

MINIMUM DISTANCE SEPERATION COVER LETTER

565 WESLEY ACRES ROAD

1

February 25, 2025

Mr. Matt Coffey

Planning Coordinator, Approvals
The Corporation of the County of Prince Edward

**RE: 565 Wesley Acres Road
Minimum Distance Separation Study Submission Cover Letter
Zoning By-law Amendment**

Dear Mr. Coffey,

Fotenn Planning + Design is pleased to submit this letter and supporting documentation on behalf of Campfire Circle and Cope Group Inc. for the property at 565 Wesley Acres Road. This letter provides an overview of the Minimum Distance Separation study process as it relates to the ongoing planning application on the property.

The attached Minimum Distance Separation Study was prepared in support of the due diligence process undertaken by Campfire Circle in the acquisition of the subject property. The initial study was prepared in 2022, and the calculations were republished in 2025 to accompany this cover letter. The study was intended to inform the site design for the proposed tourist commercial use, ensuring that all proposed development occurred outside of the resulting setbacks from surrounding livestock facilities. A Minimum Distance Separation study was not required by the County as part of a complete application for zoning by-law amendment.

We recognize that the County has received correspondence regarding surrounding livestock facilities. A copy of the due diligence report is therefore being provided as supplementary information in support of the proposed application for zoning by-law amendment.

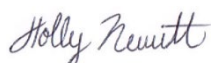
Of note, it is understood through word-of-mouth that the livestock facility located at 357 Wesley Acres Road contains chickens. As the type of livestock could not be confirmed by Fotenn directly at the time of writing, in accordance with the Implementation Guidelines provided in Publication 853 the facility at 357 Wesley Acres Road was evaluated as an "unoccupied livestock barn" to provide the most conservative setback. Unoccupied livestock barns generally have the most stringent setback requirements as they are reviewed based on their potential to house any type of livestock in the future. Based on the size of the barn, the MDS calculation resulted in a minimum separation distance of 375 metres. The actual separation distance to the subject property is approximately 740 metres. The attached Minimum Separation Distance Study concludes that the proposed development is appropriately separated from surrounding livestock facilities in the area.

We trust that the submission addresses any outstanding concerns regarding MDS compliance for the proposed development. Please feel free to contact us with any additional comments or questions at 613.542.5454.

Respectfully submitted,



Miles Weekes, MCIP RPP
Senior Planner
Fotenn Planning + Design



Holly Newitt, MCIP RPP
Planner
Fotenn Planning + Design

CAMPFIRE CIRCLE

MINIMUM DISTANCE SEPARATION STUDY

1

August 30, 2022
Updated – February 24, 2025

Mr. Matt Coffey
Planning Coordinator, Approvals
The Corporation of the County of Prince Edward

RE: 565 Wesley Acres Road
Minimum Distance Separation Study

Dear Mr. Coffey,

Fotenn Planning + Design has been retained by Campfire Circle, to prepare a Minimum Distance Separation (MDS) study as it relates to the property municipally known as 565 Wesley Acres Road. Our MDS study applies the March 2017 MDS guidelines as detailed in Publication 853 issued by the Ministry of Agriculture, Food and Rural Affairs (OMAFRA). In addition to the guidelines themselves, Publication 853 details the implementation and interpretation of MDS guidelines in Ontario. This letter provides the results of the MDS study.

Site Description + Surrounding Context

The site is located south of the village of Bloomfield in Prince Edward County. The property has an area of approximately 42.3 hectares, approximately 12 metres of frontage on the south side of Wesley Acres Road, and over 700 metres of water frontage. The property is split-designated Shoreland and Environmental Protection on the Schedule 'A-3': Land Use Designations in the County Official Plan (2021) and split-zoned Environmental Protection – Provincially Significant Wetland (EP-W) and Rural 2 (RU2) in the County of Prince Edward Comprehensive Zoning By-law 1816-2006. The site is currently used for agricultural purposes. The surrounding area is primarily characterized by rural, agricultural and tourist commercial uses.

Proposed Development

The applicant is proposing to develop a tourist commercial use on the site in the form of an oncology camp that supports kids and families affected by childhood cancer. The camp is proposed to include accommodation for campers and staff, activity buildings, medical buildings and flex buildings.

Minimum Distance Separation Study

The proposal seeks to permit the development of an existing lot, and is therefore subject to MDS I.

Requirement for MDS Setback

MDS I setbacks are calculated based on the nature of the proposed land use. Type A (less sensitive) land uses, as described in Guideline #33 and #34, are characterized by lower density of occupancy, habitation or activity and include agriculture-related and on-farm diversified uses, industrial uses, agricultural lot creation and residential lot creation that does not result in a concentration of four or more lots in immediate proximity. Type B (more sensitive) uses are generally higher density in terms of occupancy, habitation or activity as described in Guideline #34 and include official plan and zoning by-law amendments to permit development, excluding industrial uses.

Investigation Distance

Where an MDS setback is required, it must be measured from all existing livestock facilities and anaerobic digesters that are reasonably expected to be impacted by the proposed development. Given the nature of the proposed development, this proposal was classified as a Type B (more sensitive) land use for the purpose of the investigation distance. IG #6 limits the investigation distance to 1,500 metres of a proposed Type B land use.

Using aerial imagery, we identified four possible livestock facilities within 1,500 metres of the subject property, located at the following municipal addresses:

- / Possible Barn #1 – 528 Wesley Acres Road
- / Possible Barn #2 – 357 Wesley Acres Road
- / Possible Barn #3 – 768 County Road 12
- / Possible Barn #4 – 662 County Road 12

IG #12 allows for a reduced MDS setback where there are four or more uses of equal or greater sensitivity in the intervening area between the subject site and identified livestock facilities. The intervening area is described as an area within a 120-degree arc extending from the barn in question towards the subject site. There are an insufficient number of Type B uses separating the site from the possible barns, triggering the need for further investigation.

Possible barn #4 was identified as having been converted to a commercial use. A site visit was conducted on August 24, 2022 confirmed that the building is currently vacant but did support commercial uses in the past. The possible barn was therefore considered to be uninhabitable for livestock. The MDS setback was, therefore, not calculated for this property.

Barn #1 – 528 Wesley Acres Road

The property at 528 Wesley Acres Road is located northeast of the subject property on the north side of Wesley Acres Road. The property contains a dwelling and various agricultural accessory buildings, including one possible barn. The lot area is approximately 26.0 hectares. A site visit was conducted on August 24, 2022 however the property owner could not be contacted. A windshield study conducted at the time of the site visit observed beef cattle on the property. The possible barn was, therefore, evaluated as an occupied livestock barn. The MDS calculations are found in Appendix A to this letter.

Based on the size of the possible barn, the MDS calculation resulted in a minimum separation distance of **376.0 metres** for Type B Land uses. The actual separation distance to the subject property is approximately **185.1 metres**. Per Guideline #34, the proposed development will consist of Type B (more sensitive) uses, including the main lodge, camper accommodations, and the medical building. All Type B buildings will comply with the minimum separation distance. The Type B setback is depicted in Figure 1, below.

However, the proposed development also includes Type A (less sensitive) uses that serve as accessory uses to the main camp use, such as the stable and maintenance building. While these uses are accessory to the main functions of the camp, they are distinct in that they are unoccupied and uninhabited buildings, with only limited human activity. This is consistent with the definition of Type A uses, as outlined per Guideline #33. Type A land uses are subject to MDS I setbacks that are half the distance of Type B land uses. Accordingly, a reduced minimum separation distance of **188 metres** applies to these uses. All less sensitive uses will comply with the Type A minimum separation distance. The Type A setback is depicted in Figure 2, below.

Furthermore, Guideline #13 considers the non-application of MDS I setbacks to accessory structures. While the formulae does not explicitly contemplate tourist commercial uses, as proposed on the site, this Guideline is intended to exempt unoccupied accessory buildings from MDS provisions, including, but not limited to: decks, garages, gazebos, greenhouses, outbuildings, patios, picnic areas and sheds. It is our opinion that the intention of the Guidelines is to clarify that accessory structures may be exempt from MDS setbacks altogether, despite being accessory to a more sensitive use. This exemption applies to structures which are clearly uninhabited, with low levels of human activity. In this case, all sensitive uses (i.e.: camper accommodations, lodge, and medical building) are considered Type B sensitive uses, but the maintenance building and stable are recognized as Type A less sensitive uses. As such, the proposed maintenance building and stable (and any other similar accessory structures), should be exempt from MDS I setbacks.

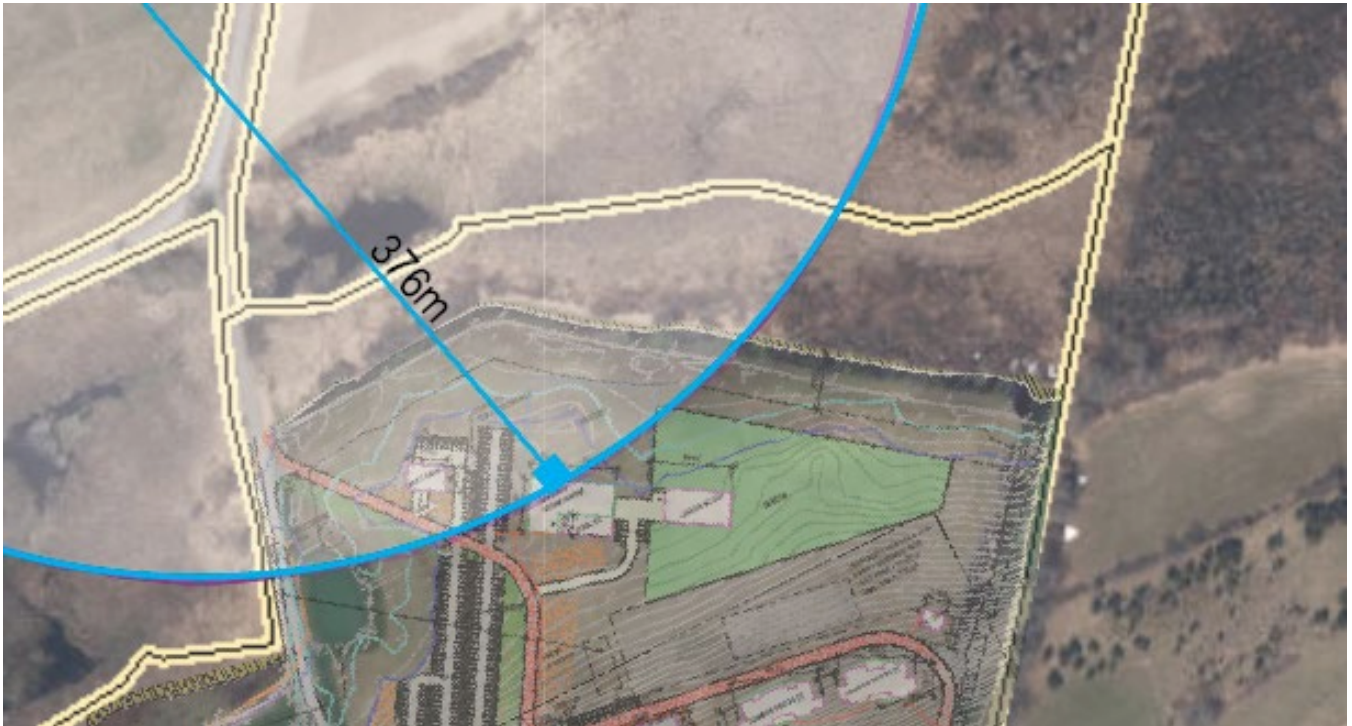


Figure 1: Type B Minimum Distance Separation Setback (Source: Fotenn Planning + Design)

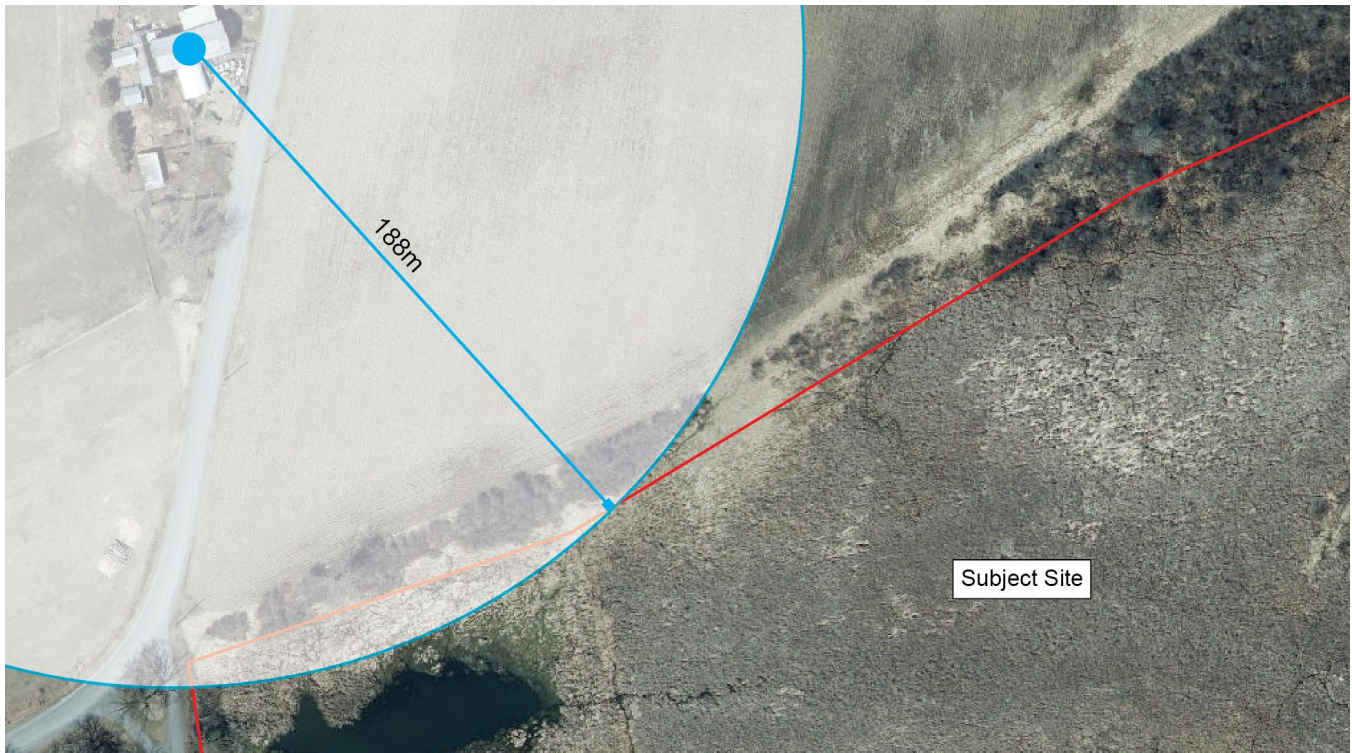


Figure 2: Type A Minimum Distance Separation Setback (Source: Fotenn Planning + Design)

Barn #2 – 357 Wesley Acres Road

The property at 357 Wesley Acres Road is located northeast of the subject property on the south side of Wesley Acres Road. The property contains various agricultural buildings, including one barn. The lot area is approximately 37.6 hectares. A site visit was conducted on August 24, 2022 however the property owner could not be contacted. A windshield study conducted at the time of the site visit could not confirm the presence of livestock on the property, though dairy cattle are depicted on a farm sign on the property. The possible barn was, therefore, evaluated as an unoccupied livestock barn. The MDS calculations are found in Appendix A to this letter. Based on the size of the possible barn, the MDS calculation resulted in a minimum separation distance of **750 metres**. The actual separation distance to the subject property is approximately **886 metres**. As such, the livestock facilities at 357 Wesley Acres Road will have no impact on the proposed development.

Barn #3 – 768 County Road 12

The property at 768 Wesley Acres Road is located east of the subject property on the west side of County Road 12. The property contains a dwelling and agricultural accessory buildings, including a possible barn. The lot area is approximately 3.0 hectares. A site visit was conducted on August 24, 2022 however the property owner could not be contacted. The site visit confirmed that the majority of the buildings contain commercial uses in the form of a retail store. Goats were observed on the property, habituating a small portion of the possible barn. The habitable portion of the possible barn was therefore evaluated as an occupied livestock barn. The MDS calculations are found in Appendix A to this letter. Based on the size of the possible barn, the MDS calculation resulted in a minimum separation distance of **162 metres**. The actual separation distance to the subject property is approximately **687.0 metres**. As such, the livestock facilities at 768 County Road 12 will have no impact on the proposed development.

Conclusion

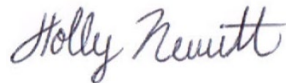
The applicant is seeking to develop the property at 565 Wesley Acres Road to support a camp that supports kids and families affected by childhood cancer. New proposed structures will be required to locate outside of the identified barn setbacks, unless relief is granted through a Zoning By-law Amendment or Minor Variance process.

Should you have any questions or comments, please do not hesitate to contact me at 613.542.5454 x 321 or weekes@fotenn.com.

Respectfully submitted,



Miles Weekes, MCIP RPP
Senior Planner
Fotenn Planning + Design



Holly Newitt, MCIP RPP
Planner
Fotenn Planning + Design


565 Wesley Acres

General information

Application date
Feb 18, 2025

Municipal file number

Proposed application
Other Type B land use


Applicant contact information 

ON

Location of subject lands
County of Prince Edward
County of Prince Edward
HALLOWELL
Concession 1 MILITARY TRACT , Lot 2
Roll number: 1350

Calculations

357 Wesley Acres

Farm contact information 



ON

Location of existing livestock facility or anaerobic digester
 County of Prince Edward
 County of Prince Edward
 HALLOWELL
 Concession 1 MILITARY TRACT , Lot 2
 Roll number: 1350

Total lot size
 37.6 ha


Livestock/manure summary

Manure Form	Type of livestock/manure	Existing maximum number	Existing maximum number (NU)	Estimated livestock barn area
Solid	Unoccupied Livestock Barn	2294 m ²	114.7 NU	2294 m ²

-  **Confirm Livestock/Manure Information (357 Wesley Acres)**
 The livestock/manure information has not been confirmed with the property owner and/or farm operator.
-  **Unoccupied Barn or Unused Storage (357 Wesley Acres)**
 The calculated setback is based on assumptions for an unoccupied barn or unused storage that may not reflect the actual design capacity.

Setback summary

Existing manure storage	No storage required (manure is stored for less than 14 days)		
Design capacity	114.7 NU		
Potential design capacity	344.1 NU		
Factor A (odour potential)	1	Factor B (design capacity)	486.61
Factor D (manure type)	0.7	Factor E (encroaching land use)	2.2
Building base distance 'F' (A x B x D x E) (minimum distance from livestock barn)			750 m (2461 ft)
Actual distance from livestock barn			NA
Storage base distance 'S' (minimum distance from manure storage)			No existing manure storage
Actual distance from manure storage			NA

Farm contact information 

ON

Location of existing livestock facility or anaerobic digester
County of Prince Edward
County of Prince Edward
HALLOWELL
Concession 1 MILITARY TRACT , Lot 1
Roll number: 1350

Total lot size
26 ha

Livestock/manure summary

Manure Form	Type of livestock/manure	Existing maximum number	Existing maximum number (NU)	Estimated livestock barn area
Solid	Beef, Cows, including calves to weaning (all breeds), Yard/Barn	44	44 NU	204 m ²



Confirm Livestock/Manure Information (528 Wesley Acres)

The livestock/manure information has not been confirmed with the property owner and/or farm operator.

Setback summary

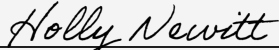
Existing manure storage	V1. Solid, inside, bedded pack		
Design capacity	44 NU		
Potential design capacity	132 NU		
Factor A (odour potential)	0.7	Factor B (design capacity)	347.97
Factor D (manure type)	0.7	Factor E (encroaching land use)	2.2
Building base distance 'F' (A x B x D x E) (minimum distance from livestock barn)	376 m (1234 ft)		
Actual distance from livestock barn	NA		
Storage base distance 'S' (minimum distance from manure storage)	No existing manure storage		
Actual distance from manure storage	NA		

Preparer signoff & disclaimer

Preparer contact information

Holly Newitt
Fotenn Planning + Design
ON

Signature of preparer



Holly Newitt, Planner

2.24.2025

Date (mmm-dd-yyyy)

Note to the user


The Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) has developed this software program for distribution and use with the Minimum Distance Separation (MDS) Formulae as a public service to assist farmers, consultants, and the general public. This version of the software distributed by OMAFRA will be considered to be the official version for purposes of calculating MDS. OMAFRA is not responsible for errors due to inaccurate or incorrect data or information; mistakes in calculation; errors arising out of modification of the software, or errors arising out of incorrect inputting of data. All data and calculations should be verified before acting on them.

© King's Printer for Ontario, 2012-25

MDS I

General information


Application date Aug 25, 2022	Municipal file number	Proposed application Other Type A land use
----------------------------------	-----------------------	---

Applicant contact information 
ON

Location of subject lands
County of Prince Edward
County of Prince Edward
HALLOWELL
Concession 1 MILITARY TRACT , Lot 2
Roll number: 1350

Calculations


New farm

Farm contact information 
ON

Location of existing livestock facility or anaerobic digester County of Prince Edward County of Prince Edward HALLOWELL Concession 1 MILITARY TRACT , Lot 1 Roll number: 1351	Total lot size 26 ha
--	-------------------------

Livestock/manure summary

Manure Form	Type of livestock/manure	Existing maximum number	Existing maximum number (NU)	Estimated livestock barn area
Solid	Beef, Cows, including calves to weaning (all breeds), Yard/Barn	44	43.9 NU	204 m ²

 **Confirm Livestock/Manure Information (New farm)**
The livestock/manure information has not been confirmed with the property owner and/or farm operator.

Setback summary

Existing manure storage	V1. Solid, inside, bedded pack	
Design capacity	43.9 NU	
Potential design capacity	131.8 NU	
Factor A (odour potential)	0.7	Factor B (design capacity) 347.75
Factor D (manure type)	0.7	Factor E (encroaching land use) 1.1
Building base distance 'F' (A x B x D x E) (minimum distance from livestock barn)		188 m (617 ft)
Actual distance from livestock barn		NA
Storage base distance 'S' (minimum distance from manure storage)		188 m (617 ft)
Actual distance from manure storage		NA

Preparer signoff & disclaimer

Preparer contact information
ON

Signature of preparer

Holly Newitt

2.24.2025

Date (mmm-dd-yyyy)

Note to the user

The Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) has developed this software program for distribution and use with the Minimum Distance Separation (MDS) Formulae as a public service to assist farmers, consultants, and the general public. This version of the software distributed by OMAFRA will be considered to be the official version for purposes of calculating MDS. OMAFRA is not responsible for errors due to inaccurate or incorrect data or information; mistakes in calculation; errors arising out of modification of the software, or errors arising out of incorrect inputting of data. All data and calculations should be verified before acting on them.