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## Planning Justification Report – July 2026

### Minor Variance Application

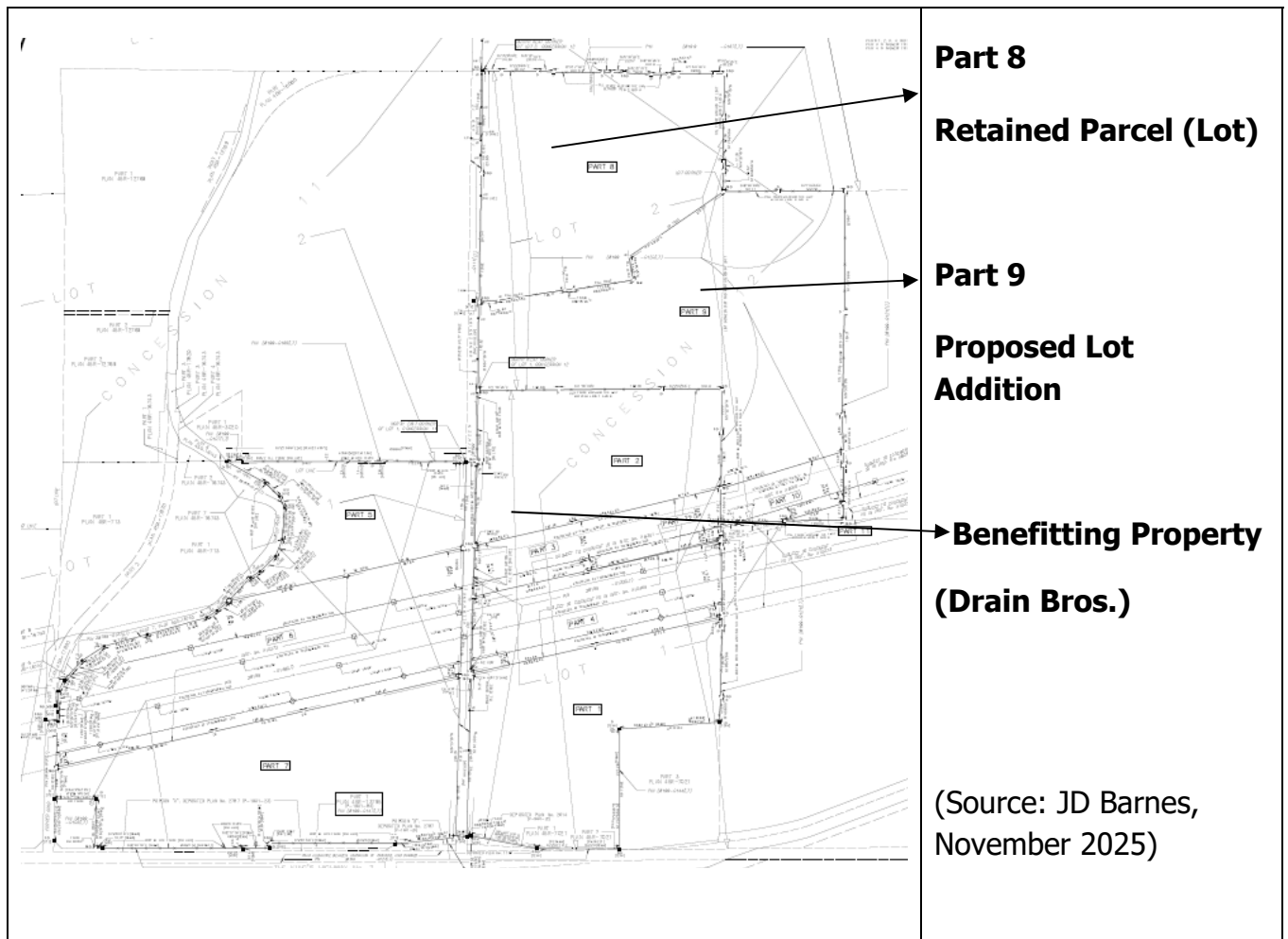
### 159 Twelfth Line Road Dummer (Dummer West)

### Township of Douro-Dummer, County of Peterborough

#### Introduction

This Planning Justification Report (PJR) has been prepared in support of a Minor Variance Application filed with the Township of Douro-Dummer Committee of Adjustment, regarding the property known municipally as 159 Twelfth Line Road Dummer, Township of Douro-Dummer.

#### The Property – Proposed Lot Addition Plan



The MV Application is required to address the area of the “retained” lot, post lot addition context. The retained parcel is sed for rural/agricultural purposes, including the existing dwelling and associated buildings. The Peterborough County Land Division Committee granted provisional Consent (Lot Addition) approval on June 25, 2026, File B-114-25. This Application is required to satisfy Approval Condition 4 of the PCLDC provisional approval.

## Analysis

### 2024 Provincial Planning Statement (2024 PPS)

The 2024 PPS came into full force and effect on October 21, 2024. Relative to the Minor Variance Application, the following policies of the 2024 PPS are considered to have direct relevancy:

| Policy | Title, Details and Planning Opinion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|        | <p>How to Read the Provincial Planning Statement</p> <p>The provincial policy-led planning system recognizes and addresses the complex inter-relationships among environmental, economic, health and social factors in land use planning. The Provincial Planning Statement supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas.</p> <p>The Provincial Planning Statement is more than a set of individual policies. It is to be read in its entirety and the relevant policies are to be applied to each situation. When more than one policy is relevant, a decision-maker should consider all of the relevant policies to understand how they work together. The language of each policy, including the Implementation and Interpretation policies, will assist decision-makers in understanding how the policies are to be implemented.</p> <p><b>Planning Opinion: I read the entire PPS as it would pertain to the Application.</b></p> |
| 2.3    | Settlement Areas and Settlement Area Boundary Expansion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2.3.1  | <p>General Policies for Settlement Areas</p> <p>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.</p> <p><b>Planning Opinion: The property is rural in nature, and does</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|     | <b>not form part of a designated settlement area.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2.5 | <p>Rural Areas in Municipalities</p> <p>1. Healthy, integrated and viable rural areas should be supported by:</p> <ul style="list-style-type: none"> <li>a) building upon rural character, and leveraging rural amenities and assets;</li> <li>d) using rural infrastructure and public service facilities efficiently;</li> <li>g) conserving biodiversity and considering the ecological benefits provided by nature; and</li> </ul> <p><b>Planning Opinion: The retained parcel is similar in size – configuration and land use as that of area properties.</b></p> <p>2. In rural areas, rural settlement areas shall be the focus of growth and development and their vitality and regeneration shall be promoted.</p> |
| 2.6 | <p>Rural Lands in Municipalities</p> <p>1. On rural lands located in municipalities, permitted uses are:</p> <ul style="list-style-type: none"> <li>b) resource-based recreational uses (including recreational dwellings not intended as permanent residences);</li> <li>c) residential development, including lot creation, where site conditions are suitable for the provision of appropriate sewage and water services;</li> </ul> <p>2. Development that can be sustained by rural service levels should be promoted.</p> <p><b>Planning Opinion: The Application serves to recognize the lot area of the property as a consequence of a Lot Addition Application (File B-114-25).</b></p>                            |

**It is my professional opinion that the Minor Variance Application is consistent with the policy directives of the 2024 Provincial Planning Statement.**

## County of Peterborough Official Plan (COP)

For purposes of this PJR, I employed the July 2022 version of the COP. It is acknowledged that the proposed “updated” County Official Plan is currently with the Province of Ontario, awaiting its final Provincial ratification

The property is currently designated “Rural” and “Extractive Industrial” by the Official Plan.

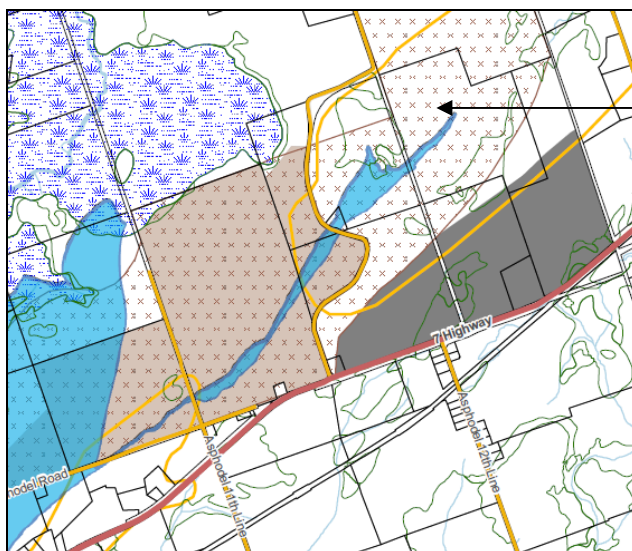
Relative to the Minor Variance Application, the following policies of the County Official Plan are considered to have direct relevancy:

| Policy  | Title, Details and Planning Opinion                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| 2.3     | <p>Local Official Plans</p> <p>It is the intent, and a requirement of the Planning Act that local official plans shall conform to this Plan and be one of the primary means of implementing the policies herein.</p> <p>In the event of a conflict between the provisions of a local official plan and the provisions of this Plan, the provisions of this Plan shall prevail to the extent of that conflict except where the local plan is more restrictive.</p>                                 |
| 2.4     | <p>Local Zoning By-laws</p> <p>When this Plan or any part thereof takes effect, every local zoning by-law shall be amended by the local municipalities to conform with this Plan pursuant to the Planning Act. The Amendments to the zoning by-laws should occur after the local Official Plan has been amended to conform to this Plan.</p> <p><b>Planning Opinion: The “retained” lot requires regulatory relief from the By-law to recognize the lot area, post lot addition scenario.</b></p> |
| 2.6.3   | Division of Land                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 2.6.3.1 | <p>General Policies</p> <p>The acceptability of Lot Additions in Peterborough County shall be determined by applying the relevant policies contained in this Plan, policies contained in local Official Plans, the 2005 Provincial Policy Statement, and the provisions of the Planning Act. Under no circumstances shall severances be recommended for approval where proposed severances are contrary to this Plan and/or the respective local Official Plan.</p>                               |

|         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| 2.6.3.5 | <p data-bbox="370 195 537 226"><b>Rural Areas</b></p> <p data-bbox="370 273 1406 464">Residential severances for land holdings located in the Rural Area should be discouraged in favour of development in Settlement Areas as identified on Map 'A' in an effort to promote orderly growth and development. However, severances in the rural area may be considered subject to the following:</p> <p data-bbox="370 504 1364 577">A) If the proposed lot(s) has been identified by the Health Unit and/or the Ministry of the Environment as a proposal where;</p> <p data-bbox="415 617 1382 693">i) municipal or communal services for water and/or sewer cannot be provided because of capacity problems or physical constraints; or</p> <p data-bbox="415 732 1433 961">in the absence of municipal or communal water and sewage services, it is determined by the Health Unit and/or the Ministry of the Environment that the area for sewage disposal on the proposed lots does not or cannot be made 2-16 Official Plan County of Peterborough to meet the requirements of current Health Unit or Ministry of the Environment policy;</p> <p data-bbox="370 1001 1362 1115">B) If it is determined by the local municipality, or the Ministry of the Environment that solid waste disposal cannot be provided, severances shall not be permitted.</p> <p data-bbox="370 1155 1406 1228">C) Lots shall have direct frontage on and access from publicly owned and maintained roads, unless otherwise permitted in local Official Plans.</p> <p data-bbox="370 1268 1356 1344">D) Applications which would create a traffic hazard because of limited sight lines on curves or grades shall not be granted.</p> <p data-bbox="370 1383 1271 1459">E) A severance from a farm operation may be granted if such is permitted in the local plan.</p> <p data-bbox="370 1499 1386 1612">F) Applications for severance may be granted when each of the severed and retained parcels is equivalent to a natural township lot (about 40 hectares).</p> <p data-bbox="370 1652 1425 1801">G) Consent applications shall comply with Minimum Distance Separation formula as established by the Province in order to minimize odour conflicts between livestock facilities and development, as amended from time to time.</p> |
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|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|     | <p>H) Consents in the Rural Area may be permitted in accordance with policies contained in local official plans provided the applicable policies of Sections 2.6.3.1, 2.6.3.5, 4.1.3 and 4.3 are complied with.</p> <p>I) Where local municipalities have specific Official Plan policies regarding scattered or strip development, the County will support local municipalities in their effort to control scattered or strip development and support development that is appropriate for the infrastructure which is planned or available and avoid the need for unjustified or uneconomical expansion of this infrastructure.</p> |
| 4.3 | <p><b>Rural and Cultural Landscape</b></p> <p>The rural and cultural landscape represents all land areas outside of an identified settlement area, that are not:</p> <ul style="list-style-type: none"> <li>• shoreland areas as described in Section 4.4;</li> <li>• significant natural heritage features or other natural resources listed in Section 4.1;</li> <li>• utilized for transportation purposes, physical services and utilities;</li> <li>• used for recreation and open space purposes.</li> </ul>                                                                                                                   |

### Official Plan Map Schedule – Detail



The Property

(Source: County of Peterborough GIS Website, July 2026)

**In summary, it is my professional opinion that the Minor Variance Application is in keeping with the policy directives of the County Official Plan, including the local tier component.**

### **Township of Douro-Dummer Zoning By-law**

The property is zoned RU - Rural in the Township of Douro-Dummer's Comprehensive Zoning By-law (2010-65).

### **Lot Area Summary (From JD Barnes plan, November 2025)**

| SCHEDULE |               |            |                    |               |
|----------|---------------|------------|--------------------|---------------|
| PART     | LOT           | CONCESSION | PIN                | AREA          |
| 1        | PART OF LOT 1 | 12         | PART OF 28199-0122 | 129 770 sq m. |
| 2        |               |            |                    | 105 589 sq m. |
| 3        |               |            |                    | 42 568 sq m.  |
| 4        |               |            |                    | 64 384 sq m.  |
| 5        | PART OF LOT 1 | 11         | ALL OF 28199-0148  | 72 950 sq m.  |
| 6        |               |            |                    | 164 202 sq m. |
| 7        |               |            |                    | 161 853 sq m. |
| 8        | PART OF LOT 2 | 12         | ALL OF 28199-0120  | 158 719 sq m. |
| 9        |               |            |                    | 216 848 sq m. |
| 10       |               |            |                    | 19 611 sq m.  |
| 11       |               |            |                    | 1 698 sq m.   |
| 12       | PART OF LOT 1 | 12         | PART OF 28199-0122 | 393 sq m.     |

The retained parcel, subject of this Minor Variance Application has a lot area of 15.87 hectares. The RU-Rural zone requires a minimum lot area of 20 hectares. The Minor Variance Application seeks the following relief:

To reduce the minimum required lot area of 20 hectares to 15.87 hectares (Regulation 9.2.1 a)).

Section 45 (1) of the Planning Act sets forth four (4) tests that are to be addressed when evaluating a Minor Variance Application.

#### **1. Is the Variance Minor in Nature?**

The Minor Variance Application is required to recognize the reduced lot area as a consequence of the recent Consent (Lot Addition) Approval, granted by the Peterborough

County Land Division Committee. The reduced lot area is minor in nature. There is no change in land use and no development arising from the approval.

**It is my Professional Planning Opinion that the Minor Variance is Minor in nature.**

**2. Is the Variance desirable and appropriate for the use of land?**

The Minor Variance Application is required to permit a reduction in lot area as per test 1. The property will continue to be used for rural/agricultural purposes.

**It is my Professional Planning Opinion that the Minor Variance is appropriate and desirable for the use of the property.**

**3. Do the Variances maintain the general intent and purpose of the Zoning By-law?**

The Minor Variance Application is required to permit a reduction in lot area only. The property otherwise meets all regulatory provisions of the Zoning By-law RU-Rural Zone, Section 9 of the Zoning By-law).

**It is my Professional Planning Opinion that the Minor Variance maintains the general intent and purpose of the Zoning By-law (Douro-Dummer Township).**

**4. Do the Variances maintain the general intent and purpose of the Official Plan?**

The continued use of the property for rural/agricultural purposes is in conformity with the 2022 County Official Plan, including the Lower Tier land use policies of same.

**It is my Professional Planning Opinion that the Minor Variance maintains the general intent and purpose of the County Official Plan.**

## **Summary**

**It is my Professional Planning Opinion that the Application satisfied the 4 (four) tests prescribed in Section 45(1) of the Planning Act, and furthermore the Application is:**

- Consistent with policy directives of the 2024 Provincial Planning Statement;
- In Keeping with the general purpose and intent of the land use designations and policies of both the July 2022 County of Peterborough Official Plan;

- In Keeping with the general purpose and intent of the policies/land use designations of the July 2022 update of the County Official Plan;
- In Keeping with the general purpose and intent of the regulatory provisions of the Township of Douro-Dummer Zoning By-law, including By-law; and
- **Representative of Good Planning.**

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'K. M. Duguay', with a stylized flourish at the end.

Kevin M. Duguay, MCIP, RPP