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August 12, 2024

**VIA EMAIL**

Connor McIsaac  
Planner II  
Town of Niagara on the Lake  
1593 Four Mile Creek Road  
Virgil, Ontario  
L0S 1T0

**RE: File No. ZBA-11-2024 & File No. ZBA-11-2024  
181 Hunter Road & 855 Line 2 Road, Niagara on the Lake  
Zoning By-law Application & Consent Application**

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**Introduction**

We are pleased to submit this addendum to the Planning Justification Report (PJR) that was submitted on June 28, 2024, as part of the concurrent Zoning By-law Amendment and consent applications for 181 Hunter Road and 855 Line 2 Road in the Town of Niagara-on-the-Lake (the "Subject Lands"). Town Staff have conducted a thorough review of the submitted application materials. This addendum letter is created in response to Town comments.

Please refer to the tables below for staff comments and NPG's responses.

**Table 1 – 855 Line 2 Road**

<i>Comment</i>	<i>Response</i>
Quantify and provide an analysis of the lands utilized for agricultural purposes that are anticipated to be lost as a result of the proposed severance, including what the lands are currently utilized for, what they are proposed to be utilized for (i.e., confirm they will no longer be utilized for farming	According to the PJR, approximately 1,300 m <sup>2</sup> of grapevines will need to be removed to meet the minimum size requirements for the proposed residential lot. This will likely involve removing sections of approximately ten rows of grapevines along the length of the

<p>operation), how the lot lines were located to minimize the impact on the remaining farm operation, and the impact of the removal of these lands on the viability of the remaining farm parcel.</p>	<p>proposed residential lot (Part 1). The area currently occupied by grapevines is expected to be converted to grass.</p> <p>The removal of grapevines is necessary to meet the 0.4-hectare requirement for a residence surplus to a farming operation as per Section 4.1.5.2 b of the Niagara Official Plan. This minimum lot size is required to accommodate a replacement septic system in the event of failure.</p> <p>The proposed parcel configuration maintains depths consistent with established rural character where the residential and agricultural uses interface, reducing the potential for land use compatibility conflicts.</p>
<p>Town Staff request confirmation that the barn structure located on Part 1 is proposed to be utilized for residential purposes only. The text should be modified to reflect the residential use (labelled as accessory farm structure, barn or garage in different sections) within the report.</p>	<p>The barn structure that is located on Part 1 is to be utilized for residential purposes only.</p>

**Table 2 – 181 Hunter Road**

<i>Comment</i>	<i>Response</i>
<p>Please include proposed frontage for agricultural parcel.</p>	<p>The lot frontage on the Retained Parcel is 97.407-metres (148.553-metres - 51.146-metres). The proposed and existing side lot lines are parallel, so the frontage is the horizontal distance between them, measured along the front lot line.</p> <p>Please see the attached consent sketch.</p>
<p>Town staff have identified chicken barns approximately 600 meters from the subject site.</p> <p>Please include a brief overview of the Minimum Distance Separation (MDS)</p>	<p>There is chicken barns located approximately 600 metres from the Subject Lands which front on Wall Road in Niagara on the Lake.</p> <p>However, according to Guideline #9, bullet 1 of the MDS, MDS I is not required where</p>

<p>guidelines applicable, and any analysis required.</p>	<p>the existing dwelling to be severed and the nearby livestock facility or anaerobic digester are located on separate lots prior to the consent.</p> <p>For this reason, the MDS formula is not applicable.</p>
<p>Town staff request confirmation that the barn structure located on Part 1 is proposed to be utilized for residential purposes only.</p>	<p>The barn structure located on Part 1 will be utilized for residential purposes only.</p>
<p>Town staff request confirmation that any agricultural uses currently located on Part 1, including storage, will be removed, if applicable, in order to comply with the new Rural Site-Specific Zone.</p>	<p>There are no active agricultural uses on Part 1.</p>

**CONCLUSION**

We trust the above is satisfactory, and should you require anything further or have any questions, please do not hesitate to contact the undersigned.

Yours Truly,



**Robert Smit, MSc RPD**  
 Planner  
**NPG Planning Solutions Inc.**



**Jesse Auspitz, MCIP, RPP**  
 Principal Planner, Toronto  
**NPG Planning Solutions Inc.**