



PLANNING ADDENDUM LETTER

Flatt Point Subdivision (OPA, ZBA, DPS, DPC) - 3401 County Road 13

Prince Edward County

Municipal File No. 13-T-21-505, 13-T-21-506, OPA-06-21 & Z37-21

Applicant: 712223 NB Ltd. c/o Michael Kerford

December 22, 2025

This Letter is provided as an Addendum to the June 2021 Planning Rationale and Demonstration Report prepared by IBI Group in support of the above-noted applications. The 2021 Report included an assessment of the applications against the policies of the 2020 Provincial Policy Statement, 1998 Official Plan and newly adopted 2021 Official Plan, noting that the applications were filed and continue to be subject to the policies of the 1998 Official Plan (January 2011 consolidation).

The assessment and findings of the 2021 Report remain valid, and it should be read together with this Addendum, which provides an update thereto and addresses the following:

1. Summary of revisions/updates to the applications;
2. Consistency of the proposed subdivision design with the Shore Lands policies of the 2011 consolidation of the Official Plan, including the Shore Land Subdivision Concepts in Appendix 'A' and associated policies; and
3. Consistency of the applications with the Provincial Planning Statement, 2024.

This Addendum accompanies a comprehensive resubmission made in reply to September 2025 Staff Technical Review Comments, and we would refer to that resubmission package for further supporting materials and information.

1. Revisions to the Applications

Since filing the original applications, a number of resubmissions have been made responding to Staff, agency and peer review comments. This includes updated technical reports and iterative changes to the subdivision design and layout. Of particular note, the access road to the subdivision has been confirmed as being

“Access A” (or Option A), providing access to the main subdivision development lands from County Road 13 via the neighbouring property. “Access B” (or Option B) was via the unimproved municipal road allowance that traversed the west side of the subject property from County Road 13. A Consent application to create the Option A private road access was filed in May 2025 and the Public Meeting was held in November 2025.

Other changes include designating the development parcel at the southeast corner of the lands as “Lot 17” rather than as “Other Lands owned by the Applicant”. This change was made in conjunction with the confirmed Option A access and based on the understanding that the municipal staff were not going to be seeking public parkland dedication, the only potentially viable location for which would have been within the “Other Lands” / Lot 17 portion of the subject property. The access to Lot 17 will continue to be directly from County Road 13, noting that these lands are already zoned for development with a single-detached dwelling, as established through a previous set of approvals.

A contemplated shared waterfront access block between Lots 10 and 11 was removed as it is not needed since the majority of lots have their own water frontage. The four lots without direct frontage (13-16) would have pedestrian access to the water through the common OS/EP area found in Block 18.

Water servicing for the individual lots was originally contemplated as individual drilled wells, but ongoing investigations and the municipal and peer review process led to the current approach of using shore wells. This approach has been assessed by both the proponent’s professional engineer (Malroz) and the municipality’s peer reviewer (Cambium), and we understand that it has been accepted in principle, with any further detailed design and review to be provided as a condition of Draft Plan approval.

A recommendation of the natural heritage consultant that a 50-metre naturalized area be maintained at the rear of each of Lots 1-16 is shown on the updated Concept Plan. This is proposed to be implemented through the site-specific zoning as a setback requirement, and would also apply to the wetland setback for Lot 17.

2. Consistency of Subdivision Design with Shore Land Subdivision Concepts

The 2021 Planning Rationale Report included a fulsome assessment of the proposed applications and subdivision design against the applicable Shore Land policies of the Official Plan, including the Shore Land Subdivision Concepts in Appendix ‘A’ to the Plan. There are three “concept drawings” included in Appendix ‘A’ that the Official Plan indicates are intended to “provide guidance in designing Shore Land residential

development” (Part IV, Section 4.4.2.h). This language indicates that there is a certain amount of flexibility in how the Concepts are to be applied by using the term “guidance” rather than “direction”, noting that the policies for each of the three shoreline subdivision types indicates “shall” in their respective preambles. The 2021 Report indicated that the contemplated subdivision design did not “directly correlate to any of the three sample subdivision design/layout styles”. The current design aligns with the Cluster Subdivision policies, as follows:

Part IV, Section 4.4.2.h.ii – Cluster Subdivisions (Figure 2):

- *Have a minimum lot area of 0.80 hectares:*

Response: proposed lots range in area from 0.81 to 1.23 hectares.

- *Contain a minimum of 3 and a maximum of 15 lots*

Response: 16 lots are proposed in the primary subdivision area, with the 17th lot as an isolated parcel separate from the remainder of the subdivision. It is my professional opinion that these 16+1 lots are consistent with the intent of the Official Plan to limit the size of subdivisions in the Shore Land area. Given the overall scale of the property and lots, including Block 18 and the increased 50 m woodland/waterfront protection area, as well as its condominium road nature, the proposed number of lots will not create the appearance of or constitute overdevelopment. The site-specific policy area to be created through the subject applications can establish the maximum number of lots permitted for the subject lands.

- *provide a minimum common shoreline frontage held in one continuous parcel of 10 metres for every lot not fronting on water*

Response: Block 18 is a 4.08 hectare lot with approximately 450 m of water frontage. This Block is proposed to be a mix of Open Space and Environmental Protection, with the latter intended to recognize two wetland cells. The Open Space portion outside of the wetlands can provide access to the waterfront, with the beach area providing contiguous access along the whole of Block 18.

- *be developed with an appropriate level of water and sewage treatment systems as required in Part III, Section 2.6 of this Plan*

Response: Per policy 2.6.2, servicing options have been assessed through the Hydrogeological study and Terrain Analysis, including updates thereto and review by Staff and an external peer reviewer. Per the December 2025 Hydrogeological Addendum Letter prepared by Malroz, wells (and particularly shore wells) are identified as an appropriate form of water servicing for the

subdivision, with communal services seen as infeasible. Based on policy 2.6.3, private servicing is therefore permitted.

- *provide communal recreational facilities such as a dock for use by the subdivision residents, on common shoreline frontage*

Response: Given that all but four lots have water access, it is anticipated that there is limited need for a communal recreational facility, but the shoreline associated with Block 18 can be used for common waterfront access, including launching for canoes or similar, where desired.

- *be serviced by internal roads with a minimum number of accesses to a public road*

Response: There is proposed to be one condo/private internal road that connects to County Road 13 that would service Lots 1-16. Lot 17 would continue to be accessed by an existing shared entrance at the southeast end of the property that also serves as the access for two other properties to the southeast.

Because this is a condominium road, individual driveway access to public roads is not applicable. However, we provide comment on the use of shared driveways for individual lots in our December 22, 2025 Response to Staff Technical Review comments.

3. Consistency of Applications with the Provincial Planning Statement, 2024

The Provincial Planning Statement, 2024 (PPS), is a policy statement issued under the authority of Section 3 of the *Planning Act* and came into effect on October 20, 2024. The PPS replaced the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe 2019 (APTG), as amended in 2020. The 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. While the applications are subject to the previous iteration of the municipality's Official Plan, any decision of Council must be consistent with the 2024 PPS.

The following policies of the PPS are directly relevant to the subject applications:

2.3.1 General Policies for Settlement Areas

- 1. Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.*

Response: The PPS identifies settlement areas as the “focus” of growth and development, but this does not mean that it is the only area where growth can or will occur. This policy direction is expanded on elsewhere, including where the PPS identifies that residential development is permitted in “Rural Areas” and on “Rural Lands” within a municipality.

2.5 Rural Areas in Municipalities

- 1. Healthy, integrated and viable rural areas should be supported by:
 - a) building upon rural character, and leveraging rural amenities and assets;*
 - b) promoting regeneration, including the redevelopment of brownfield sites;*
 - c) accommodating an appropriate range and mix of housing in rural settlement areas;*
 - d) using rural infrastructure and public service facilities efficiently;*
 - e) promoting diversification of the economic base and employment opportunities through goods and services, including value-added products and the sustainable management or use of resources;*
 - f) providing opportunities for sustainable and diversified tourism, including leveraging historical, cultural, and natural assets;*
 - g) conserving biodiversity and considering the ecological benefits provided by nature; and*
 - h) providing opportunities for economic activities in prime agricultural areas, in accordance with policy 4.3.**
- 2. In rural areas, rural settlement areas shall be the focus of growth and development and their vitality and regeneration shall be promoted.*
- 3. When directing development in rural settlement areas in accordance with policy 2.3, planning authorities shall give consideration to locally appropriate rural characteristics, the scale of development and the provision of appropriate service levels.*

Growth and development may be directed to rural lands in accordance with policy 2.6, including where a municipality does not have a settlement area.

Response: While identifying that settlement areas are to be the “focus of growth”, the policies also identify that growth and development continues to be expected in rural areas. Within rural areas, rural settlement areas are intended to be the “focus of growth and development”, but growth and development is also contemplated on

rural lands more broadly, including those lands outside of rural settlement areas, subject to policy 2.6.

Figure 1, below, is a table from the Watson & Associates 2023 Development Charges Background Study for Prince Edward County, which indicates that 22% (866 units) of residential growth between 2023-2043 is anticipated to be accommodated in the Rural area. For the purposes of the Watson study, the Rural area includes rural settlement areas, such as Rednersville and Milford, as well as the broader “rural lands”. The subject applications would provide 17 of these anticipated 866 rural residential units. We note that this 22% does not include partially serviced settlement areas like Bloomfield, Ameliasburgh and Consecon, and that the vast majority of anticipated growth (78% or 3,055 units) will otherwise be focussed in fully or partially serviced settlement areas.

Development Location	Timing	Amount of Housing Growth	Percentage of Housing Growth
Picton	2023 - 2033	870	40%
	2023 - 2043	1,705	43%
Wellington	2023 - 2033	710	33%
	2023 - 2043	1,233	31%
Urban Subtotal (Fully Serviced)	2023 - 2033	1,580	73%
	2023 - 2043	2,937	75%
Bloomfield	2023 - 2033	30	1%
	2023 - 2043	51	1%
Rossmore	2023 - 2033	12	1%
	2023 - 2043	24	1%
Concsecon	2023 - 2033	11	1%
	2023 - 2043	25	1%
Ameliasburgh	2023 - 2033	15	1%
	2023 - 2043	17	0%
Urban Subtotal (Water Only)	2023 - 2033	68	3%
	2023 - 2043	118	3%
Rural	2023 - 2033	514	24%
	2023 - 2043	866	22%
Prince Edward County	2023 - 2033	2,163	100%
	2023 - 2043	3,921	100%

Note: Figures may not sum precisely due to rounding.

Source: Watson & Associates Economists Ltd., 2022.

Figure 1: Figure from 2023 Watson & Associates Development Charges Background Study for Prince Edward County (page 3-7).

2.6 Rural Lands in Municipalities

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

Response: Residential development is proposed through the creation of new lots and development with single-detached dwellings. Servicing studies, including Hydrogeological and Terrain Analysis reports have demonstrated that the proposed lots can be appropriately serviced, consistent with these policies.

2. *Development that can be sustained by rural service levels should be promoted.*
3. *Development shall be appropriate to the infrastructure which is planned or available, and avoid the need for the uneconomical expansion of this infrastructure.*

Response: As noted above, it has been demonstrated that the subject lands can be sustained by private, individual services. It is not anticipated that there will be any other demands on rural services or infrastructure that cannot be provided, and it is not anticipated that there will be a need to expand municipal infrastructure, particularly given the private/condo road nature of the development.

4. *Planning authorities should support a diversified rural economy by protecting agricultural and other resource-related uses and directing non-related development to areas where it will minimize constraints on these uses.*
5. *New land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.*

Response: There are no known aggregate or other designated resources on or in proximity to the subject lands. A Minimum Distance Separation assessment was completed and no conflicts with agricultural operations were identified.

2.9 Energy Conservation, Air Quality and Climate Change

1. *Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that:*
 - a) *support the achievement of compact, transit-supportive, and complete communities;*
 - b) *incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities;*
 - c) *support energy conservation and efficiency;*
 - d) *promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality; and*
 - e) *take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the impacts of a changing climate.*

Response: Within the context of policies that support provision of a range of housing options in both settlement areas and rural areas of a municipality, the engineering design for the proposed development will take into account provision of low impact development (LID) approaches to stormwater management, development will be located outside of areas subject to flooding based on updated Conservation Authority flood hazard mapping, can support resiliency by (for example) increasing food security by accommodating “kitchen gardens” on each lot, and infrastructure can be designed to accommodate charging for EV vehicles and use of solar, geothermal and other on-site renewable energy sources.

3.6 Sewage, Water and Stormwater

4. *Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts.*

At the time of the official plan review or update, planning authorities should assess the long-term impacts of individual on-site sewage services and individual on-site water services on environmental health and the financial viability or feasibility of other forms of servicing set out in policies 3.6.2 and 3.6.3.

Response: Municipal sewage and water services are not available or planned, and the hydrogeological assessment and supporting investigations identified that communal

services are generally infeasible. It has been demonstrated that the subject lands can be sustained by private, individual services, and that there is not anticipated to be any negative impacts.

4.1 Natural Heritage

1. *Natural features and areas shall be protected for the long term.*
2. *The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.*
5. *Development and site alteration shall not be permitted in:*
 - a) *significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1;*
 - b) *significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);*
 - c) *significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);*
 - d) *significant wildlife habitat;*
 - e) *significant areas of natural and scientific interest; and*
 - f) *coastal wetlands in Ecoregions 5E, 6E and 7E1 that are not subject to policy 4.1.4.b), unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.*
8. *Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.*

Response: An Environmental Impact Statement (EIS) has been completed that assessed the presence and extent of the above natural heritage features. Where such features were identified, the EIS also identifies what mitigation measures are required, if any, to ensure compliance with Federal and Provincial legislation and consistency with the PPS.

There are no identified Significant Woodlands on-site, but the EIS recommends that certain wooded areas of the site be maintained with limited disturbance. Similarly, non-significant coastal wetland is located on-site and off-site, and the EIS assessed

the impact of development and identified minimum setbacks to ensure no negative impacts on the wetland or its function.

Significant Wildlife Habitat was identified on the adjacent lands (subject to Consent application for private road access), and further assessment has resulted in recommendations for how development can proceed while avoiding negative impacts to this feature, in accordance with applicable regulations and policies.

Fish Habitat associated with Lake Ontario was also assessed, and the recommended setbacks for development will ensure that the natural heritage feature is protected.

4.6 Cultural Heritage and Archaeology

1. *Protected heritage property, which may contain built heritage resources or cultural heritage landscapes, shall be conserved.*
2. *Planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved.*

Response: Stage 1/2 and Stage 3 Archaeological Assessments have completed to identify archaeological resources. A Stage 4 Assessment is to be completed as a condition of Draft Plan of Subdivision approval, with the affected area subject to a holding 'H' provision.

There are no identified built heritage resources or designated cultural heritage landscapes.

5. *Planning authorities shall engage early with Indigenous communities and ensure their interests are considered when identifying, protecting and managing archaeological resources, built heritage resources and cultural heritage landscapes.*

Response: Indigenous communities were consulted through PEC's consultation process, including circulation of details of the applications to the identified list of First Nations and follow-up communications with additional information sharing upon the request of two of the First Nations. One First Nation also participated in the archaeological assessment and review process, as coordinated by the archaeologist.

5.2 Natural Hazards

1. *Planning authorities shall, in collaboration with conservation authorities where they exist, identify hazardous lands and hazardous sites and manage development in these areas, in accordance with provincial guidance.*
2. *Development shall generally be directed to areas outside of:*

- a) hazardous lands adjacent to the shorelines of the Great Lakes - St. Lawrence River System and large inland lakes which are impacted by flooding hazards, erosion hazards and/or dynamic beach hazards;
- b) hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards; and
- c) hazardous sites.

Response: Quinte Conservation has reviewed the subject applications and has not identified any concerns or objections. The proposed development is located outside of natural hazards, per Quinte Conservation's latest flood hazard mapping.

Conclusion

Based on the above, it is my professional opinion that the subject applications continue to conform to the policies of the applicable Official Plan, as proposed to be amended, and are consistent with the Provincial Planning Statement, 2024.

Sincerely,

The Boulevard Group



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Principal, Urban Planner

Cc. 712223 NB Ltd. c/o Michael Kerford