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City of Kawartha Lakes
Development Services
Planning Division

Planning Justification Brief

**511 Emily Park Road
Part of Lot 12, Concession 4,
City of Kawartha Lakes**

D.M. Wills Project Number 19-7378



D.M. Wills Associates Limited
Peterborough

August 2020

**Prepared for:
Mr. Derrick Lennox**

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1.0 Introduction

D.M. Wills Associates Limited (Wills) has been retained by Derrick Lennox (Client) to prepare this Planning Justification Brief (Brief) in support of an application for consent (Lot Addition) for the property located at 511 Emily Park Road, Part of Lot 12, Concession 4 (Subject Property) in the former geographic Township of Emily, now in the City of Kawartha Lakes (City). The consent application entails a lot boundary adjustment to convey approximately 10 acres (4.05 hectares) of land fronting on Highway 7 (Subject Site) to the abutting Emily Cemetery located at 4249 Highway 7.

1.1 Purpose of Planning Justification Brief

The application benefits from a pre-consultation meeting, which was conducted with the City and other interested agencies on January 24th, 2019. As identified in the final comments circulated from the pre-consultation meeting, a Lot Addition is required for a lot boundary adjustment to convey approximately 10 acres (4.05 hectares) of land from the Subject Site to the abutting Emily Cemetery. Refer to **Appendix A**.

The purpose of this Brief is to provide a review and analysis of the proposed Lot Addition in the context of both provincial and municipal planning policies. This Brief is submitted in support of the planning application.

2.0 Project Background

2.1 Property Location and Surrounding Land Uses

The Subject Property is located at 511 Emily Park Road, Part of Lot 12, Concession 4 in the former geographic Township of Emily, now the City of Kawartha Lakes consisting of 134 acres (54.2 hectares). The Subject Site is located at the southeast corner of the Subject Property and is comprised of approximately 10 acres (4.05 hectares). The Subject Property is located approximately 3 kilometres west of the Village of Omemee, and 2 kilometres south of Emily Provincial Park. Refer to **Figure 1**.

The Subject Property is located in the northwest quadrant of the intersection of Highway 7 and Emily Park Road, east of the Village of Omemee. In the immediate vicinity, there are a number of existing rural residential properties directly neighbouring the Subject Property, both along Emily Park Road and Highway 7. Several agricultural operations exist in the nearby vicinity. These operations are predominately a mix of beef cattle, alpaca, equine and cash crop operations. The Emily Cemetery is located adjacent to the Subject Site and has been in operation since 1872. Refer to **Figure 2**. A small portion of the northeasterly lands on the Subject Property have been identified as a provincially significant wetland, connected to a larger provincially significant wetland that extends east of Emily Park Road. Refer to **Figure 3**.

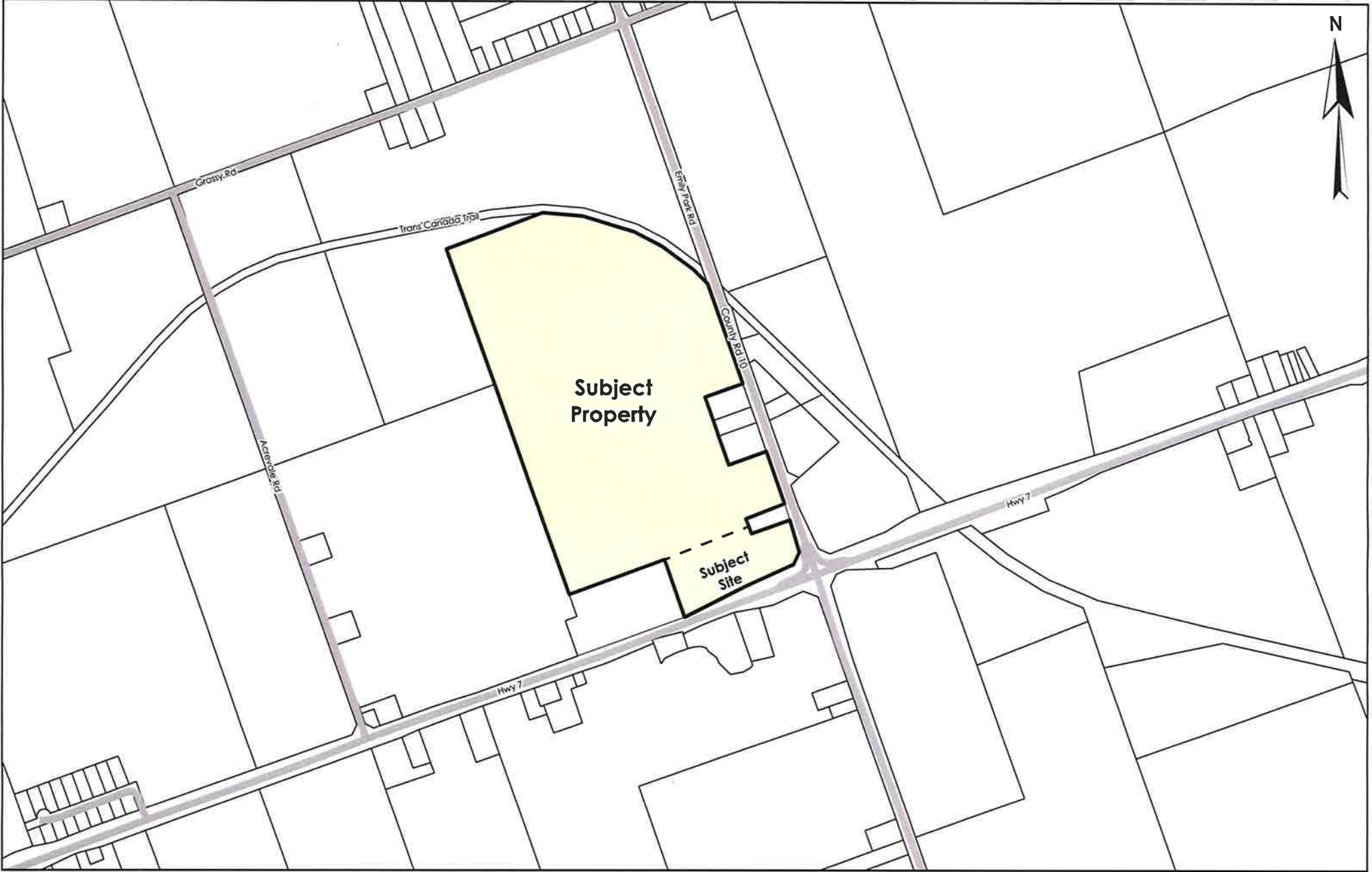


Figure 1
Key Map



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- Legend
- Road
 - Property Boundary
 - Subject Property

Drawn by:	AK
Checked by:	KH
Map Date	November, 2019
Project No.	7378
Map File No.	
Scale	NAD83 UTM Zone 17 North
0 80 160 320	Meters



Figure 2
Surrounding Land Uses



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Legend

- Highway
- Arterial
- Local
- Subject Property

Drawn by:	AK
Checked by:	KH
Map Date	November, 2019
Project No.	7378
Map File No.	
Scale	NAD83 UTM Zone 17 North
0 125 250 500	Meters

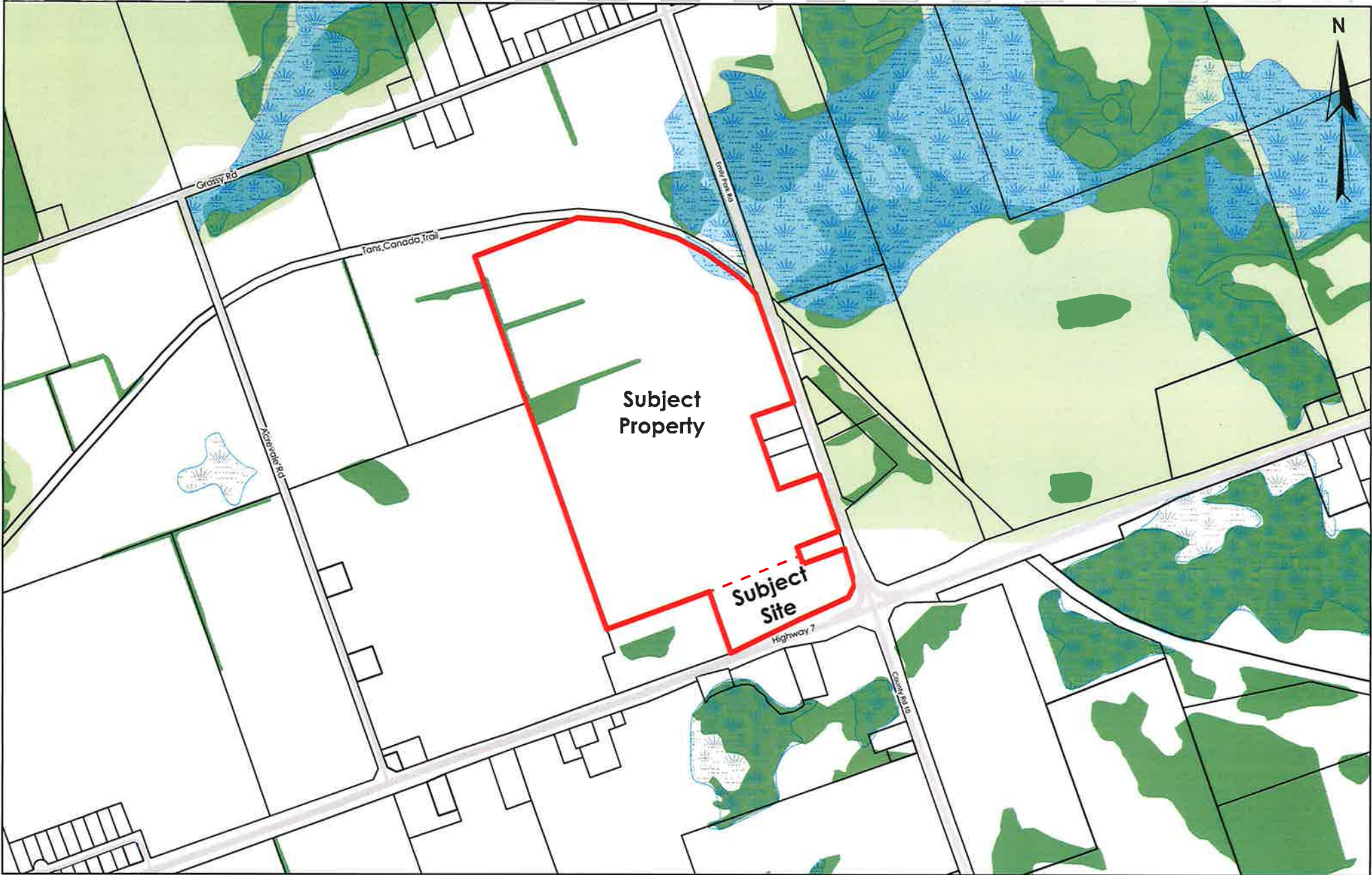


Figure 3
Natural Heritage Features



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Legend

- Road
- Subject Property
- Property Boundary

- Unevaluated Wetland
- Provincially Significant Wetland Evaluated
- Non-Provincially Significant Wetland Evaluated
- Woodland
- Natural Heritage System Area

Drawn by:	AK
Checked by:	KH
Map Date	November, 2019
Project No.	7378
Map File No.	

Scale 0 85 170 340 Meters
NAD83 UTM Zone 17 North

2.2 Property Development and Uses

The Subject Property contains a dwelling serviced by a private individual well and septic system, a drive shed and several cultivated fields that have been historically rented out for agricultural use. The cultivated fields are currently rented by a local farmer for growing rotational field crops. Approximately half of the Subject Site (~5.6 acres) has been cultivated and in 2019 was used for the production of hay. Refer to **Appendix B**.

To note, there are no proposed land use changes to the Subject Property, as the lands will remain in agricultural production. The Subject Site is a proposed extension to the existing Emily Cemetery. Refer to **Figure 4**. Access to the Subject Site will be from the existing entrances to the Cemetery from Highway 7.

The Subject Property is designated as 'Sand and Gravel', 'Rural', and 'Environmental Protection' in the City of Kawartha Lakes Official Plan, and zoned 'Agricultural' (A1) in the Township of Emily Zoning By-law 1996-30. Additionally, although not in effect, the Subject Property is identified as a 'Candidate Area' under the Agricultural Systems mapping prepared by the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA).

NOTE:
THIS DRAWING IS A SITEPLAN AND AN APPROXIMATION
BASED ON PUBLICLY ACCESSED INFORMATION. THIS IS
NOT A SURVEY.

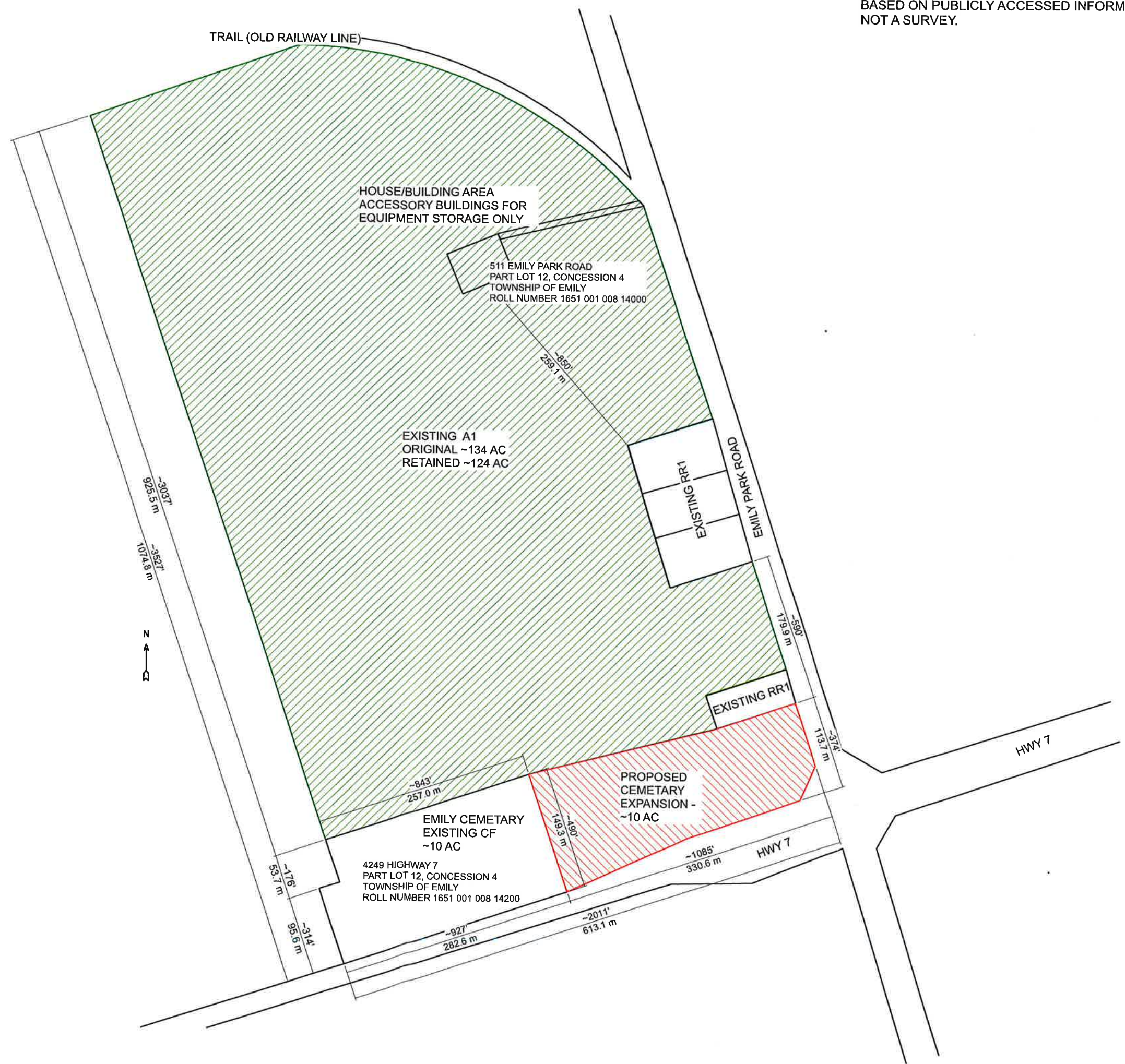


Figure 4 - Lot Configuration

3.0 Supporting Technical Studies

As a result of the pre-consultation meeting held with the City on January 24th, 2019, the following studies were identified as requirements for the consent application.

3.1 Agricultural Impact Brief

In January 2020, Wills completed an Agricultural Impact Brief (AIB) for the Subject Property. The AIB examined the Subject Property's agricultural characteristics; reviewed the potential impact of the proposed non-agricultural uses on the wider agricultural system; and reviewed the relevant planning policies pertinent to the planning application. The AIB concluded that the proposed Lot Addition to expand the existing Emily Cemetery is appropriate for the following reasons:

- *The soil mapping and classification systems identified that the Subject Site contains Class 5 soils, an OMAFRA classification for stoniness of 4, and that the topography, coupled with drainage, contributes to a low CLI Soil Capability of Agriculture indicating that the lands are marginal for agricultural production;*
- *Within the context of a larger agricultural system, the use of the Subject Site for non-agricultural uses will not inhibit normal farm practices nor inconvenience farmers of surrounding agricultural operations;*
- *The Subject Site's location next to two (2) arterial roadways serves to limit the effect of field fragmentation. As such, and with consideration to on-site agricultural limitations, the use of the Subject Site for any future farm consolidation would not be overtly beneficial. Rather the Subject Site represents an ideal location and logical extension for the expansion of the Emily Cemetery; and,*
- *That the net potential impacts to agriculture as a result of the proposed consent application are negligible.*

According to the AIB, the proposed Lot Addition to expand the Emily Cemetery is an appropriate development for the rural property, and does not adversely affect the agricultural integrity of the area.

3.2 Aggregate Impact Study

In January 2020, Wills completed an Aggregate Impact Study (AIS) on the Subject Property in support of the consent application (Lot Addition). The AIS included extensive background information and policy review; a site inspection; and an examination of land use compatibility and aggregate development constraints. The AIS report was prepared on the basis of the Ministry of Natural Resources and Forestry (MNRF) Terms of Reference for an Aggregate Study. The AIS's compatibility analysis noted the following:

- *The proximity of the Proposed Severed Parcel to the intersection of Highway 7 and Emily Park Road limits the use of these lands for a potential entrance point for a future aggregate operation. Additionally, the Proposed Severed Parcel's high relief with respect to the adjacent roadways further limits its usability in this context.*
- *The Proposed Development is expected to result in minimal traffic volume increases and access will be provided using the existing Emily Park Cemetery entrances. As a result, the Proposed Development would not pose traffic compatibility issues with a future aggregate operation in the area.*
- *The environmental impact of the Proposed Development is expected to be minimal, and will not require a significant draw on, or impact to, local groundwater or surface water resources that may compete with a future aggregate operation. Conflicts resulting from the competing demands of the Proposed Development and a future aggregate operation in the area are not expected.*
- *The Proposed Development has the potential to restrict the available resource tonnage for a future aggregate operation on the remainder of the Subject Property. The amount of aggregate has been determined to be relatively minor.*

The AIS concluded that based on the size, potential quality, proximity to residential structures and access issues, it is unlikely that an applicant would pursue a license to operate a standalone aggregate operation on the Proposed Severed Parcel (Subject Site). Extraction of aggregate on the Subject Site may be feasible if part of a larger operation, however this would constitute a very small volume with respect to what is suggested on the remainder of the Subject Property. Additionally, the Proposed Development is not anticipated to prevent or cause any land use compatibility issues with the future development of aggregate resources elsewhere on the Subject Property. Additionally, the Proposed Development may provide a greater long term benefit to the local and surrounding communities than reserving this small area for the future development of an aggregate resource of unknown quality.

3.3 Species at Risk Evaluation Report

In June 2020, Wills completed a Species at Risk (SAR) Evaluation (Evaluation) for the Subject Property as the Kawartha Region Conservation Authority (KRCA) advised of the potential for SAR on and adjacent to the Subject Property. The purpose of the Evaluation was to identify any SAR or SAR habitat on and/or around the Subject Property. The Evaluation included target surveys for Eastern Meadowlark and Bobolink.

The evaluation concluded that although Eastern Meadowlark were observed on the Subject Property, the Subject Site does not provide habitat for Eastern Meadowlark or Bobolink. The report noted that vegetation on the Subject Site was "sparse, with very little cover for their nests." It is important to note that no Eastern Meadowlark, Bobolink, or other SAR were observed on the Subject Site.

According to the Evaluation, the proposed Lot Addition to expand the Emily Cemetery will not result in an adverse impact to SAR, as long as relevant timing windows are followed. The Evaluation recommends that:

"to ensure no bird species are impacted during construction, it is recommended that any vegetation removal should take place outside of the breeding bird-timing window that is typically April 15 to July 31. If work cannot be done outside of the timing window, a professional biologist should complete a nest sweep of the property prior to any vegetation removal."

Correspondence was received from the Ministry of Environment, Conservation, and Parks (MECP) on August 6th, 2020, confirming that the list of SAR investigated was comprehensive. This correspondence is included in **Appendix B**.

4.0 Policy Framework

As noted in **Section 2.2** of this report, the Subject Property is designated as 'Sand and Gravel', 'Rural' and 'Environmental Protection' in the City of Kawartha Lakes Official Plan, and zoned 'Agricultural' (A1) in the Township of Emily Zoning By-law 1996-30. Although not currently in effect, the Subject Property is additionally identified as a 'Candidate Area' under the Agricultural Systems mapping prepared by the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA).

The following provincial and municipal land use policy documents contain policies that relate to the proposed development of the Subject Site. The policy documents include: the Provincial Policy Statement (2020); A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019); the City of Kawartha Lakes Official Plan (2012); and the Township of Emily Comprehensive Zoning By-law 1996-30.

4.1 Provincial

4.1.1 Provincial Policy Statement (2020)

The 2020 Provincial Policy Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development. *Section 3 of the Planning Act* requires that decisions affecting planning matters "shall be consistent with" policy statements issued under *the Act*. In general, the PPS seeks to promote the development of communities that are socially, economically, and environmentally resilient.

1.1.4 Rural Areas in Municipalities

1.1.4.1 Healthy, integrated and viable rural areas should be supported by:

e) using rural infrastructure and public service facilities efficiently;

1.1.5 Rural Lands in Municipalities

1.1.5.2 On rural lands located in municipalities, permitted uses are:

f) cemeteries

- 1.1.5.4 Development that is compatible with the rural landscape and can be sustained by rural service levels should be promoted.*
- 1.1.5.5 Development shall be appropriate to the infrastructure, which is planned or available, and avoid the need for the unjustified and/or uneconomical expansion of this infrastructure.*
- 1.1.5.8 New land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.*
- 2.1 Natural Heritage**
 - 2.1.1 Natural features and areas shall be protected for the long term.*
 - 2.1.7 Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.*
- 2.5 Mineral Aggregate Resources**
 - 2.5.1 Mineral aggregate resources shall be protected for long-term use and, where provincial information is available, deposits of mineral aggregate resources shall be identified.*
 - 2.5.2.5 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; or,*
 - b) the proposed land use or development serves a greater long-term public interest; and,*
 - c) issues of public health, public safety and environmental impact are addressed.*
- 2.6 Cultural Heritage and Archaeology**
 - 2.6.1 Significant built heritage resources and significant cultural heritage landscapes shall be conserved.*
 - 2.6.3 Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property except where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the protected heritage property will be conserved.*

4.1.2 A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019)

A Place to Grow: The Growth Plan for the Greater Golden Horseshoe (Growth Plan) provides additional Provincial policy for lands within one of the fastest growing regions in North America. Its policies are intended to support growth and development while

ensuring that it occurs in an orderly and well-planned fashion, so as to protect the social, economic, and environmental interests of Ontario and its residents.

Section 1.2.3 Relationship with the Provincial Policy Statement (PPS)

The PPS provides overall policy direction on matters of provincial interest related to land use and development in Ontario, and applies to the GGH, except where this Plan or another provincial plan provides otherwise.

Like other provincial plans, this Plan builds upon the policy foundation provided by the PPS and provides additional and more specific land use planning policies to address issues facing specific geographic areas in Ontario. This Plan is to be read in conjunction with the PPS. The policies of this Plan take precedence over the policies of the PPS to the extent of any conflict, except where the relevant legislation provides otherwise. Where the policies of this Plan address the same, similar, related, or overlapping matters as policies in the PPS, applying the more specific policies of this Plan satisfies the requirements of the more general policies in the PPS. In contrast, where matters addressed in the PPS do not overlap with policies in this Plan, those PPS policies must be independently satisfied.

As provided for in the Places to Grow Act, 2005, this Plan prevails where there is a conflict between this Plan and the PPS. The only exception is where the conflict is between policies relating to the natural environment or human health. In that case, the direction that provides more protection to the natural environment or human health prevails.

Section 2.2.9 Rural Areas

3. Subject to the policies in Section 4, development outside of settlement areas may be permitted on rural lands for:

- c) other rural land uses that are not appropriate in settlement areas provided they:
 - i. are compatible with the rural landscape and surrounding local land uses;
 - ii. will be sustained by rural service levels; and,
 - iii. will not adversely affect the protection of agricultural uses and other resource-based uses such as mineral aggregate operations.

Section 4.2.2 Natural Heritage System

3. Within the Natural Heritage System for the Growth Plan:

- a) new development or site alteration will demonstrate that:
 - i. there are no negative impacts on key natural heritage features or key hydrologic features or their functions;

Section 4.2.4 Lands Adjacent to Key Hydrologic Features and Key Natural Heritage Features

1. *Outside settlement areas, a proposal for new development or site alteration within 120 metres of a key natural heritage feature within the Natural Heritage System for the Growth Plan or a key hydrologic feature will require a natural heritage evaluation or hydrologic evaluation that identifies a vegetation protection zone.*

Section 4.2.6 Agricultural System

3. *Where agricultural uses and non-agricultural uses interface outside of settlement areas, land use compatibility will be achieved by avoiding or where avoidance is not possible, minimizing and mitigating adverse impacts on the Agricultural System.*

Section 4.2.7 Cultural Heritage Resources

1. *Cultural heritage resources will be conserved in order to foster a sense of place and benefit communities, particularly in strategic growth areas.*

Section 4.2.8 Mineral Aggregate Resources

1. *Municipalities will develop and implement official plan policies and other strategies to conserve mineral aggregate resources.*

4.2 Municipal

4.2.1 City of Kawartha Lakes Official Plan (2012)

The City of Kawartha Lakes Official Plan (CKLOP) sets the land use and planning framework for local Official Plans and decision making. The CKLOP outlines a long term vision for the City's physical form and community character. The CKLOP describes the Subject Property as 'Sand and Gravel', 'Rural' and 'Environmental Protection'. Refer to **Figure 5**.

10. Culture and Heritage

10.2 Objectives

- a) *To conserve and enhance the City's cultural and heritage resources. Features of particular interest include buildings, structures and significant structural remains, areas of unique or rare composition, landscapes of scenic value, artifacts, archaeological sites, cemeteries and burial grounds.*

10.5 Heritage

- g) *The City shall ensure land development adjacent to protected heritage properties are not adversely impacting identified heritage attributes of these properties.*

16. Rural Designation

16.3 Policies

The primary use will be agriculture in the form of ranching and forestry. Where farming uses exist, new uses that are compatible with and not hindering the agricultural use will be permitted.

16.3.9 A severance for a minor lot line adjustment may be permitted provided it does not create a separate building lot that would otherwise require an amendment to this plan.

17. Environmental Protection Designation

17.3 Policies

17.3.1 Permitted uses within this designation should maintain the unique natural characteristics of such lands and should not contribute to problems of erosion, flooding, pollution or the deterioration of the environment.

24. Sand and Gravel Resource Designation

24.3 Policies

24.3.1 The permitted uses in areas of known high potential sand and gravel resources shall be agriculture, forestry and open space passive recreational uses. The Sand and Gravel Resource Designation is also intended to act as a buffer between existing Aggregate Designations and adjacent uses. It is the intent of this Official Plan that sand and gravel resources be protected by directing permanent development away from these areas.

24.3.3 All lands designated should be preserved for possible future use for sand and gravel extraction where possible. In areas adjacent to known deposits of sand and gravel resources, development and activities which would preclude or hinder the establishment of new operations or access to the resources shall only be permitted if:

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

24.3.4 Minor adjustments to the boundaries to the boundaries of areas of known high potential sand and gravel resources, based on more detailed site evaluation, may be permitted without amendment to the Official Plan.

24.3.7 Within lands identified on Schedule A as Sand and Gravel Resource, a parcel may be severed by consent into a separate lot if the retained and severed parcels satisfy the abutting Official Plan and Zoning By-law requirements and does not generate any land use compatibility constraints for a potential aggregate operation or licensed aggregate operation.

24.3.8 Within lands identified on Schedule A as Sand and Gravel Resource, certain parcels of land may not have aggregate potential. In such

cases, an alternative use consistent with the surrounding uses and in conformity with the abutting designation may be considered if Council is satisfied that the proposed use will not impede sand and gravel extraction either on the property to be used or on other holdings in the vicinity. A study by a qualified professional must be completed to the satisfaction of the Council to demonstrate that the parcel of land has no commercial potential for the extraction of sand and gravel. The study must provide information on the quality and quantity of subsurface material to a sufficient depth to assess the feasibility of a commercial mining operation on the site and any other information that the Ministry of Natural Resources or Council deems necessary. The Ministry must confirm in writing that they concur with the findings of the study that there is no commercial sand and gravel potential on the land.

33 *Division of Land and Buildings*

33.3 *Consents*

33.3.4 *Consents should not be granted where access may create a traffic hazard because of limited sight lines on curves or grades.*

33.3.5 *The size of any parcel of land created by Consent should be appropriate for the proposed uses and the services available.*



Figure 5 - Official Plan



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Legend

-  Subject Property
-  Road
-  Rural
-  Environmental Protection
-  Aggregate
-  Sand and Gravel Resource

Drawn by:	AK
Checked by:	KH
Map Date	November, 2019
Project No.	7378
Map File No.	
Scale	NAD83 UTM Zone 17 North
0 70 140 280	Meters

4.2.2 Township of Emily Comprehensive Zoning By-law (1996)

The Subject Property is designated as "Agricultural (A1) Zone" in the Township of Emily Comprehensive Zoning By-law. Refer to **Figure 6**.

Part 7- Agricultural (A1) Zone

7.1 Uses Permitted

7.1.1.4 Existing cemeteries and expansions which increase their size to a maximum lot area equal to twice the existing area.

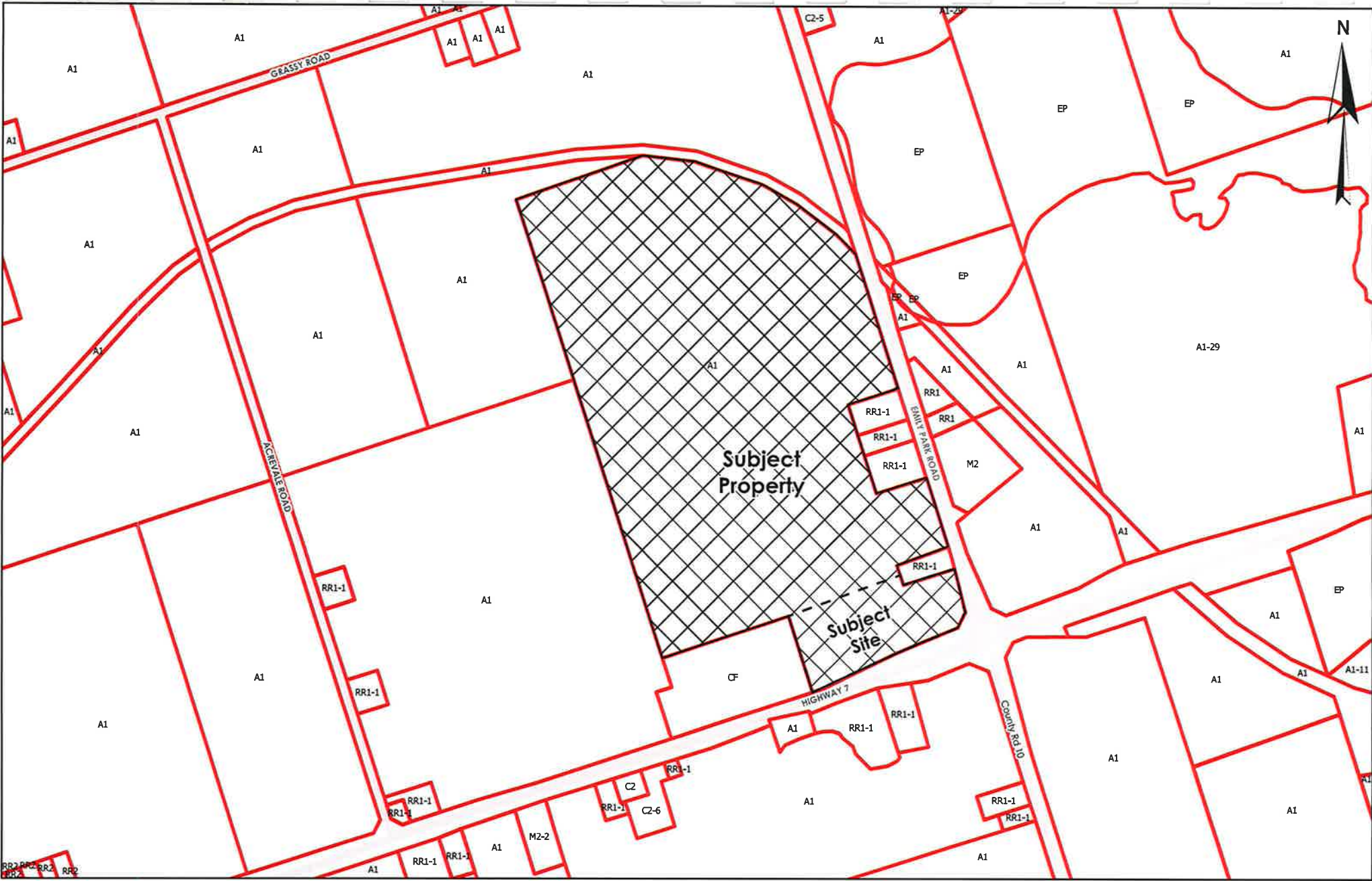


Figure 6
Zoning



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Legend

- Zoning
- Road
- Subject Property

A1- Agricultural Zone
RR1- Rural Residential Type One
CF- Community Facility
C2- Highway Commercial Zone
EP - Environmental Protection
M2- General Industrial Zone

Drawn by:	AK
Checked by:	KH
Map Date	November, 2019
Project No.	7378
Map File No.	
Scale	90 150 300 NAD83 UTM Zone 17 North Meters

5.0 Planning Rationale

The proposed planning application is consistent with the aforementioned applicable provincial and municipal policies as outlined in **Section 4.0**.

The proposed Lot Addition to permit the expansion of the Emily Cemetery meets the criteria of *Section 1.1.5* of the *PPS*, as cemeteries are a permitted use on rural lands within municipalities and that it *"is compatible with the rural landscape and can be sustained by rural service levels"*. With respect to *Section 1.1.5.8* where the creation of lots shall comply with minimum distance separation (MDS), it was determined that this application is exempt from MDS, as *"Existing cemeteries and expansions which increase their size to a maximum lot area equal to twice the existing area"* is an existing permitted use in the A1 Zone of the Township of Emily Zoning By-law. Correspondence with the City regarding this matter is included in **Appendix B**.

Given the distance between the Subject Site and the portion of an identified Provincially Significant Wetland (PSW) on the northeastern portion of the Subject Property, the proposed development in no way impacts the identified natural heritage feature. Additionally, provided the conclusions of the SAR Evaluation, *Section 2.1.7* regarding development and site alteration in habitat of endangered and threatened species, has been addressed where it was determined that the proposed development will not result in an adverse impact to SAR.

With respect to the mineral aggregate resources identified on the Subject Site and Subject Property, the AIS concluded that based on the size, potential quality, proximity to residential structures and access issues, it is unlikely that an applicant would pursue a license to operate a standalone aggregate operation on the Subject Site and that the proposed development may serve a greater long-term public interest. With respect to Cultural Heritage, the Emily Cemetery is a designated Heritage property. Therefore, the proposed development complies with *Section 2.6.3* of the *PPS* that notes that planning authorities shall not permit development and or site alteration on adjacent lands to protected heritage properties.

The proposed development further complies with the criteria *Section 2.2.9* of the *Growth Plan* as both the AIB and AIS demonstrated that the proposed expansion to the Emily Cemetery is a compatible land use, can be sustained by rural service levels and *"will not adversely affect the protection of agricultural uses and other resource-based uses such as mineral aggregate operations."* The location of the proposed development does not contain any natural heritage features and has been previously impacted by development, therefore the proposed development satisfies the requirements of *Section 4.2.2* and *Section 4.2.4* of the *Growth Plan*, as the proposed development is not impacting natural features in the area. With respect to *Section 4.2.6* of the *Growth Plan*, the AIB demonstrated that the proposed development is compatible and would have minimal impacts on the agricultural community.

In the CKLOP, *Section 10.2* notes that an objective of the City is to *"conserve and enhance the City's cultural and heritage resources"* which includes cemeteries and

burial grounds. Additionally, Section 16.3 notes that "new uses that are compatible with and not hindering the agricultural use" are permitted in the rural areas. As the Subject Site is designated in its entirety, "Sand and Gravel Resource", the AIS demonstrated that the proposed development complies with the policies of Section 24.3 of the CKLOP, especially Section 24.3.3 which notes that development in areas of known deposits of sand and gravel shall only be permitted if the aggregate resources use would not be feasible; or the proposed land use or development serves a greater long term public interest; and issues of public health and safety and environmental impact are addressed. With respect to compliance with Section 24.3.8, it was confirmed with CKL staff on January 30th, that this application would not require a letter from the MNRF confirming the results of the AIS. Refer to **Appendix B**. Section 33.3 of the CKLOP provides direction with respect to consent applications. As this proposed Lot Addition would utilize the existing entrances to Emily Cemetery and that the existing use is permitted in the current Zoning By-law, the proposed development complies with Sections 33.3.4 and 33.3.5 of the CKLOP.

6.0 Discussion and Conclusions

This Planning Justification Brief has been prepared in support of a consent application to convey approximately 10 acres (4.05 hectares) of land fronting on Highway 7 to the abutting Emily Cemetery. The Brief has provided an analysis of the applicable provincial and local policy documents in the context of the proposed development.

It is our opinion that the proposed development on the Subject Site is a compatible land use and will not adversely impact the surrounding lands and that the proposed development complies with the relevant provincial and local policies discussed herein.

Based on the background information, the features on site and the forgoing review of the relevant policies, it is our opinion that the proposed consent application is consistent with and conforms to provincial and municipal policies and constitutes as good planning.

Respectfully Submitted,

Written By:



Katherine Howes, M.Sc.
Land Use Planner

KH/DK/hd

Reviewed By:



Diana Keay, MCIP, RPP
Senior Land Use Planner