

# **Planning Justification Report**

**In Support of  
Official Plan Amendments  
and  
Consent Applications  
for  
8940 Wellington Road 124  
Town of Erin**

May, 2020

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## Table of Contents

1. Introduction.....	1
1.1 Background.....	1
1.2 Study Purpose.....	1
1.3 Pre-Consultation Meetings.....	1
2. Site Context.....	1
2.1 Property Description.....	1
2.2 Existing Land Use.....	1
2.3 Surrounding Land Uses.....	2
3. The Proposal.....	2
4. Planning Policy and Regulatory Context.....	2
4.1 Provincial Policy Statement 2020 (PPS 2020).....	2
4.2 Growth Plan for the Greater Horseshoe (Growth Plan).....	5
4.3 Wellington County Official Plan (County OP).....	8
4.4 Town of Erin (Erin OP).....	10
4.5 Town of Erin Zoning Bylaw.....	13
5. Planning Considerations.....	14
5.1 Land Use Compatibility.....	14
5.2 Agricultural Impact.....	14
5.3 Environmental Impacts.....	14
5.4 Servicing.....	15
5.5 Access.....	15
5.6 Noise Impacts.....	15
5.7 Archaeological Resources.....	15
6. Conclusions.....	16

## Figures

Figure 1.....	3
Figure 2.....	11

# **1. Introduction**

## **1.1. Background**

This planning justification report (PJR) has been prepared in support of proposed Official Plan amendments to the County of Wellington Official Plan and Town of Erin Official Plan and applications to the Wellington County Land Division Committee to support three (3) consent applications on the lands subject to the amendments. The intent of the proposed Official Plan amendments is to extend the settlement area boundary for the Hamlet of Ospringe to include a portion of the lands to which the consent application apply.

## **1.2. Study Purpose**

The purpose of the PJR is to provide background information and a professional planning opinion in support of the proposed Official Plan amendments and consent applications. The PJR will review the proposal in the context of the site location and surrounding area; and consider the proposal in terms of applicable Provincial, County and Town policies and regulations; and other planning considerations.

## **1.3. Pre-Consultation Meetings**

There have been several discussions regarding the proposal with County and Town planning staff to review the proposal for the property. A formal Zoom pre-consultation meeting was held with County and Town planning staff on May 15, 2020. This submission is intended to address the matters raised during the pre-consultation discussion.

# **2. Site Context**

## **2.1. Property Description**

The subject lands consist of Part of Lot 13, Concession 3 and all of Block 44, Plan 61M-118 in the Town of Erin, County of Wellington, and are known municipally as 8940 Wellington Road 124 (WR 124). The subject lands consist of approximately 2.9 ha. and are located between Wellington Road 124 and Stewart Drive.

The severance sketch showing the proposed severance and the location of the subject lands is attached as Appendix 1.

## **2.2. Existing Land Use**

The area subject to the proposed consent application is currently vacant. The retained lot contains an existing single detached residence.

### 2.3. Surrounding Land Uses

The surrounding land uses are shown on the attached aerial photograph, (Figure 1) and can be described as follows:

- West – single detached residential lots
- North – an existing plan of subdivision of single detached lots
- East – a natural area owned by GRCA
- South – large rural residential lots

### 3. The Proposal

A small portion of the subject property is located within the settlement boundary of the Hamlet of Osprunge. A larger portion of the lands is located outside and adjacent to the hamlet boundary. The proposed amendments to the County Official Plan and the Town's Official Plan are intended to incorporate the remaining lands which are subject to the consent applications into the settlement area.

In 2017 the owner of the lands applied for two consents (Consent Application B99/17 and B100/17). These lots were intended to front on WR 124. The owner subsequently acquired Block 44, Plan 61M-118 in March 2019 from the Town of Erin. This acquisition provided access to Stewart Drive in the adjacent plan of subdivision. An additional consent application was made (Consent Application B47/19) to create a third residential lot. Access to the proposed lots is to be from Stewart Drive.

The consent applications were refused by the Wellington County Land Division Committee on October 10, 2019. The owner, through his legal counsel, appealed that decision to the Local Planning Appeal Tribunal (LPAT). Subsequently, based on further discussions, the owner decided to apply for Official Plan amendments to bring the remaining portion of the lands into the Osprunge settlement area. The LPAT appeals have been deferred pending the outcome of the plan amendment applications.

### 4. Planning Policy and Regulatory Context

#### 4.1. Provincial Policy Statement 2020

The Provincial Policy Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development. The Provincial Policy Statement is issued under the authority of Section 3 of the Planning Act and the current PPS came into effect May 1, 2020. Section 3 requires that *“the decisions affecting planning matters shall be consistent with policy statements issued under the Act.”*

Provincial Plans, such as the Growth Plan for the Greater Golden Horseshoe, build upon the policy foundation of the PPS. Provincial plans *“take precedence over the policies of*

Figure 1



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*the Provincial Policy Statement to the extent of any conflict.*” Part III of the PPS further states:

*“where the policies of provincial plans address the same, similar, related, or overlapping matters as the policies of the Provincial Policy Statement, applying the more specific policies of the provincial plan satisfies the more general requirements of the Provincial Policy Statement.”*

a) Relevant Policies

Applicable policies in the PPS 2020 include:

- Section 1.1.1 *“Healthy, liveable and safe communities are sustained by:*
  - a) *Promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;*
  - b) *Accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached,...)*
  - c) *Avoiding development and land use patterns which may cause environmental or public health and safety concerns.*
  
- Section 1.1.3.1 *“Settlement areas shall be the focus of growth and development.”*
  
- Section 1.1.3.2 *“Land use patterns within settlement areas shall be based on densities and a mix of land uses which:*
  - a) *efficiently use land and resources;*
  - b) *are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available.”*
  
- Section 1.1.3.8 *“A planning authority may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a comprehensive review.”* However Section 1.1.3.9 goes on to further state: *“Notwithstanding policy 1.1.3.8, municipalities may permit adjustments of settlement area boundaries outside a comprehensive review provided:*
  - a) *there would be no net increase in land within the settlement areas;*
  - b) *the adjustment would support the municipality’s ability to meet intensification and redevelopment targets established by the municipality;*
  - c) *prime agricultural areas are addressed in accordance with 1.1.3.8 (c), (d), and (e); and*
  - d) *the settlement area to which lands would be added is appropriately serviced and there is sufficient reserve infrastructure capacity to service the lands.”*
  
- Section 1.1.4.2 *“In rural areas, settlement areas shall be the focus of growth and development and their vitality and regeneration shall be promoted.”*

- Section 1.6.6.4 *“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. In settlement areas, individual on-site sewage services and individual on-site water services may be used for infilling and minor rounding out of existing development.”*

b) Summary of the relevant PPS 2020 policies:

- i. the PPS 2020 provides that where there is conflict with the policies of a Provincial Plan (such as the Growth Plan) the Provincial Plan takes precedence
- ii. the PPS 2020 policies encourage efficient development and land use patterns, accommodating a market-based range of residential types, which are appropriate for the infrastructure which is planned or available
- iii. the PPS 2020 indicates that in rural areas, rural settlement areas shall be the focus of growth and development
- iv. the PPS 2020 provides that where municipal or communal sewage and water services are not available, individual on-site sewage services and water services may be used for infilling and minor rounding out of existing development
- v. the PPS indicates that expansion of a settlement area boundary will generally be at the time of a municipal comprehensive review; however provides some exception for adjustments of settlement area boundaries outside a comprehensive review. It is noted that the Provincial Growth Plan provides policy which takes precedence over the PPS for settlement area boundary expansions.

#### 4.2. **Growth Plan for the Greater Horseshoe (Growth Plan)**

The Ministry of Public Infrastructure and Renewal released the Growth Plan for the Greater Golden Horseshoe to manage growth in Ontario under the authority of the Places to Grow Act 2005. An update of the Growth Plan came into effect on May 16, 2019 and any decisions made after that date that affect a planning matter must conform to the plan.

The Growth Plan provides an overall growth strategy for the Greater Golden Horseshoe region that complements the Provincial Policy Statement and is implemented by municipal planning documents. The key elements of the Growth Plan are guiding principles of building compact, vibrant and complete communities; planning and managing growth to support a strong, competitive economy; and optimizing the use of

existing or planned infrastructure to support growth in a compact and efficient form. As such, these policies are primarily directed at settlement areas.

The Town of Erin is part of the County of Wellington which is located within the Outer Ring of the Greater Golden Horseshoe Plan Area. The Growth Plan projects an increase in the population of the County to 140,000 persons by 2041. The 2016 population for the County of Wellington was approximately 96,000, so substantial growth is anticipated over the 25 year period from 2016 to 2041.

a) Relevant Policies

The following are relevant policies from the Growth Plan:

- Section 1.2.3 states *“Like other provincial plans, the 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.”*
- Section 1.2.1 Guiding Principles states that the policies of the Growth Plan *“Support the achievement of complete communities that are designed to support healthy and active living and meet people’s needs for daily living throughout an entire lifetime.”* and *“Support a range and mix of housing options, including second units and affordable housing, to serve all sizes, incomes and ages of households.”*
- Section 2.2.1.2 Managing Growth (Subsection 2 b.) indicates that *“growth will be limited in settlement areas that:*
  - i. are rural settlements;*
  - ii. are not serviced by existing or planned municipal water and wastewater systems; or*
  - iii. are in the Greenbelt Area;”*
- The Growth Plan defines “rural settlements” as; *“Existing hamlets or similar existing small settlement areas that are long-established and identified in official plans. These communities are serviced by individual private on-site water and/or private wastewater systems, contain a limited amount of undeveloped lands that are designated for development and are subject to official plan policies that limit growth. All settlement areas that are identified as hamlets in the Greenbelt Plan, as rural settlements in the Oak Ridges Moraine Conservation Plan, or as minor urban centres in the Niagara*



*Escarpment Plan are considered rural settlements for the purposes of this Plan, including those that would not otherwise meet this definition.”*

- The Growth Plan (2019) in Section 2.2.9.7 provides that; *“Notwithstanding policy 2.2.8.2, minor adjustments may be made to the boundaries of rural settlements outside of a municipal comprehensive review, subject to the following:*
  - a) the affected settlement area is not in the Greenbelt Area;*
  - b) the change would constitute minor rounding out of existing development, in keeping with the rural character of the area;*
  - c) confirmation that water and wastewater servicing can be provided in an appropriate manner that is suitable for the long-term with no negative impacts on water; and*
  - d) Section 2 (Wise Use and Management of Resources) and 3 (Protecting Public Health and Safety) of the PPS are applied.”*

b) Summary of Relevant Growth Plan Policies

- i. the policies of the Growth Plan take precedence over the policies of the PPS to the extent of any conflict
- ii. the policies of the Growth Plan support the achievement of complete communities and meet people’s needs for daily living throughout a lifetime
- iii. the Growth Plan provides for the limited development in rural settlements that are not serviced by existing or planned municipal water and wastewater systems
- iv. under the policies of the Growth Plan minor adjustments to the boundaries of rural settlements outside of a municipal comprehensive review subject to certain criteria addressed in this report which include:
  - a) that the affected settlement area is not in the Greenbelt Area;
  - b) that the change constitutes minor rounding out of existing development and in keeping with the rural character of the area; and
  - c) that water and wastewater servicing can be provided in an appropriate manner.

These criteria are addressed elsewhere in this report. It is also noted that the subject lands are not within the Greenbelt Area.

### 4.3. Wellington County Official Plan (County OP)

The Wellington County Official Plan came into effect on May 6, 1999. The Plan has subsequently been amended several times, including a comprehensive 5 Year Review (OPA 81) which was approved by MMAH on April 24, 2014, appealed to the Ontario Municipal Board and approved by the Board on December 19, 2014.

A small portion of the subject lands are designated Hamlet Area within the County OP and are located within the Ospringe hamlet area boundary. The remaining lands are located adjacent to the hamlet boundary and are designated Secondary Agricultural. The intent of the proposed County Official Plan amendment is to include the balance of the property within the Ospringe hamlet boundary and re-designate the lands to Hamlet Area.

#### a) Relevant Policies

The relevant policies of the County OP include:

- Section 4.8 Urban Expansion states in Section 4.8.1;  
*“The County wishes to encourage growth to occur in urban centres and hamlets...Hamlets are expected to be built out with only modest expansions allowed;”*  
and in Section 4.8.3 Hamlet Expansion;  
*“None of the hamlets in Wellington are on municipal services and it is the policy of this Plan to limit growth in areas without municipal services. Hamlet expansions of more than 5 residential lots or units will not be allowed. The expansion must be based on a municipal comprehensive review as set out in Section 4.8.2.”*
- Section 7.4 provides the detailed planning policies for Hamlets:  
*“7.4.1 Permitted Uses  
Development will be relatively small-scale given the rural context and level of service available in hamlets. The primary residential use will be low density single detached units...”*  
  
*“7.4.2 Servicing  
Sewage and water services will be provided in accordance with Section 11.2 of this Plan.  
Road access will be via internal roads where possible, then via local roads where possible and then via County Roads or Provincial Highways where there is no other alternative. In all cases appropriate siting standards must be met and road functions maintained.”*  
  
*“7.4.3 Land Use Compatibility  
i. In hamlets the establishing of specific areas for various land uses is normally left to the zoning by-law. In establishing zones, Councils shall*

*ensure that existing and proposed uses are compatible and that adverse impacts are kept to a minimum and that appropriate mitigation is provided where practical.”*

- Section 10.1.3 sets out the Matter for Consideration with regard to creating new lots:

*“The County will consider the following when considering new lot creation by subdivision, consent or part lot control:*

- a) that any new lots will be consistent with official plan policies and zoning regulations;*
- b) that all lots can be adequately serviced with water, sewage disposal, stormwater management or drainage, fire protection, roads, utilities, solid waste disposal to accepted municipal standards and without undue financial burden on the municipality;*
- d) that all lots will have safe driveway access to an all-season maintained public road and that access to a local road will be preferred over county and provincial roads, where practical;*
- e) that public streets, spaces and facilities will be safe, meet the needs of pedestrians, and facilitate pedestrian and non-motorized movement, including, but not limited to, walking and cycling;*
- f) that the topography, soils and drainage of the site are satisfactory for the lot sizes and uses proposed;*
- g) that tree loss related to anticipated development be kept to a minimum and, whenever reasonable, be compensated for by new tree planting;*
- h) that natural heritage features are not affected negatively;*
- i) that lots are not created in areas which would pose a threat to public health or safety;*
- j) that natural resources such as agricultural lands and mineral aggregates would not be affected adversely;*
- k) that the size and shape of proposed lots is suitable, including frontage, area and the proportion of frontage to depth;*
- l) that the proposed lots and uses are compatible with and designed to minimize adverse impacts on surrounding uses;*
- m) that all new lots shall have logical lot lines given existing lot patterns in the area, natural and human-made features and other appropriate considerations;*
- n) that residential lots will have adequate access to community facilities such as schools, libraries and parks based on reasonable standards for the area;*
- o) that the creation of any lot is necessary, timely and in the public interest;*
- p) that provincial legislation and policies are met, including the Greenbelt Plan policies set out in Section 9.9 of this Plan.”*

- Section 10.6.1 provide the following policy for lot creation in Hamlets:  
*“New lots may be created in Hamlets provided that the land will be appropriately zoned.  
 Lots may be created for a variety of community uses subject to the policies of this Plan.”*
- Section 11.2.5 Hamlet Servicing states:  
*“Municipal sewer and water services are not anticipated in hamlets. Individual on-site services will be the norm for most small developments. Existing smaller lots may be developed if an acceptable means of servicing can be provided.”*

b) Summary of Relevant County OP Policies

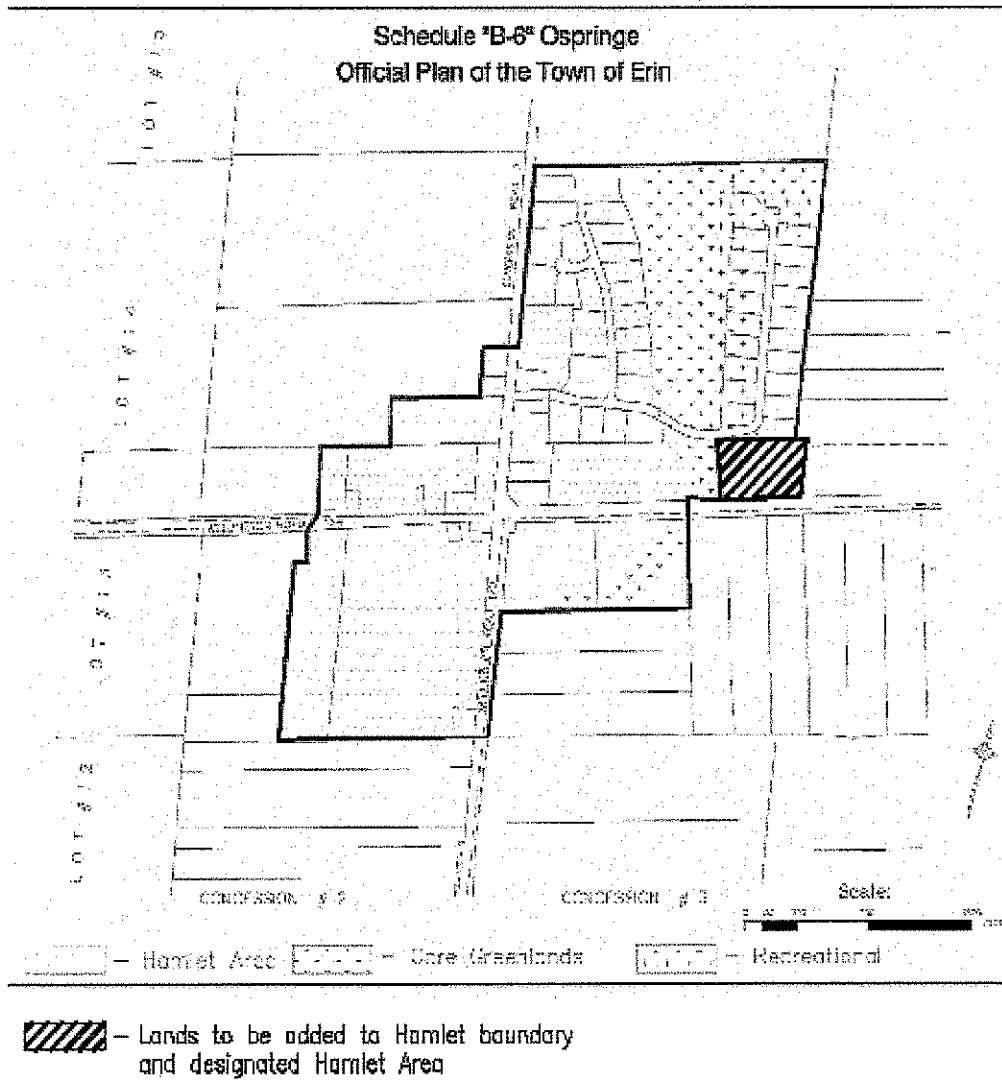
- i. The County OP policies encourage limited growth in the hamlets, and envisions modest expansions of hamlet boundaries for up to 5 lots.
- ii. The County OP requirement for a Municipal comprehensive review of a hamlet boundary expansion is now superseded by the recent amendment to the Provincial Growth Plan as set out in Section 4.2 of this report. The proposed Official Plan amendments therefore proposes to exempt the property from this policy.
- iii. Low density single detached units are to be the primary residential use in hamlets subject to adequate servicing being provided and compatibility with existing uses. These matters are discussed further in Section 5 of this report.
- iv. The proposed consents conform to the matters set out in Section 10.1.3 of the County OP. It is noted that one of the criteria to be met includes meeting Provincial legislation and policies.

**4.4. Town of Erin Official Plan (Erin OP)**

The Town of Erin Official Plan was approved by Wellington County Council on December 14, 2004, and has subsequently been amended several times. The OP has not been updated since 2012 to address new Provincial and County policies.

The Erin OP designates the subject property similarly to the County OP. The smaller portion of land within the hamlet boundary is designated Hamlet Area on Schedule B-6 Ospringe of the Plan. The portion outside the hamlet boundary is designated Secondary Agriculture on Schedule A-1. The intent of the proposed amendment is to include the balance of the subject property within the Ospringe hamlet boundary and to re-designate the lands as Hamlet Area, as shown on Figure 2, attached.

Figure 2



a) Relevant Policies

The relevant policies of the Erin OP include:

- Section 2.2.2 Residential Growth states that:  
*“That low density residential development, consisting of primarily single-detached dwellings, will continue to be the predominant form of housing given the lack of municipal sewers, but a variety of housing types will be encouraged.”*  
and,  
*“That new development be provided for primarily by the expansion of the existing settlement areas of Erin and Hillsburgh. Limited expansion of other hamlet areas will also be considered where appropriate.”*
- Section 4.5.1 Hamlets Introduction states:  
*“It is the intent of this Plan that some of the Town’s growth is to be directed to the six Hamlets. Some of these settlements have environmental constraints such as hazard lands and wetlands. Their growth potential is also limited by servicing constraints such as lack of municipal sewage treatment and water supply services, which are not currently available for any of the Hamlets. Therefore, the ability of these settlements to expand varies and in some cases, future development will be limited to minor infilling and rounding out.”*
- Section 4.5.2 Permitted Uses states:  
*“Generally, it is intended that development will be relatively small scale, given the essentially rural context of the Town. Residential development will be low density in order to maintain the existing visual qualities of a small village.”*
- Section 4.5.3 Lot Creation states:  
*“The creation of new lots shall occur in accordance with the policies Section 10 of the County of Wellington Official Plan.”*
- Section 4.5.6 Hamlet Expansion states:  
*“It is the policy of this Plan to limit growth in areas without municipal services. Hamlet expansions of more than 5 residential lots or units will not be allowed. The expansion must be based on a municipal comprehensive review that includes an analysis of need under the County’s growth strategy, alternative locations, and potential impacts.”*
- Section 5.15.2 Comments sets out policies for severances:  
*“Division of land by consent to sever may be permitted when a plan of subdivision is deemed to be unnecessary. When a proposal for consent is considered, it shall be evaluated according to the following criteria:*
  - a) *The undue extension of any major service is not required;*
  - b) *The land fronts on an existing public road which is of a reasonable standard of construction;*

- c) *Regard shall be had to the provisions of the Planning Act, and to the objectives, policies, and land use designation of the Official Plan;*
- d) *All parcels shall comply with the provisions of the Zoning By-law. Zoning compliance shall be a condition of the approval of all new lots created by consent.*
- e) *The size and shape of all parcels shall be appropriate for the intended use, and shall be generally compatible with adjacent lots;*
- f) *The proposed severance will not unduly contribute to traffic congestion or create a traffic hazard;*
- g) *The availability of water and sewage services to accommodate the proposed use; and*
- h) *Compliance with the environmental protection policies of this Plan. A suitable building envelope must be available on the severed and retained portions of the land to the satisfaction of the Town, County, applicable Conservation Authority and any other affected agency.”*

b) Summary of Relevant Erin OP Policies

- i. The Erin OP encourages limited expansion of hamlet areas where appropriate, including minor infilling and rounding out.
- ii. Hamlet expansions of more than 5 lots are not allowed. Reference is made that expansions must be based on a municipal comprehensive review but as earlier noted this requirement is superseded by a change in the Provincial Growth Plan as noted in Section 4.2 of this report.
- iii. The proposal consents conform to the requirements of Section 10 of the County OP as referenced in Section 4.4 of this report; and also meets the requirements of Section 5.15.2 of the Erin OP.

**4.5. Town of Erin Zoning Bylaw**

The Town of Erin’s Comprehensive Zoning Bylaw No. 07-67 was consolidated and adopted by Council on June 5, 2018. The smaller portion of the property is zoned OS1-107 and the remainder of the lands are zoned Agricultural (A) Zone. The OS1-107 is a specialized Open Space Zone which permits use for stormwater management purposes and related uses.

The proposed consents comply with the requirements of the A zone, which for lots of less than 10 ha require a minimum lot frontage of 30 m. and a minimum lot area of 0.4 ha. The proposed lots meet these requirements. It is further noted that the lands adjacent to and to the west of the subject property are also currently zoned Agricultural (A).

County of Wellington planning staff and Town of Erin planning staff have noted that a zoning amendment is required to change the zoning of the lands zoned OS1-107 to a

zone which permits single detached residential dwellings. That zoning amendment could zone the balance of the lands to a Rural Residential (R3) Zone which applies to some other residential lands within the Ospringle hamlet area. The proposed lots will comply with the requirements of the R3 zone.

## **5. Planning Considerations**

### **5.1. Land Use Compatibility**

The intended use of lands to which the Official Plan amendments applies is for the creation of three (3) lots for single detached residential use. The adjacent properties are all single detached residential lots, although those on the opposite side of WR 124 are larger rural residential lots.

The proposed lot sizes are generally consistent with adjacent residential lots within the hamlet, and the proposed lot pattern is also consistent with the lot fabric of the adjacent area.

### **5.2. Agricultural Impact**

There will be no significant impacts on agriculture if the proposed Official Plan amendments and consents are approved for the following reasons:

- i. the small 2.9 ha. size of the existing parcel of land is not a viable agricultural parcel;
- ii. the lands are primarily designated Secondary Agricultural which indicates they have lower capability for agricultural use;
- iii. the lands are surrounded by residential uses on all sides, limiting their flexibility for agricultural use;
- iv. there are no nearby larger agricultural uses which would be impacted by the creation of three (3) new residential lots in this location.

### **5.3. Environmental Impacts**

There are no environmental impacts if the proposed Official Plan amendments and consent applications are approved.

Based on Grand River Conservation Authority (GRCA) comments dated August 15, 2017, a portion of Consent Application B99-17 contain floodplain from a ditch off-site. GRCA noted that there is adequate room for development of this lot outside of the flood plain area, and further noted that development of this lot may require a permit from GRCA. GRCA concluded it had no objections to the proposed severances.



There are no other significant natural features on the subject property.

#### **5.4. Servicing**

There are no municipal or communal water or sanitary sewage systems available in the hamlet of Ospringle, and all development is serviced by individual wells and septic systems. An engineering brief is being submitted in support of these applications to demonstrate that suitable water and sanitary sewage services can be provided to the proposed lots.

#### **5.5. Access**

Access to the proposed residential lots will be from a local street known as Stewart Drive. The policies of Section 7.4.2 of the County OP require that road access be via internal roads where possible, rather than to a major road.

As a condition of severance approval the County of Wellington requires a 0.3 m. reserve along the frontage of the lots on WR 124 so that there is no future access can be provided from the new lots to that road.

#### **5.6. Noise Impacts**

Significant noise is not anticipated from WR 124. It is noted that the houses will face Stewart Drive and be well removed from WR 124. The owner has indicated he is prepared to provide a landscape/tree buffer along the property boundary of the severed lots with WR 124.

#### **5.7. Archeological Resources**

Consideration has been given to the likelihood of the site containing archaeological resources. If the site is evaluated against the Ministry of Tourism, Culture and Sport "Criteria for Evaluating Archaeological Potential" it does not meet the criteria for further assessment. The property is located approximately 450 m. from the Eramosa River, which exceeds the Ministry guideline separation distance of 300 m. It is also noted that a man-made drainage ditch located immediately adjacent to the property has resulted in previous disturbance of the site, and the site has been tilled in recent years resulting in further site disturbance.

Based on the foregoing, the site is not considered worthy of further archaeological assessment.

