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**Planning Justification Report –
Zoning By-law Amendment Application
133 Moon Line Road, Municipality of Trent Lakes**



September 24, 2025

**Prepared by Kevin M. Duguay, MCIP, RPP
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Planning Justification Report - Zoning By-law Amendment (ZBLA) Application 133 Moon Line Road, Municipality of Trent Lakes

Introduction

This Planning Justification Report has been prepared in support of a ZBLA Application filed with the Municipality of Trent Lakes, regarding the rural property known municipally as 133 Moon Line. The Application is required to permit two (2) proposed lots intended for rural residential purposes.

The Property



The Property

(Source: County of Peterborough GIS Website, September 2025)

The Consent (Severance) Applications

The Consent (Severance) Applications were granted Provisional Consent Approval by the County Land Division Committee on November 26, 2024 (Files B82-24 and B83-24, respectively).

County Preliminary Severance Review (PSR)

A Preliminary Severance Report was issued by the County Planning Department on March 1, 2023. The Report identified that for two (2) studies were in support of the

Applications. Additionally, the Report at the time that the proposed lot configuration would warrant modification. as portions of the property are designated as "Extractive Industrial". This requirement was addressed and is reflected in the proposed severed lot location configuration.

Background Reports

The two (2) Background Reports prepared in support of the Consent (Severance) Applications, are summarized as follows:

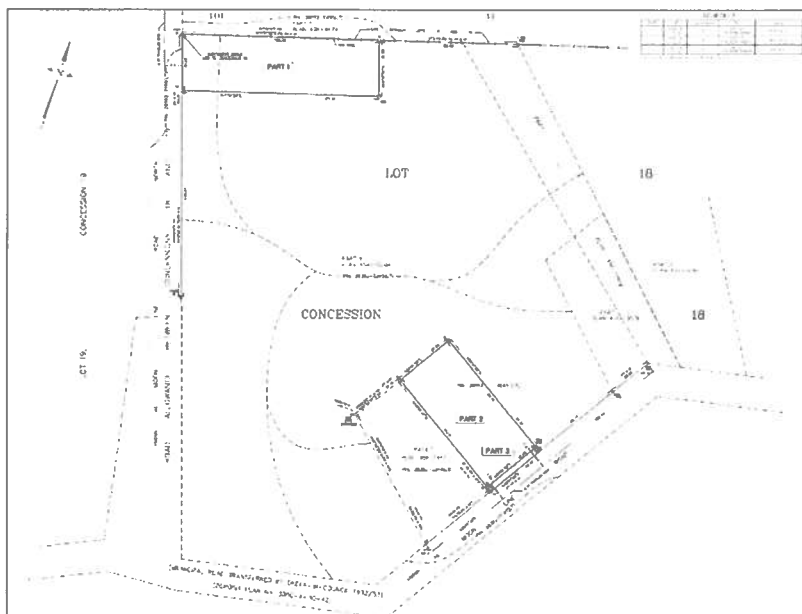
1. Natural Heritage Study (NHS), SUMAC Environmental, July 2024; and
2. Aggregate Assessment, ORE, Oakridge Environmental Ltd., May 2024.

These reports are included as part of the Application process, and are provided in e-format (PDF) for purposes of the ZBLA Application. The proposed lot locations are supported by the findings/recommendations of the two background reports.

Proposed Severed Lots – Location

Two (2) 0.4 hectare (1 acre) lot are proposed. Driveway access will be confirmed through the Township Public Works Department, as part of the building permit approval process.

Registered Plan



(Source: JBF Surveyors,
June 5, 2025)

Analysis

2024 Provincial Planning Statement (2024 PPS)

Since the March 2023 County PSR, the Province of Ontario has introduced the 2024 Provincial Planning Statement (2024 PPS) which had the effect of replacing two (2) previous governing Provincial Planning documents; being the 2020 Provincial Policy Statement and the 2020 A Place to Grow, Growth Plan for the Greater Golden Horseshoe.

Accordingly, this PJR speaks to the 2024 PPS document.

Policy	Details, Planning Opinion
2.5	<p>Rural Areas in Municipalities</p> <p>1. Health, integrated and viable <i>rural areas</i> should be supported by:</p> <p>d) using rural <i>infrastructure</i> and <i>public service facilities</i> efficiently;</p> <p>g) conserving biodiversity and considering the ecological benefits provided by nature;</p> <p>Opinion: Two property severances serving to create two (2) lots intended for rural residential purposes are proposed. The proposed lots will make efficient use of available rural infrastructure and public service facilities. The ZBLA Application will facilitate the proposed lot creations.</p>
2.6	<p>Rural Lands in Municipalities</p> <p>1. On rural lands located in municipalities, permitted uses are:</p> <p>c) residential development, including lot creation, where site conditions are suitable for the provision of appropriate <i>sewage and water services</i>;</p> <p>Opinion: The ZBLA Application is required to satisfy a condition of the November 2024 PCLDC Provisional Consent approval, which will permit two (2) lots intended for rural residential purposes, which is a form of limited residential land use.</p>

	<p>d) Development that can be sustained by rural service levels should be promoted.</p> <p>Opinion: The property already benefits from current Municipal (and related) services.</p>
3.6	<p>Sewage, Water and Stormwater</p> <p>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.</p> <p>Opinion: The proposed severed lots will rely upon private water and waste-water services. New, individual septic facilities will be required to accommodate the single-unit dwelling per lot.</p>
4.1	<p>Natural Heritage</p> <p>1. Natural features and areas shall be protected for the long term.</p> <p>Opinion: The NHS Report addressed Natural Heritage matters and confirms that the proposed lot creations will not have an impact upon Natural features.</p>

In summary, it is my professional planning opinion that the ZBLA Application is consistent with the policy directives of the 2024 Provincial Planning Statement.

County of Peterborough Official Plan (July 2022 Version)

The property is designated by the County Official Plan as follows:

Portion of Property	Current Designation
Severed Lots	Rural
Retained	Rural

For purposes of this Report, I utilized the July 2022 version of the County of Peterborough Official Plan, acknowledging that the proposed 2024 Plan is awaiting final Ministerial approval.

Policy	Details, Planning Opinion
2.3	<p>Zoning By-Laws</p> <p>This Plan shall be implemented by local Municipal Comprehensive Zoning By-Laws adopted under Section 34 of the Planning Act. The implementing Zoning By-Laws shall conform with and give effect to the provisions of this Plan.</p> <p>Notwithstanding the above, this Plan is not intended to prevent the continuation, expansion, or enlargement of uses which do not conform to the designations and provisions of this Plan. At their sole discretion, local Municipalities may zone to permit the continuation, expansion or enlargement of legally existing uses, or variations to similar uses, provided that such uses:</p> <ul style="list-style-type: none"> • have no adverse effect on present uses of surrounding. <p>Each case will be considered on its own merits by the respective local Municipality and may be subject to site plan control.</p> <p>Opinion: The proposed retained lot meets the current zoning of the property. The proposed severed lots required rezoning approval.</p>
4.1.3	<p>Rural</p> <p>The Rural land use designation generally applies to lands located outside settlement areas and rural settlements, waterfront areas and prime agricultural areas. Rural lands are intended to protect the natural amenities and rural character of the community while providing opportunities for agricultural uses, resource-based activities, recreation, tourism and other rural land uses.</p> <p>Opinion: The property is designated as "Rural" by the COP (July 2022).</p>

4.1.3.1	<p>Permitted Uses</p> <p>Permitted uses in the Rural designation shall include agricultural uses, agriculture related uses and on-farm diversified uses, as well as low-intensity recreation uses, conservation and forestry uses, schools, cemeteries, commercial kennels, small scale commercial and industrial uses and wayside pits. Low density residential development, group homes, home occupations, home industries, bed and breakfast establishments and mineral aggregate operations are also permitted.</p> <p>Opinion: The ZBLA Application serves to permit two (2) proposed rural residential lots which is a form of "low density residential development."</p>
4.1.3.2	<p>New Development</p> <p>a) Lot creation in the Rural designation is limited and may only be permitted in accordance with Section 3.5 of this Plan. Applications for plans of subdivision or condominium shall not be permitted.</p> <p>Opinion: The proposed severed lots (lot creation) satisfy the policy directives of section 3.5 of the COP (July 2022)</p> <p>d) All private water supply and sewage disposal systems shall satisfy the requirements of Peterborough Public Health, the applicable approval agency, or the Province.</p> <p>e) In accordance with the policies of this Plan and where deemed necessary by the local Municipality, the applicant may be required to demonstrate a sufficient potable water supply.</p> <p>f) New land uses, including the creation of lots and new or expanding livestock facilities, shall comply with the minimum distance separation formula as outlined in Section 3.8 of this Plan and as established by the Province, and in accordance with local Zoning By-Laws.</p>
3.5	<p>Consents</p> <p>The policies in this section are to be used in the evaluation of lot creation by consent. However, policies from throughout the Plan including those of the applicable land use designation may contain</p>

	<p>additional policies governing lot creation.</p> <p>While the County does not have mandatory pre-consultation for consent applications, applicants are strongly encouraged to have proposals reviewed using the County's Preliminary Severance Review service. The Preliminary Severance Review serves as a pre-consultation tool and intends to advise the applicant of any concerns or supporting materials that may be necessary in the processing of a formal application.</p> <p>Opinion: The Consent (Severance) Applications were considered as part of the Preliminary Severance Review process, including a Municipal Appraisal Form response.</p> <p>1) Where a plan of subdivision is not necessary for proper and orderly development, an application for consent may be considered. Unless stated otherwise, a maximum of two consents for a new lot may be permitted from a landholding.</p> <p>A land holding is defined as being a legal parcel of land as it existed:</p> <ul style="list-style-type: none"> • In Douro-Dummer, 25 years prior to the date of application. <p>In addition, for residential consents in Douro-Dummer, the applicant must have owned the property for a minimum of 5 years prior to the date of application.</p> <p>Opinion: The two (2) proposed lots have been granted PCLDC Provisional Consent Approval (November, 2024).</p>
	<p>5) General Policies Applicable to all Applications</p> <p>In assessing the suitability of an application for consent, all severances shall have regard for the following criteria:</p> <p>a) Unless stated otherwise, a consent shall only be granted where both the severed and retained lots front onto and have direct access from a public road.</p> <p>The creation of lots fronting on and having direct access to a Provincial Highway or County Road is discouraged where an alternative access is available from a local Municipal road. The County and/or local Municipality may request a report from the appropriate road authority,</p>

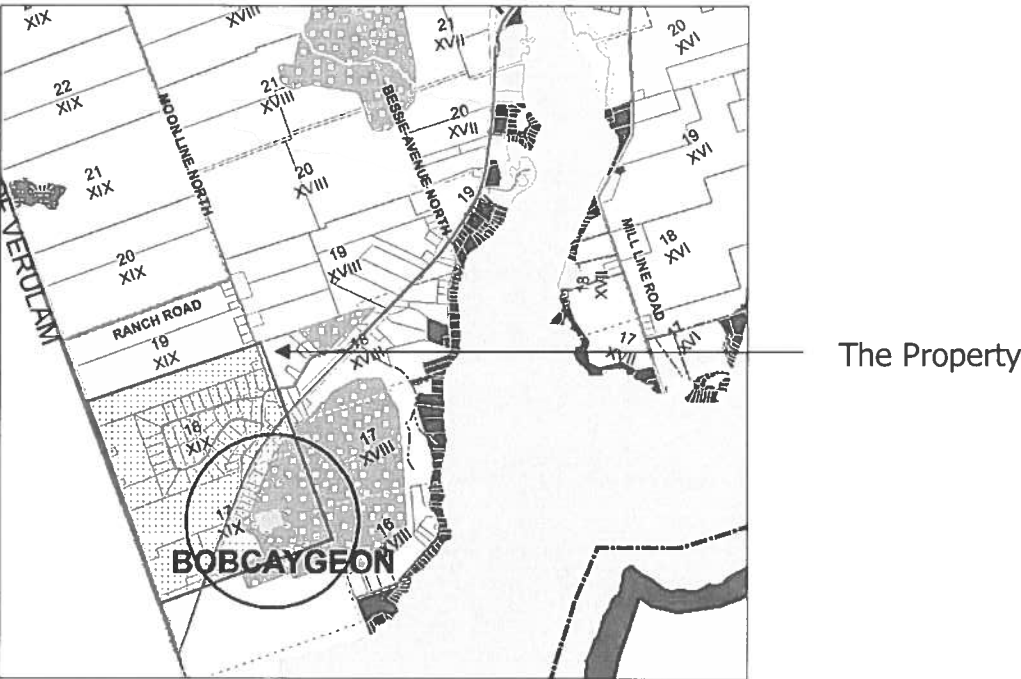
	<p>and a consent shall not be granted where it does not comply with the policies of the applicable road authority.</p> <p>c) All consent applications, where applicable, must meet the requirements of Peterborough Public Health or the authority having jurisdiction for on-site sewage disposal.</p> <p>d) All new lots must meet the requirements of the Minimum Distance Separation formulae as established by the Province and outlined in Section 3.8.</p> <p>e) Lots shall be of a suitable size and shape for the proposed use. Wherever possible, new lots must abut an existing lot line and are strongly recommended to avoid irregular shapes (e.g. flag or 'L' shaped lots), taking into consideration the configuration of the existing parcel fabric.</p> <p>i) All consents shall conform to the appropriate regulations for uses established in the implementing Zoning By-Law. A rezoning or minor variance may be required as a condition of consent.</p> <p>Opinion: The proposed two (2) severed lots conform with the policy provisions of Section 3.5.5, particularly sub-sections (a), (c), (d), (e) and (i), respectively.</p>
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It is my professional planning opinion that the ZBLA Application is in keeping with the land use designation and policies of the County Official Plan (July 2022).

Municipality of Trent Lakes Official Plan (MOP)

The property is designated as "Rural" by the MOP.

Official Plan Map Detail



(Source: Municipality of Trent Lakes Website, September 2025)

Policy	Details, Planning Opinion
4.1	<p>Residential Development</p> <p>Goal</p> <p>To direct the location and type of future residential development within the Township.</p> <p>Objectives</p> <p>i) To direct residential development to the existing areas of residential development and the Township's hamlets.</p> <p>Opinion: The property is located in area of established residential land uses.</p>
5.2	Rural

	<p>The "Rural" designation covers a substantial portion of the lands within the Township of Galway-Cavendish and Harvey. The main purpose of this designation is to protect these lands against indiscriminate and haphazard development and protect the lands for those uses which have historically been associated with them.</p>
5.2.1	<p>Permitted Uses</p> <p>Permitted uses shall include forestry management uses, passive recreational uses, parklands, small scale commercial and industrial uses at the home of the proprietor, agricultural uses, community and institutional facilities such as places of worship, government offices and schools, wayside or short-form pits and quarries, limited permanent and recreational residential dwellings at a very low density, and existing uses.</p>
5.2.2	<p>Residential Development in the Rural Designation</p> <p>The intent of this Plan is to prevent urban development on lands designated as Rural particularly on lands suitable for forestry and specialized forms of agriculture. Residential development should be encouraged to locate in the residential areas as designated on Schedules "A1", "A2", and "A3". In general, consents for residential purposes in the Rural area shall be discouraged and development shall be encouraged by plan of subdivision. However residential severances may be granted in accordance with the policies of Section 6.0 of this Plan.</p> <p>Opinion: The property is surrounded by several established residential properties land uses.</p>
6.0	The Division of Land
6.2	<p>Severances</p> <p>Regard shall be had for Section 6.1 Subdivisions when determining the necessity for a plan of subdivision.</p> <p>It shall be the policy of this Plan that the Municipality and Land Division Committee shall follow the policies of this Official Plan when</p>

	<p>assessing consent to sever applications.</p> <p>Only those applications for severances which conform to the following consent policies, the General Development Policies, the specific policies of the affected designation and the provisions of the Planning Act, R.S.O. 1990, shall be considered for approval.</p>
6.2.1	General Severance Policies Applicable to All Designations
6.2.1.1	<p>Number of Lots</p> <p>In the Rural, Recreational Dwelling Area, Estate Residential, Commercial and Industrial designations, the maximum number of lots that may be created by consent per land holding shall be two (2) severed lots and one (1) retained lot.</p> <p>Opinion: The ZBLA Application seeks to permit two (2) proposed lots intended for rural residential purposes, pursuant to Policy 6.2.1.1</p>
6.2.1.2	<p>Compatibility</p> <p>Regard shall be had for ensuring satisfactory compatibility between the proposed land use and existing land uses.</p> <p>Opinion: The proposed lots are considered compatible with established area residential properties.</p>
6.2.1.3	<p>Lot Sizes</p> <p>The size of any new lot created by consent should be appropriate for the use proposed and the services available. Consents will only be granted in areas where the undue extension of any major services would not be required.</p> <p>Opinion: Both proposed severed lots will have an area of 0.4 hectares.</p>
6.2.1.4	Access
6.2.1.4.1	<p>General Policy for Rural Access</p> <p>Severances that create new lots shall only be considered when both</p>

	<p>the newly created lot and the retained lot front on an assumed public road that is currently maintained on a year-round basis by a public authority.</p> <p>Opinion: Both proposed severed lots will have frontage on a year-round maintained public road.</p>
6.2.1.5	<p>Zoning By-law Conformity</p> <p>The parcel of land to be created by severance and the retained parcel and proposed use shall conform to all applicable provisions of the Township's Zoning By-law, save that the consent to sever may be granted on the condition that a Zoning By-law amendment or minor variance be approved, if required.</p> <p>Opinion: The two (2) proposed severed lots require rezoning approval.</p>
6.2.1.6	<p>Water Supply, Sewage Disposal and Drainage</p> <p>Severances may only be considered when it has been established by the Ministry of Environment or its agent that soil and drainage conditions are suitable to permit the proper siting of buildings, to obtain sufficient potable water and to permit the installation of an adequate means of sewage disposal for both the severed and retained parcels.</p> <p>Opinion: The two (2) proposed severed lots will rely upon private water and waste-water facilities.</p>
6.2.1.7	<p>Orderly and Controlled Development</p> <p>In general, residential severances shall be encouraged as infilling in or adjacent to those areas designated Hamlet or clusters of houses in the Rural Area, in an effort to promote orderly and controlled development throughout the municipality.</p> <p>Opinion: The two (2) proposed severed lots are adjacent to several established residential properties.</p>

It is my professional planning opinion that the ZBLA Application is in keeping with the general purpose and intent of the policies and land use designations of the Municipality of Trent Lakes Official Plan.

Municipality of Trent Lakes Zoning By-law

The property is zoned RU – Rural.

Map Schedule Detail



(Source: County of Peterborough GIS Website, September 2025)

The two (2) proposed severed lots require rezoning approval. The ZBLA Application seeks to rezone the lots to RR – Rural Residential. The retained parcel will remain zoned as RU – Rural.

It is my professional planning opinion that the ZBLA Application is in keeping with the general purpose and intent of the regulatory provisions of the Municipality of Trent Lakes Zoning By-law.

Summary

It is my professional planning opinion that the ZBLA Application is:

- Consistent with policy directives of the 2024 PPS;
- In Keeping with the general purpose and intent of the policy provisions/directives of both the July 2022 County of Peterborough Official Plan and the Municipality of Trent Lakes Official Plan;
- In keeping with the general purpose and intent of the regulatory provisions of the Municipality of Trent Lakes Zoning By-law; and
- **Representative of Good Planning.**

Respectfully submitted,



Kevin M. Duguay, MCIP, RPP