatible with the existing built form, lot fabric, and character of the surrounding communities. This aligns with Policy 2.3.1.3, which supports general intensification and redevelopment to contribute to the achievement of complete communities.

The development will rely on private servicing, which is consistent with the servicing context in the rural settlement of Horning's Mills. Infrastructure and public service needs are addressed through the proposed stormwater management system and the Site's proximity to existing public road infrastructure, satisfying the intent of Policy 2.3.2.1(b) with respect to servicing capacity and the logical extension of development within existing settlement boundaries.

This proposal does not require a new settlement area designation or boundary expansion and does not impact agricultural lands, specialty crop areas, or the broader agricultural system, avoiding the concerns identified in Policy 2.3.2. The development supports a phased and orderly progression of growth within the existing settlement area, keeping with the intent of provincial policy to align land use with infrastructure capacity and local conditions.

Rural Areas in Municipalities

The Proposed Development is located within a designated rural settlement area in the Township of Melancthon and supports the vitality, regeneration, and long-term sustainability of the Township's rural structure. Consistent with Policy 2.5 of the PPS, the proposal contributes to a healthy and viable rural area by introducing an appropriate form of residential growth that respects and builds upon the existing rural character.

The development has been designed to reflect the scale and form of surrounding residential uses, incorporating larger lots that are compatible with the local context. It utilizes rural infrastructure efficiently through reliance on individual private servicing, which is consistent with the Township's established approach to development in rural areas.

By accommodating a range of residential lots within an existing rural settlement boundary, the proposal contributes to a mix of housing options suited to the needs of rural residents, as outlined in Policy 2.5.1(c). This supports local population stability and provides opportunities for residents to remain in or relocate to rural communities.

The development also reinforces the Township's rural planning objectives by promoting regeneration within a rural settlement area, without requiring boundary expansion or the use of prime agricultural land. It maintains the integrity of surrounding agricultural and natural systems and avoids impacts to biodiversity and sensitive features on the Site.

In accordance with Policy 2.5.3, the scale and service level of the Proposed Development are appropriate for the rural context and consistent with locally defined rural characteristics.

Energy Conservation, Air Quality and Climate Change

The Proposed Development supports the objectives of Section 2.9 of the PPS by incorporating measures that contribute to energy conservation, environmental protection, and climate change resilience, while being appropriately scaled for a rural settlement context.

Although not located in an urban area where transit infrastructure is available, the proposal contributes to a more compact and complete rural community by directing growth to an existing rural settlement area. This helps reduce pressure for development in agricultural

or ecologically sensitive areas and minimizes the need for significant new infrastructure extensions, indirectly supporting greenhouse gas reduction and more efficient land use.

Climate change considerations have informed the design of the Proposed Development through the inclusion of a dedicated stormwater management block that addresses on-site water quality and quantity controls. This system supports long-term resilience to more frequent and intense weather events, consistent with Policy 2.9.1(b), and represents a form of low impact development that contributes to environmental protection goals.

By avoiding development in flood-prone areas and maintaining natural heritage features on the Site, the development minimizes environmental risk and contributes to improved air and water quality.

The lot sizes and servicing approach (private wells and septic systems) are designed to be compatible with local rural servicing capacity, avoiding the need for energy intensive infrastructure, and ensures that environmental safeguards are in place.

Land Use Compatibility

Section 3.5 of the PPS states that major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines.

The Site is separated from adjacent lands to the south, which are designated Light Industrial in the Township Official Plan, by significant existing natural features. These features including a significant woodlot through the south portion of the property and Horning's Mills Creek to the east, both of which provide an effective buffer between land uses. These features create a physical and visual separation, which limits the potential for land use conflicts and supports long-term compatibility between residential and industrial uses.

In addition to the natural buffering discussed above, any impacts of future light industrial uses south of the development will need to be minimized and mitigated from potential odour, noise and other contaminants with sensitive land uses to ensure long term compatibility. Currently, there are no active planning application for development on the lands designated Light Industrial.

Sewage, Water and Stormwater

The Proposed Development is supported by a Functional Servicing and Stormwater Management Report prepared by Pearson Engineering Ltd., which confirms that the Site is suitable for development on private services and that stormwater can be managed

effectively through a combination of best management practices as laid on in their report. The proposed servicing and stormwater strategy is consistent with the direction of Section 3.6 of the PPS, which prioritizes efficient, sustainable servicing solutions that protect human health, the natural environment, and water resources.

Each lot within the development will be serviced by individual on-site private wells and septic systems, consistent with Policy 3.6.4 of the PPS. Site-specific investigations have confirmed that conditions are suitable to support the long-term provision of these services with no negative impacts. This approach aligns with servicing expectations in rural settlement areas where municipal and communal systems are not available, planned, or feasible. The use of individual servicing in this context is a responsible and appropriate solution that reflects both local servicing conditions and the scale of development proposed.

The development also integrates stormwater management in accordance with the direction provided in Policy 3.6.8. A dry stormwater management (SWM) pond is proposed to provide quantity control, ensuring that post-development runoff rates are maintained at pre-development levels. For quality control, the SWM strategy includes an Oil Grit Separator (OGS) treatment unit and dry pond, supported by rooftop infiltration measures. This approach will help to reduce phosphorous levels and other contaminants from runoff before it leaves the site, in line with provincial best practices for water quality protection and erosion control.

The proposed stormwater management system has been designed to be feasible, financially viable over its life cycle, and responsive to both environmental and climate-related considerations. It minimizes increases in stormwater volumes and contaminant loads, protects downstream systems, and mitigates flood risks — consistent with Policies 3.6.8(b), (d), and (f). The inclusion of vegetative and pervious surfaces within the design also supports natural infiltration, promotes water balance, and improves resilience to extreme weather events.

Public Spaces, Recreation, Parks, Trails and Open Space

The Proposed Development supports the goals of Section 3.9 of the PPS by contributing to the creation of a healthy, inclusive, and connected rural community. The layout of internal roads and lot configurations has been designed with safety and accessibility in mind, helping to ensure that the development remains walkable and connected. These elements support the objectives of community health and well-being as identified in the PPS.

Natural Heritage

The Proposed Development has been planned to avoid impacts on natural heritage features and to ensure long-term protection of ecological functions in accordance with Section 4.1 of the PPS. The Site is located within a rural settlement area and has been

evaluated to confirm that no significant natural heritage features, such as significant wetlands, woodlands, valleylands, or wildlife habitat, will be affected by the development. As such, the proposal is fully consistent with Policy 4.1.4 and 4.1.5, which prohibit development and site alteration within these features unless it can be demonstrated that no negative impacts will occur.

Field investigations and environmental review confirmed that natural features present on the Site are preserved and protected through the Proposed Development layout. The stormwater management block has been located to avoid encroachment into any sensitive areas, and to provide enhanced water quality treatment, erosion control, and protection of local hydrological functions, thereby supporting the goals of Policies 4.1.1 and 4.1.2.

No development is proposed within fish habitat, and the project will comply with all applicable federal and provincial requirements, as required under Policy 4.1.6. No development is proposed within the habitat of endangered or threatened species, and any adjacent lands have been evaluated to confirm that ecological functions will not be negatively impacted, in accordance with Policy 4.1.8.

Water

The Proposed Development has been planned in a manner that protects and manages water resources responsibly, consistent with the direction of Section 4.2 of the PPS. The development incorporates a stormwater management strategy that minimizes impacts on surface water and groundwater quality and quantity, while maintaining the hydrologic function of the Site and surrounding area.

The Functional Servicing and Stormwater Management Report prepared by Pearson Engineering Ltd. confirms that the stormwater system has been designed to control both quantity and quality of runoff using a treatment train approach, including rooftop infiltration, a dry stormwater management pond, and an Oil Grit Separator (OGS) unit. This strategy will help to reduce peak flows to pre-development levels and limit phosphorous and contaminant loading to nearby water features, directly supporting Policies 4.2.1(a), (b), and (f).

The development avoids sensitive groundwater and surface water features, and where proximity exists, the design includes mitigation measures to ensure the protection of hydrologic functions, consistent with Policy 4.2.2. Site-specific conditions were reviewed to confirm the suitability of private wells and septic systems, ensuring there are no anticipated negative impacts on water quality or supply. Further explanation on the Site's functionality regarding stormwater, please refer to the Functional Servicing and Stormwater Management Report prepared by Pearson Engineering Ltd. The Hydrogeological Assessment Report prepared by Cambium Inc. concluded there is adequate water supply resources at the Site to support the Proposed Development. The wastewater assessment resulted in a nitrate concentration of 8.78 mg/L at the Site boundary, which is less than the

10 mg/L permitted by the C-5-4 guidelines. The Proposed Development is therefore expected to maintain acceptable nitrate concentration thresholds at property boundaries (Policy 4.2.1e).

Mineral Aggregate Resources

The Site was evaluated to determine if any mineral aggregate resources require long terms protection as outlined in Policy 4.5.1.1 of the PPS. The Mineral Aggregate Assessment included seven borehole samples that were investigated to characterize the native soil and subsurface conditions of the Site. The bedrock encountered was relatively deep in the area that would not make the Site feasible for quarry operations. The overburden consistency was generally found to be mixes of gravelly, silty sand. The grain-size analysis indicates that all samples were composed of more than 21% silt and clay with the content of fine-grained particle ranging between 21% to 88%. These results indicate the silt and clay content is consistently greater than 4% across the Site. Overall, the assessment concluded that the Site is not feasible for development as an extractive aggregate operation; therefore, the proposed residential development is an acceptable use of the land. Further justification to support that the Site is not suitable for aggregate use can be found in the Aggregate Resource Assessment Report (the “ARA”) prepared by Cambium Inc.

Cultural Heritage and Archaeology

The Proposed Development is consistent with the policies of Section 4.6 of the PPS that requires the identification and conservation of archaeological resources and cultural heritage features prior to development or site alteration. In support of these policies a Stage 1 and Stage 2 Archaeological Assessment was completed by Amick Consultants Limited to confirm the absence of archaeological or cultural heritage concerns. These assessments did conclude that no archaeological resources were encountered on the Site and recommended that no further assessment was required. In addition, a second, independent Stage 1 and Stage 2 Archaeological Assessment was carried out by Fischer Archaeological Consulting at the request of the Saugeen Ojibway Nation (SON). While the Site was identified as having high potential for both Indigenous and Euro-Canadian archaeological materials, no artifacts, features, or cultural heritage resources were identified through either pedestrian survey or shovel testing.

As a result of these comprehensive investigations, it has been concluded that the Site has been adequately assessed and does not contain archaeological resources or cultural heritage features. Accordingly, no further archaeological work is required, and development may proceed in accordance with provincial requirements.

This process reflects a thorough and respectful approach to cultural heritage planning and demonstrates compliance with Policy 4.6.2. Engagement with Indigenous communities, specifically the Saugeen Ojibway Nation, has been incorporated into the assessment

process, supporting Policy 4.6.5 and ensuring their interests were appropriately considered in the identification and management of archaeological resources.

Natural Hazards

The Proposed Development is consistent with Section 5.2 of the PPS, which directs development away from hazardous lands and ensures that natural hazards are appropriately identified and mitigated. As part of the planning process, a review of local environmental conditions and site-specific constraints was undertaken, including the delineation of hazard lands associated with nearby watercourses and low-lying areas. The development has been designed to entirely avoid these identified hazard lands.

The proposed subdivision layout ensures that no lots or development encroach into areas identified as being within a floodplain or subject to flood risk. A designated stormwater management block has been located on the Site, specifically outside of the floodline, to further mitigate risk. This aligns with the policy direction in 5.2.2 and 5.2.3, which require that development be directed outside of flood-prone areas and avoid locations that may become inaccessible or pose safety concerns during flooding events.

The design of the development also reflects consideration for climate resilience, in accordance with Policy 5.2.4, through the integration of a stormwater management system that can accommodate increases in runoff volumes associated with more intense or frequent storm events. The proposed dry stormwater pond, infiltration measures, and water quality controls are intended to manage peak flows and reduce downstream impacts, while protecting the safety and function of the surrounding area.

There is no hazardous forest types associated with wildland fire risk identified on the subject lands, and the Site is not located within or adjacent to a Special Policy Area. The Site does not contain any hazardous uses or sensitive institutional uses identified in Policy 5.2.6 that would be considered incompatible with potential natural hazards.

In our opinion, the Proposed Development is consistent with the direction of the 2024 Provincial Planning Statement, particularly in supporting managed growth, efficient land use, infrastructure considerations, and the development of complete, accessible and sustainable communities.

Comment #2:

In addition to comments above under the PPS heading for requested revisions to the Planning Justification Report, consideration is needed for how the Proposed Development achieves the Purpose and Objectives of the Niagara Escarpment Planning and Development Act (NEPDA).

The purpose of the NEPDA:

The purpose of this Act is to provide for the maintenance of the Niagara Escarpment and land in its vicinity substantially as a continuous natural environment, and to ensure only such development occurs as is compatible with that natural environment.

The objectives are:

(a) to protect unique ecologic and historic areas;

(b) to maintain and enhance the quality and character of natural streams and water supplies;

(c) to provide adequate opportunities for outdoor recreation;

(d) to maintain and enhance the open landscape character of the Niagara Escarpment

in so far as possible, by such means as compatible farming or forestry and by preserving the natural scenery;

(e) to ensure that all new development is compatible with the purpose of this Act as expressed in section 2;

(f) to provide for adequate public access to the Niagara Escarpment; and

(g) to support municipalities within the Niagara Escarpment Planning Area in their exercise of the planning functions conferred upon them by the Planning Act.

Response Comment #2:

The Proposed Development has been designed to ensure consistency with the Purpose and Objectives of the Niagara Escarpment Planning and Development Act (NEPDA). The subject lands are located within the Niagara Escarpment Plan (NEP) area and are designated as a Development Control Area, and accordingly, the policies and objectives of the NEPDA are of central importance in guiding appropriate land use.

The proposed residential subdivision has been planned to maintain the character and integrity of the Niagara Escarpment landscape. The Site is located within a designated settlement area and is surrounded by existing residential development to the east and west. There is no development proposed within any significant natural features, nor does it encroach upon escarpment slopes or sensitive environmental lands. All development is proposed outside of hazard lands, natural heritage features, and flood-prone areas, with a dedicated stormwater management block included to further protect the surrounding environment.

The design represents modest infill development that leverages existing infrastructure and land supply within the community, supporting growth while respecting the natural and rural character of the area. The revised lotting pattern reflects the comments provided to maintain and provide similar lotting sizes and is compatible with surrounding development patterns.

(a) To protect unique ecological and historic areas

A Natural Heritage Review has been completed for the Site in the form of an Environmental Impact Study prepared by Azimuth Environmental Consulting Inc. to address potential environmental concerns related to the Proposed Development. This study conducted background research, corresponded with appropriate environmental agencies such as the Nottawasaga Valley Conservation Authority, conducted a field program summary, reviewed vegetation community mapping and surveys, surveyed for species at risk, breeding birds, amphibian breeding, and fish and fish habitat.

This study then assessed the impact of the Proposed Development on habitats of threatened or endangered species, wetlands, significant woodlands, and candidate significant wildlife habitat.

The deciduous woodland located in the southwest corner of the Site was identified to have potential to provide maternity roost habitat for SAR bats. As such, it was recommended that the woodland be retained post-development and a 10-metre setback be applied. Therefore, there will be no direct impacts to the woodland or potential SAR bat habitat.

There is also a meadow marsh identified in the northwest corner of the Site that will not be impacted by the Proposed Development. A minimum setback of 5 metres is proposed from the limit of disturbance associated with the SWM Pond as it related to the meadow marsh.

Overall, the study concluded that the Proposed Development is not expected to negatively impact the ecological functions of the identified natural features if the appropriate mitigation measures are implemented as outlined in the Report, and the development has been designed to avoid any encroachment into potentially sensitive areas.

(b) To maintain and enhance the quality and character of natural streams and water supplies

The proposed stormwater management strategy prepared by Pearson Engineering Ltd. and the Hydrogeological Assessment prepared by Cambium Inc. has been developed to protect both surface water and groundwater resources, in accordance with best management practices. Runoff will be controlled and treated through a combination of infiltration measures, an Oil Grit Separator (OGS) unit, and a dry stormwater pond, ensuring no adverse impacts to local water quality or flow regimes. Private servicing (wells and septic) has been confirmed as appropriate for the area based on geotechnical investigations.

(c) To provide adequate opportunities for outdoor recreation

The subdivision has been designated to support passive recreational use by providing sidewalks within the development. At the request of the Township, the provision of a park

space has not been provided. The provision of pedestrian walkways within the development aligns with the NEPDA objective of supporting opportunities for outdoor recreation in rural and natural settings.

(d) To maintain and enhance the open landscape character of the Niagara Escarpment

The development maintains the open and low-density character of the existing rural residential community by providing estate sized lots and preserving natural buffers. The layout avoids visual clutter or overdevelopment and maintains the open views and natural feel that characterize this portion of the Niagara Escarpment Plan Area.

(e) To ensure that all new development is compatible with the purpose of this Act

The development has been carefully planned to reflect the purpose of the NEPDA by preserving the natural features, maintaining ecological integrity, and ensuring the development is compatible with the landscape and surrounding context. The proposed design provides a modest and appropriate form of growth within an existing settlement area and avoids the types of impacts (grading on escarpment slopes, loss of significant habitat, fragmentation of open space) that the Act seeks to prevent.

(f) To provide for adequate public access to the Niagara Escarpment

The development does not interfere with existing public access routes to the Escarpment, nor does it reduce access potential.

(g) To support municipalities within the Niagara Escarpment Plannin

g Area in their exercise of the planning functions conferred upon them by the Planning Act

The development aligns with the Township of Melancthon's planning objectives and responds to municipal staff comments from the first submission, including the revised lot layout to better reflect the surrounding subdivisions. This proposal supports the Township's ability to accommodate growth within designated areas while respecting broader provincial and NEP policy frameworks. Engagement with the Township and other agencies (including the Niagara Escarpment Commission) has informed a collaborative planning process.

Burnside Engineering, December 20, 2024

Comment #1:

We did not see any discussion about what buffering, if any, or restrictions on the lands may be needed to ensure compatibility with the adjacent lands that are labelled Light Industrial.

Response to Comment #1:

Appropriate natural buffers exist between the proposed residential development and the light industrial parcel.

The Site is separated from the adjacent Light Industrial lands by significant existing natural features, including a significant woodlot through the south portion of the property and Horning's Mills Creek to the east, both of which provide an effective buffer between land uses. These features create a physical and visual separation, which limits the potential for land use conflicts and supports long-term compatibility between residential and industrial uses.

In addition to the natural buffering discussed above, any impacts of future light industrial uses south of the development will need to be minimized and mitigated from potential odour, noise and other contaminants with sensitive land uses to ensure long term compatibility. Currently, there are no active planning application for development on the lands designated Light Industrial.

Conclusion

We trust the above provides further justification on how the Proposed Development is consistent with the Provincial Planning Statement and conforms to the policies of the County of Dufferin Official Plan, 2024.

If you have any questions or require further information, please contact the undersigned.

Yours truly,
GSP Group Inc.



Valerie Schmidt, MCIP, RPP
Development Planning Manager



Michael Serra, BEDP, CPT
Planner