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City of Kingston
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Date: October 24, 2019

**Re: Minimum Distance Separation I Type B Land Use Reduction
Review of Submitted Planning Rationale and MDS Study
2285 Battersea Road, Kingston
D35-003-2019**

Introduction

The Provincial Policy Statement and the City's Official Plan contain policies that require land use planning applications for new development to review the area surrounding an application for livestock facilities (barns) and manure storage facilities. Existing and proposed barns and manure storage facilities generate a setback called minimum distance separation (MDS), which is a provincial tool created to reduce land use conflicts and minimize nuisance complaints from odour between non-farming uses and barns.

Section 1.1.5.9 of the Provincial Policy Statement states that new land uses, and new or expanding livestock facilities (barns), shall comply with the minimum distance separation (MDS) formulae. The Ontario Ministry of Agriculture, Food, and Rural Affairs (OMAFRA) Publication 853 (MDS Guidelines) represents the MDS as defined in the PPS. Land use planning matters are required to be consistent with the PPS, including municipal official plans and zoning by-laws.

Accordingly, the City Of Kingston's Official Plan, Section (2.5.7c, 2.7.8.) outlines the physical separation of livestock facilities and sensitive land uses as the primary form of mitigating land use conflict and protecting normal farming practices. One of the criteria for siting the location of new Rural Commercial land uses is that, wherever possible, they be on the least productive agricultural lands and on sites that will not hinder agricultural operations (3.14.8.a). Agricultural uses are defined in the Official Plan as including the raising of livestock.

The implementation of MDS is the responsibility of municipalities through the review of Planning Act applications and building permits. This memo will review the application of the MDS Guidelines for an Official Plan Amendment and Zoning By-law Amendment (Municipal File D35-003-2019) at 2285 Battersea Road. This application proposes to reduce the MDS I setback from an adjacent barn to facilitate the development of a tourist commercial use.

History of MDS

Provincial and Municipal policies require that new land uses comply with the MDS to ensure that proposed developments have minimum impact on, do not interfere with, and are compatible with the surrounding agricultural and rural land uses.

The MDS Guidelines is the provincial handbook on how to apply the MDS formulae. The Guidelines provide direction on how to calculate, apply, and interpret the MDS formulae.

Section 2.1 of the MDS Guidelines outline that permitting development which is incompatible with livestock facilities can have a detrimental impact on the ability of surrounding agricultural operations to expand. New development in the rural areas introduces potential new sources for nuisance complaints regarding odour from livestock facilities, which has impacts on maintaining and continuing existing livestock operations.

MDS setbacks allow new land uses to be sited in the rural areas at a distance that reduces land use conflict due to odour complaints. These separation distances also allow livestock facilities room to expand in the future by keeping areas around barns free from non-compatible developments.

Provincial direction for separation between barns and non-agricultural uses began in 1970 with the introduction of a publication entitled “A Suggested Code of Practice.” While it contained a framework for separating new and expanding barns from existing non-agricultural uses, it provided little protection to the barns from encroachment by other land uses.

In 1976, the Agricultural code of Practice was published to establish a two-way approach to separating barns from non-compatible uses and vice-versa. Minimum Distance Separation I (MDS I) formulae was established to determine setbacks between proposed new development and existing livestock facilities. The Minimum Distance Separation II (MDS II) formulae was established to determine setbacks between proposed new, enlarged, or renovated livestock facilities and other existing or approved development. While the calculation of the separation distances has been updated over the years, the general purpose has remained the same.

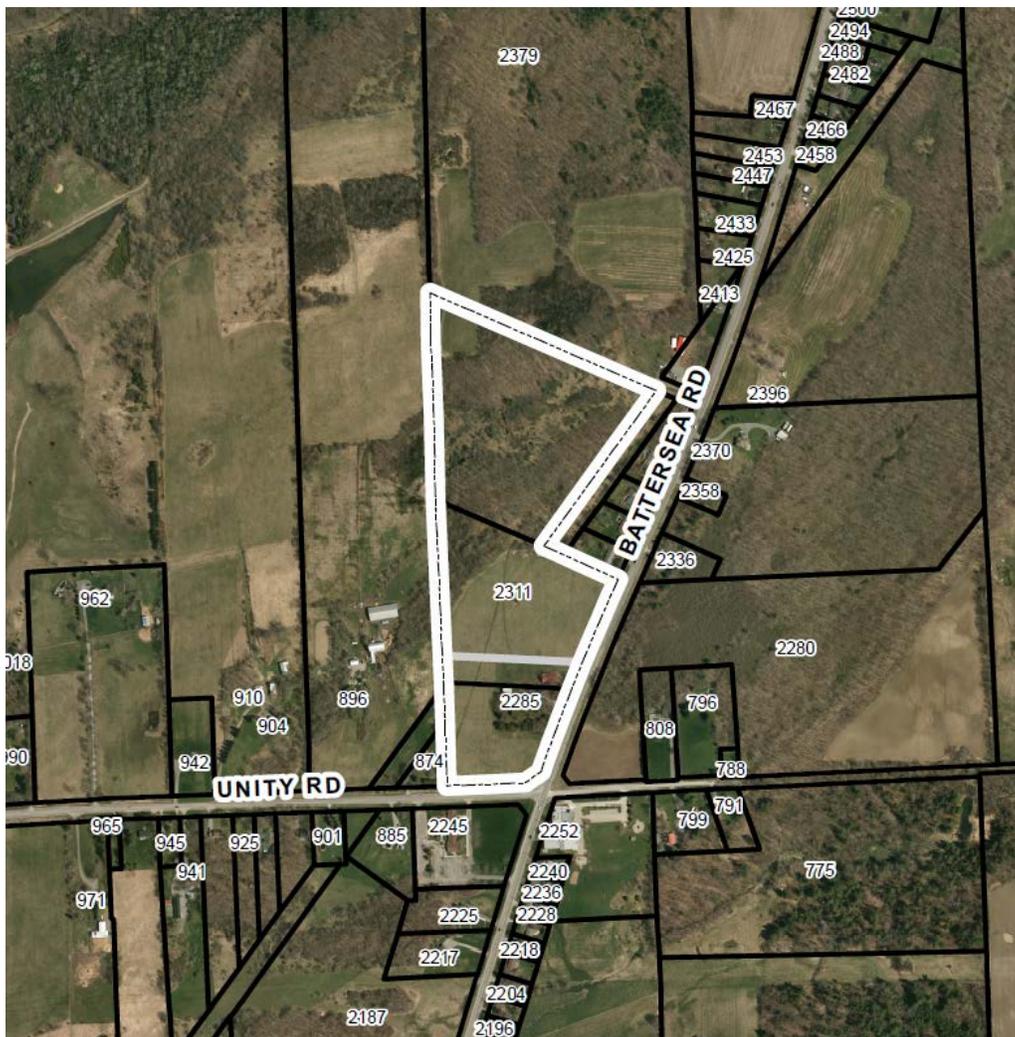
As per Section 2.3 of the MDS Guidelines, MDS setbacks are an important and effective tool for dealing with nuisance issues related to odour. However, they will not eliminate all potential odour complaints, nor will they address other nuisance issues such as noise, dust, light, smoke, vibration, or flies as listed under the Farming and Food Production Protection Act, 1998. The proper application of MDS may incidentally reduce potential conflicts associated with these nuisances.

Application

The subject lands are located at 2285 Battersea Road, 2311 Battersea Road, and a landlocked parcel located north of 2311 Battersea Road. The subject lands have frontage onto Unity Road and Battersea Road.

Unlike urban areas, there are no pre-designated lands within the countryside for commercial activities and any proposal for new large scale commercial uses require an application to re-designate lands Rural Commercial.

Application D35-003-2019 for an official plan amendment and zoning by-law amendment proposes to re-designate the subject lands from Rural to Rural Commercial, and rezone the lands from an Agricultural A1 and A2 to a site specific Highway Commercial (C3-X) Zone to facilitate the development of a spa and inn with 27 suites, restaurant, 40 individual cabins, a craft brewery/cidery, craft winery, events facility, and retail outlet for the sale of local produce and small gift shop related items. A vineyard and fruit trees will also be planted on site.



When considering land uses in the rural areas, it is important to understand whether a proposed use is a Type A land use (single detached dwelling) or a Type B land use (commercial uses, expanded settlement area, etc.).

In accordance with the MDS Guidelines, the Planning Rationale has classified the proposed tourist accommodation facility as a Type B Land Use (Guideline 34) due to the higher degree of human habitation.

- Guideline 34 – For the purposes of MDS I, proposed Type B land uses are characterized by a higher degree of human occupancy, habitation, or activity, including but not limited to an official plan amendment and/or zoning by-law amendment to permit development, excluding industrial uses, on land outside a settlement area.

Due to the increased sensitivity of these land uses, Type B land uses will generate a setback that is twice the distance as the MDS I setback for a Type A land use.

The subject lands are impacted by both the Type A land use setback and the Type B land use setback generated from the existing horse barn located at 896 Unity Road (Image 1 – MDS Setbacks). This barn contains horses, chickens, and goats. The image shows that the proposed spa, inn, event centre, and several cabins are entirely within the MDS I Type B land use setback. The applicants have applied to reduce the MDS setback to facilitate the development in the location as shown.

Image 1 – Calculated MDS Setbacks

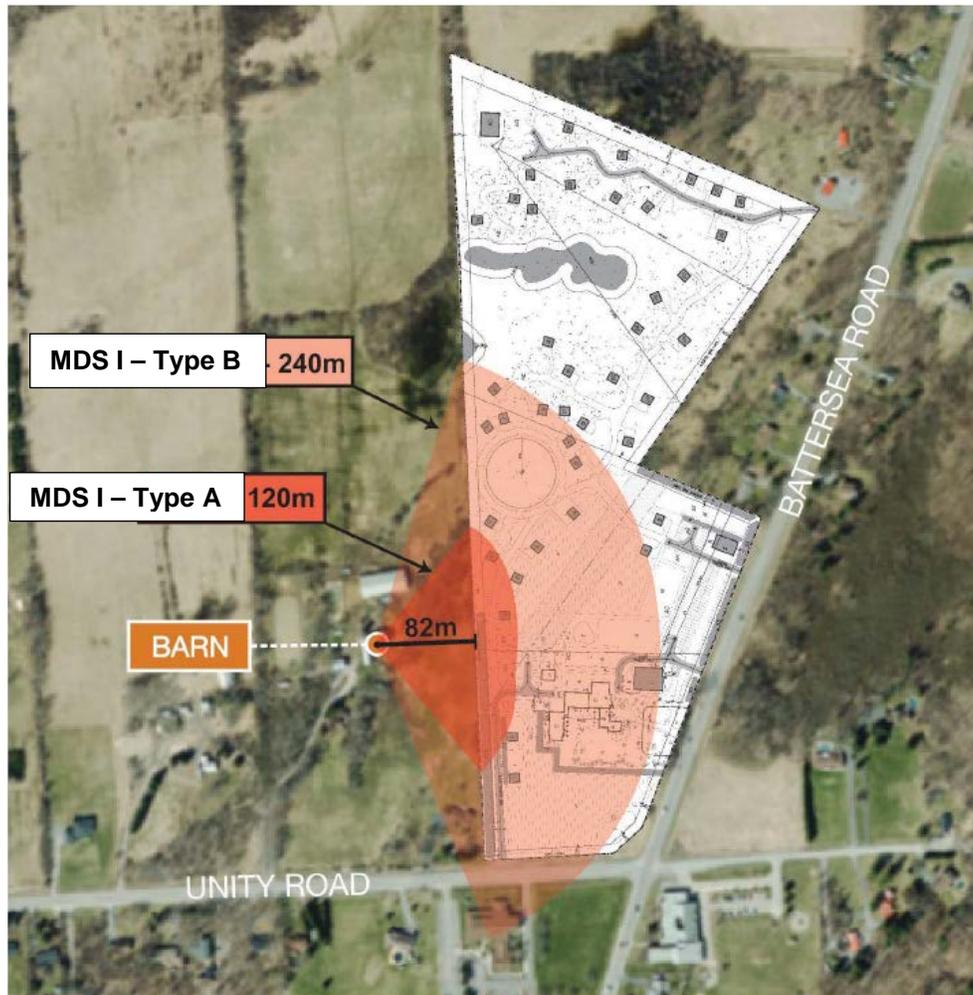


Figure 23: MDS requirements and proposed reduction (source: Fotenn).

The applicants submitted two documents to support the MDS I Type B land use reduction: an MDS Study dated March 1, 2019; and, a Planning Rationale dated April 9, 2019. Both documents were prepared by Fotenn Planning Consultants Inc. The Study and Rationale propose a reduction to the MDS I Type B setback for a livestock facility located at 896 Unity Road from 240 metres to 82 metres. The reduction to 82 metres is the distance between the existing barn at 896 Unity Road and the property line shared with 2285 Battersea Road (subject property) as shown in Image 1. The proposed reduced setback for Type B land uses is less than the Type A land use setback of 120 metres.

The application as submitted also contained a request to reduce the MDS II setback for the barn at 896 Unity Road. From the Rationale, the request to vary the MDS II setback for a potential future expansion of the barn at 896 Unity Road was included with the application to reduce future limitations on an expansion to the barn.

It is important to note that in accordance with Guideline 2, an application must reflect the circumstance at the time of application. This application therefore cannot take into account a hypothetical potential future expansion of the adjacent barn.

The second request is outside of the scope of the application, which can only apply to the subject lands at 2285 Battersea Road. The review of the application will only consider the request to vary the existing MDS I Setback and classification of the proposed land uses as either Type A or Type B, consistent with MDS Guidelines 33 and 34.

Review of Justification

When introducing new land uses into the Rural Lands, the proposed uses, including the creation of lots, and new or expanding livestock facilities, must comply with the minimum distance separation formulae (PPS Section 1.1.5.9). The objective of the MDS Guidelines is to minimize nuisance complaints due to odour and thereby reduce potential land use conflicts and ensure compatibility with surrounding agricultural uses.

The MDS Guidelines are the primary tool for implementation of MDS in the PPS, and any reference to MDS in the PPS should be taken as referencing the MDS Guidelines. Municipal decisions “shall” be consistent with the PPS. Therefore the planning recommendation must reflect this requirement. The City’s Official Plan contains policies to provide further insight into how the City implements the MDS Guidelines.

The Planning Rationale cites several of the MDS Guidelines to support their proposed reduction. These have been reviewed and responses provided for each.

Guideline 6 and 12

The requirement to meet MDS I is something that should be assessed at the time when considering finding alternative sites to locate development. MDS I setbacks are required to be measured from all existing barns on lots surrounding a development application that are reasonably expected to impact the proposed application (MDS Guideline 6). The MDS Guidelines outline that all barns within 1500 metres of an application for a new or expanding Type B land use shall be investigated and calculations undertaken where warranted.

The barns within the 1500 metre review area are comprised of a mix of horses, beef cattle, dairy cattle, and one vacant barn. The vast majority of livestock facilities within the review area are horse barns. Horses are considered livestock in the MDS Guidelines and therefore horse barns and their manure storage facilities generate an MDS setback.

The supporting documents outlined that there are 13 barns within the 1500 metre review area. The MDS Study included addresses for the barns and a map with an identified MDS Setback.

Calculations were only provided by the applicant for 2 of the 13 barns due to their interpretation and application of MDS Guideline 12. MDS Guideline 12 allows for a reduction in MDS setbacks where there are four or more intervening non-agricultural uses between a proposed development and a barn. These intervening land uses must meet all of the following criteria:

1. They are located within the intervening area (120 degree field of view) between the closest part of the proposed development and the nearest part of the barn;
2. Located on separate lots; and
3. Of the same or greater sensitivity (Type A land use or Type B land use).

For the proposed commercial development, that means there needs to be four or more Type B land uses between each barn within the 1500 metre review area (within a 120 degree field of view), located on separate lots, for a reduced setback to be granted.

Existing Type B land uses as characterized by Guideline 34 include settlement areas and existing development outside of a settlement area which is recognized through an official plan designation.

Mapping was provided demonstrating where MDS setbacks were reduced due to four or more intervening land uses in accordance with the application of Guideline 12 (Exhibit A). No additional supporting evidence is contained within in the MDS Study or Planning Rationale to describe how the lands between the barns and the proposed development meet the criteria to be considered a Type B land use.

Planning Staff have reviewed land uses between the barns and the subject lands and concluded that there are not four or more intervening Type B land uses to support a reduction under Guideline 12 and the MDS Guidelines.

Planning Staff conducted a review of the barns through aerial mapping and site visits to each of the properties and found that there are 14 barns within the 1500 metre review area. A calculation for each of the barns is attached as Exhibit A. The table below summarizes the information.

Table 1 – MDS Calculations Summary Chart

Barn	Municipal Address	Livestock	Calculated MDS Setback	Actual Distance	MDS Setback Affect Subject Application?
1	2076/2078 Battersea Rd.	Beef cattle	576 metres	914 metres	No
2	2132 Battersea Rd.	Beef cattle	517 metres	634 metres	No
3	2147 Battersea Rd.	Horses	244 metres	644 metres	No
4	2590 Battersea	Horses	244 metres	1073 metres	No

	Rd.				
5	2593 Battersea Rd.	Vacant – Beef Cattle	235 metre	1023 metres	No
6	2720 Patterson Rd.	Beef cattle	498 metres	1483 metres	No
7	2750 Patterson Rd.	Dairy cattle	710 metre	1510 metres	No
8	896 Unity Rd.	Horses	240 metres	82 metres	Yes
9	962 Unity Rd.	Horses	187 metres	414 metres	No
10	971 Unity Rd.	Horses	241 metres	522 metres	No
11	1088 Unity Rd.	Beef cattle	363 metres	1057 metres	No
12	1126 Unity Rd.	Vacant – Beef cattle	576 metres	1280 metres	No
13	1166 Unity Rd.	Horses	216 metre	1442 metres	No
14	1175 Unity Rd.	Horses	201 metres	1500 metres	No

The detailed review of the livestock facilities within 1500 metres of the subject lands has shown that only one barn impacts the proposed development. The barn at 896 Unity Road has a calculated MDS I Type B land use setback of 240 metres and is located 82 metres from the property boundary shared with 2285 Battersea Road. Therefore the MDS I setback for the Type B land use projects 159 metres into 2285 Battersea Road (Image 1).

Guideline 40 and 43

In accordance with MDS Guideline 40, MDS I Setbacks for new Type B land uses are measured at the shortest distance from the livestock facility to the area to be zoned for the new commercial use. The application proposes to reduce the MDS Setback from 240 metres to 82 metres, reducing the existing adjacent barns' setback to the shared property line to allow the entire property at 2285 Battersea Road to be rezoned for commercial uses.

The MDS Study and Planning Rationale submitted with the application proposed the application of Guideline 43 to support the reduction of the MDS I setback for the existing barn at 896 Unity Road.

The MDS Guidelines generally prohibit reductions to MDS I distances for new development. However, Guideline 43 of the MDS Guidelines states:

MDS I setbacks should not be reduced except in limited site specific circumstances that meet the intent of this MDS Document. Examples include circumstances that mitigate environmental or public health and safety impacts, or avoid natural or human-made hazards.

Section 8.2 of the MDS Guidelines contains additional information to guide the consideration of MDS setback reductions. Section 8.2 specifically states that the intent

of the MDS I is to minimize nuisance complaints associated with livestock facilities due to odour and thereby reduce potential land use conflicts. Section 8.2 further states that it is only appropriate to consider reductions to MDS I setbacks when reasonable alternative locations are limited, and where there is an attempt to reduce potential odour conflicts while balancing or mitigating against other potential concerns such as environmental impacts, public health and safety or natural and human made hazards.

The Guidelines include questions to consider that further build on the examples included in Guideline 43. These questions include but are not limited to:

- Is the proposed location further away from the surrounding livestock facility than other existing development?
- Is the proposed development similar to others on surrounding lands in the vicinity?
- Would meeting the MDS setback mean that the proposed development would affect surface water features or groundwater features?
- Would siting the new development in a location that met the MDS I setback result in a public safety concern?
- Would the proposed development or building improve the existing situation (the new building is located further away from the livestock facility than an existing building it is replacing)?
- Does the proposed reduction to the MDS I setback permit the new development to meet some other regulatory setback?
- Is the proposed development a logical extension of an existing development or building which may have been successfully sited in accordance with a previous version of the MDS formulae?

Guideline 43 and the questions contained in the Additional Information section of the Guidelines attempt to balance other aspects of the PPS with MDS. Where an MDS setback may result in other concerns such as negative impacts to environmental features, or subject occupants to unsafe standards, a reduction may be considered. There are also practical considerations such as the logical expansion of a building that was previously sited in accordance with MDS, or where a new building is located further away from the barn than an existing building on site.

The submitted Planning Rationale and MDS Study did not identify other concerns such as environmental, public health, or hazards on the subject lands. Both the Rationale and Study did not cite any of the provided examples under Guideline 43 as the basis for the reduction, but rather that the reduction was required because of how MDS setbacks are measured for Type B land uses (measured to the area being rezoned).

The opinion contained in the Planning Rationale outlines that the distance between the existing barn and the property line (82 metres) and the proposed interior side yard setback (9.1 metres) would result in an effective setback distance of 91.1 metres. The report further outlines that the reduction would not result in land use conflicts due to nuisance complaints from odour as the proposed development recognizes the existing

barn and would incorporate a warning clause on the title of the lands. Clientele will also be advised prior to arrival about the potential odour from the existing livestock facilities and that any complaints or concerns will be managed through management staff of the Unity Farm, Inn, and Spa.

The proposal to incorporate a warning clause on title about the presence of the barn, and allowing guests to submit complaints to management of the proposed commercial use, does not reduce the potential for nuisance complaints and does not exempt the property from the requirements of MDS. Therefore, the application is not consistent with the PPS's direction that new land uses shall comply with the MDS formulae.

Guideline 35

The application argued that the proposed development includes characteristics that are consistent with agriculture-related uses and agri-tourism uses, which under Guideline 35, may be exempt from the requirements of MDS. Because Zoning By-law 76-26 does not explicitly identify a requirement to apply MDS I setback for these uses, the Planning Rationale argues that an MDS I setback is not required for these types of uses.

The justification in the Planning Rationale attempts to characterize the proposed land uses as agriculture-related and on-farm diversified uses to support the reduced MDS I setback. The application proposes to re-designate the lands from Rural to Rural Commercial to facilitate the development. The applicant did not review their proposed use against the tests for agriculture-related and on-farm diversified uses contained in the PPS and further explained though Publication 851 – Guidelines for Permitted Uses in Ontario's Prime Agricultural Areas. The application of MDS Guideline 35 is not applicable as the applicants are not proposing the uses as agriculturally related or as on-farm diversified use. Additionally, the uses proposed for the site, uses that are characterized by a higher density of human occupancy or activity, such as food service, accommodation, retail operation, and agri-tourism uses, are specifically identified within Guideline 35 as uses that may lead to conflicts with surrounding agricultural uses and therefore should require an MDS setback.

Official Plan

The submitted Planning Rationale's PPS justification states that reducing the MDS I setback for the introduction of a Type B land use is not anticipated to conflict with provincial or municipal goals of promoting and protecting agriculture, and that the existing barn is already encumbered from expanding by existing adjacent sensitive land uses. The justification concludes by stating that the reduced MDS Setback is desirable as it allows the subject lands to be developed in a manner which is compatible with the rural character of the area without further limiting the potential and future growth of the adjacent horse barn.

The City's Official Plan contains policies that outline the physical separation of livestock facilities and sensitive land uses (2.5.7c, 2.7.8.) as the primary form of mitigating land

use conflict and protecting normal farming practices. One of the criteria to consider in the introduction of a new Rural Commercial use is that the location of newly designated lands, wherever possible, be on the least productive agricultural lands, and on sites that will not hinder agricultural operations (3.14.8.a). Agricultural uses are defined in the Official Plan as including the raising of livestock.

The Planning Rationale's Official Plan justification for the reduced MDS setback is that the nearby livestock operation will enhance the overall aesthetic and authenticity of the experience, which the applicants intend to market to guests; "the presence of the barn will contribute positively to the development (page 37 of the Rationale)." In meetings with the applicant to discuss the MDS concerns identified by the City, an argument was made that horses were not as "stinky" as other animals and therefore new land uses can be located closer to a horse barn than a cattle barn.

MDS setbacks are generally smaller for horse barns than cattle barns. This is not due to the odour potential but rather the density of animals within a barn. Table 1 of the MDS Guidelines – Factor A (odour potential) and Factor D (manure type), outlines the different odour potentials for each livestock type. Horses have a similar odour potential as dairy cows and beef cattle on a per animal basis. The larger setbacks for cattle barns occur because a farmer can fit more cattle than horses in a barn of a similar size, as horses generally require larger stalls than cattle. For example, a barn for 50 horses will generate the same setback as a barn for 50 cattle (340 metres). However, a barn for 50 horses would be 1,161 square metres in size, and the barn for 50 cattle would be 232 square metres. The different odour potential for livestock type is captured within the MDS Guidelines and corresponding setbacks which is a provincially regulated formula. Distance separation is the primary form of mitigating land use conflict in the rural area in the City's Official Plan.

One of the main arguments presented to support the reduction to the MDS I setback was that there are constraints in the area that would limit the existing barns ability to expand. The Rationale in Section 4.2 – page 37, further proposed that a reduction to both the MDS I and MDS II setback for the existing barn at 896 Unity Road is, *"appropriate as it allows the subject lands to be developed in a manner which is compatible with the rural character of the area without further limiting the potential future growth of the nearby farm."*

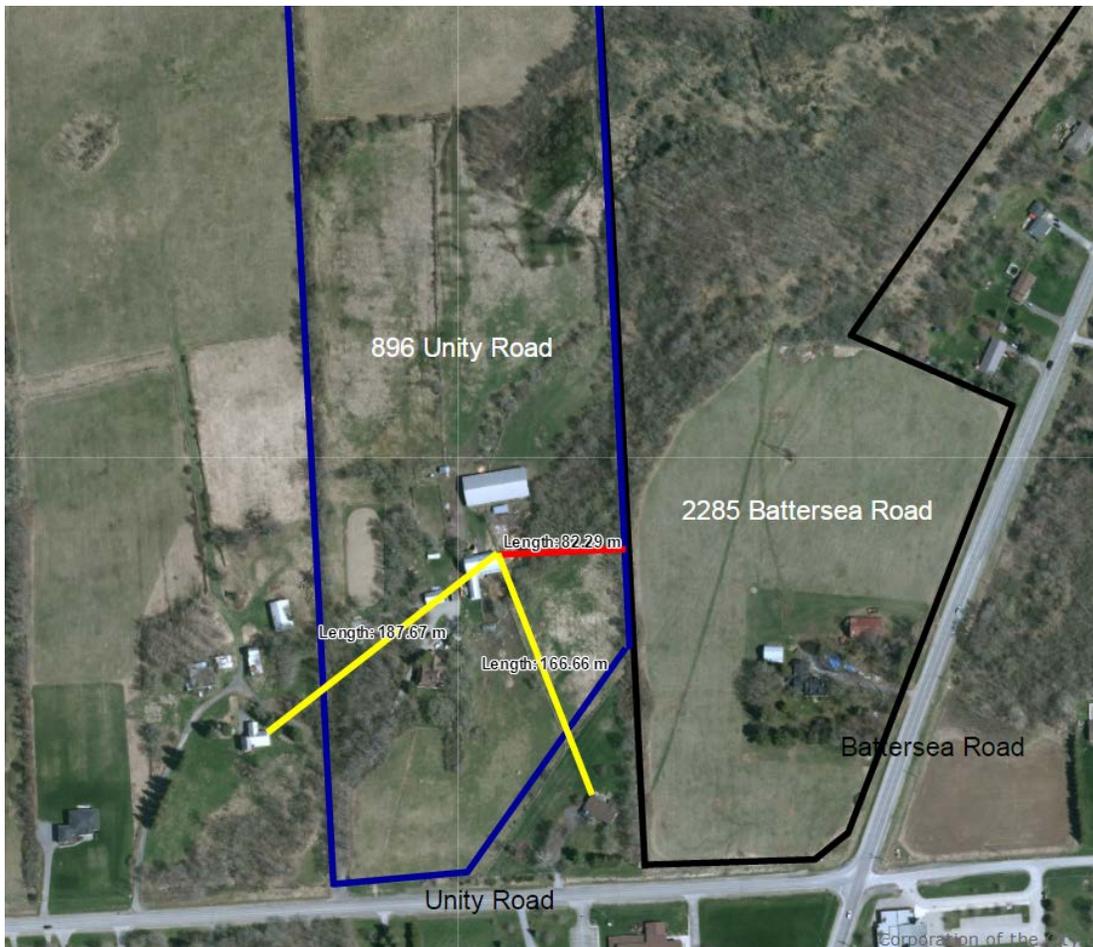
The application recognizes the increased constraint an approved Type B land use would have on the existing livestock facility. From the Rationale, the request to vary the MDS II setback for a potential future expansion of the barn at 896 Unity Road was included with the application to:

"allow the horse barn to expand without being hindered by the proposed Unity Farm, Inn, and Spa. This relief is recommended on the basis that expansion of the existing horse barn would be constrained by other existing uses in the immediate area and the relief in MDS II setback would acknowledge that the

proposed farm, inn, and spa is not the most limiting factor to the barn's expansion (Section 5.8, page 63 of the Rationale)."

The existing barn at 896 Unity Road is bordered by properties developed with single detached dwellings, a church, and a nearby school. While these are all limiting factors, the proposed commercial use (Type B land use) represents a greater constraint on the barn's ability to expand than the existing dwellings (Type A land use) bordering the property for two reasons; the first is that it would be the closest land use to the existing barn; and secondly, the expanding barn would have to be located double the distance away from the commercial use than any of the existing dwellings in the area.

Image 2 – Distances from adjacent uses. Yellow lines show distances to the nearest dwellings. Red line shows distance proposed commercial land use rezoning.



A new barn could not be located deeper into the property at 896 Unity Road as the entire property line shared with 2285 Battersea Road is proposed to be rezoned. In accordance with MDS Guideline 40, MDS II setbacks are measured as the shortest distance between the point of new construction and the area that is zoned. Therefore

the entire lot line of 2285 Battersea Road would be considered a constraint as all MDSII setbacks would be measured to the lot line.

If the Inn and Spa were approved with an 82 metre setback, the property at 896 Unity Road would not be able to expand their barn as of right and would require approval for a minor variance or zoning by-law amendment to reduce the MDS II setback. This hindrance is clearly stated in the Rationale (Section 5.8 – page 63) that without a variance to the MDS II setback for the barn at 896 Unity Road the proposed zoning for the Inn and Spa would be the most limiting factor to the barns expansion.

Approval of the reduced setback would create a hindrance on the adjacent agricultural operation, as the new use would be located closer to the barn than what is currently permitted by the MDS I setback creating difficulties for its expansion in the future. The application therefore does not conform to the City's Official Plan where distance is the primary form of mitigation and new Rural Commercial uses shall be located on sites that do not hinder agricultural operations.

Case Study Review

To understand how similar requests have been handled, planning staff reached out to municipalities across Ontario asking if any other municipality has varied a MDS I setback for a Type B land use. Subject matter experts at the Ontario Ministry of Agriculture Food and Rural Affairs (OMAFRA) were consulted to understand if they were aware of examples across Ontario where a MDS I setback for a Type B land use had been reduced. Examples from MDS cases before the Ontario Municipal Board (OMB) were also reviewed.

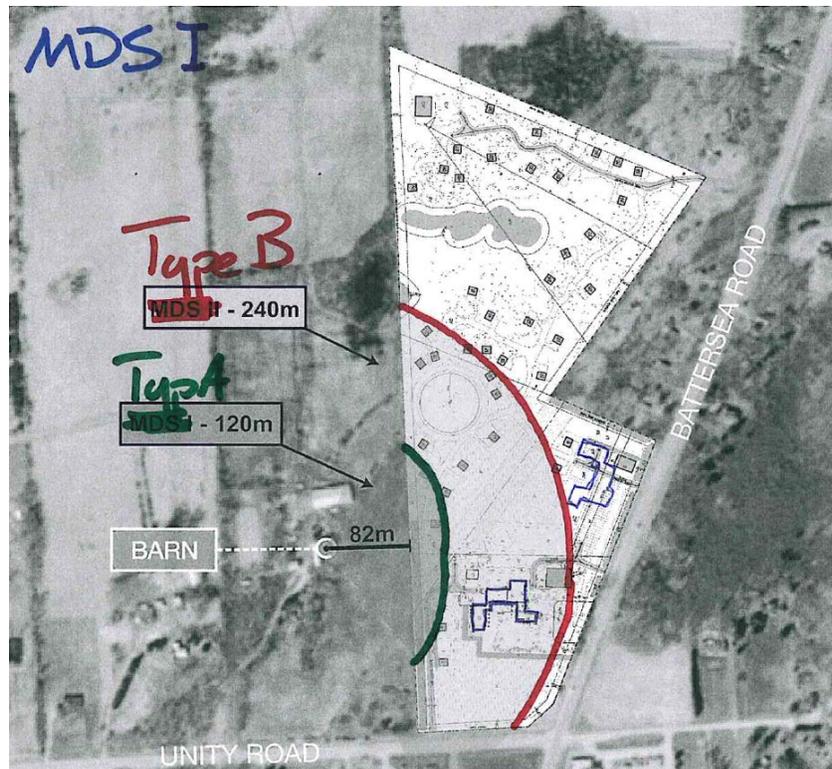
No examples were found where a reduction to an MDS I setback for a new Type B land use was supported. The only examples where the MDS I setback was reduced was for single detached dwellings (Type A land uses) where the MDS I setback pushed the building envelope into environmental constraints or unbuildable areas. The setback reductions were supported in the examples reviewed because the landowner was able to demonstrate that a reduced setback was locating the dwelling outside of environmental features (swamp, water feature, flooding hazard, or other environmental constraint) while being located as far as possible from the adjacent barn. There were no examples of cultural heritage considerations or other planning arguments outside of the examples cited in Guideline 43 (mitigate environmental or public health and safety concerns, or avoid natural or human made hazards) and Section 8 of the MDS Guidelines, used as justification to support a reduced MDS I setback.

Land Use Rearrangement

There is land available outside of the MDS I setbacks on the subject lands. These lands present an opportunity to consider a different land use configuration that would move the commercial uses such as the spa, cabins, restaurant, event centre, and inn outside of the Type B setback, and therefore comply with MDS Guidelines. Type A land uses

such as agricultural uses and uses related to the agriculture could be located within the Type B setback areas.

Image 3 – Potential land use re-arrangement



Summary and Options Moving Forward

Based on the above review of application D35-003-2019 as submitted, the proposal is not consistent with the Provincial Policy Statement, 2014, and it does not conform to the City's Official Plan. To address consistency with the PPS and conformity to the City's Official Plan, the official plan amendment and zoning by-law amendment need to be made compliant with the MDS setbacks.

We would be happy to work with you to review the proposed uses and consider alternative arrangements for the proposed uses on site. You should consider categorizing the proposed land uses into separate Type A and Type B land uses. The site can then be split zoned to allow the different uses on site in accordance with the applicable MDS I setback.

Should you have any questions on this matter, please contact the undersigned at (613) 546-4291, ext. 3213.

Thank you,

A handwritten signature in blue ink, appearing to read 'James Bar', with a long horizontal stroke extending to the left.

James Bar, MPL, RPP, MCIP
Senior Planner
Planning, Building & Licensing Services

2285 Battersea Road

Minimum Distance
Separation Sketch
Barns #4-6

Legend

- Subject Property
- Proposed Lot Line
- MDS Setback
- Reduced MDS & 120-degree Arc
- Barn with Reduced MDS
- Lots Considered per Guideline #12
- Existing Dwelling

Disclaimer: Distances are approximate. All measurements are made using online GIS software and should not be taken as a substitute for a legal survey prepared by an Ontario Land Surveyor.

Client: BPE Development
Prepared By: KJ
Reviewed By: YL
Date: 09/11/2019



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2285 Battersea Road

Minimum Distance
Separation Sketch
Barns #3, #7-9

Legend

- Subject Property
- Proposed Lot Line
- MDS Setback
- Reduced MDS & 120-degree Arc
- Barn with Reduced MDS
- Lots Considered per Guideline #12
- Existing Dwelling

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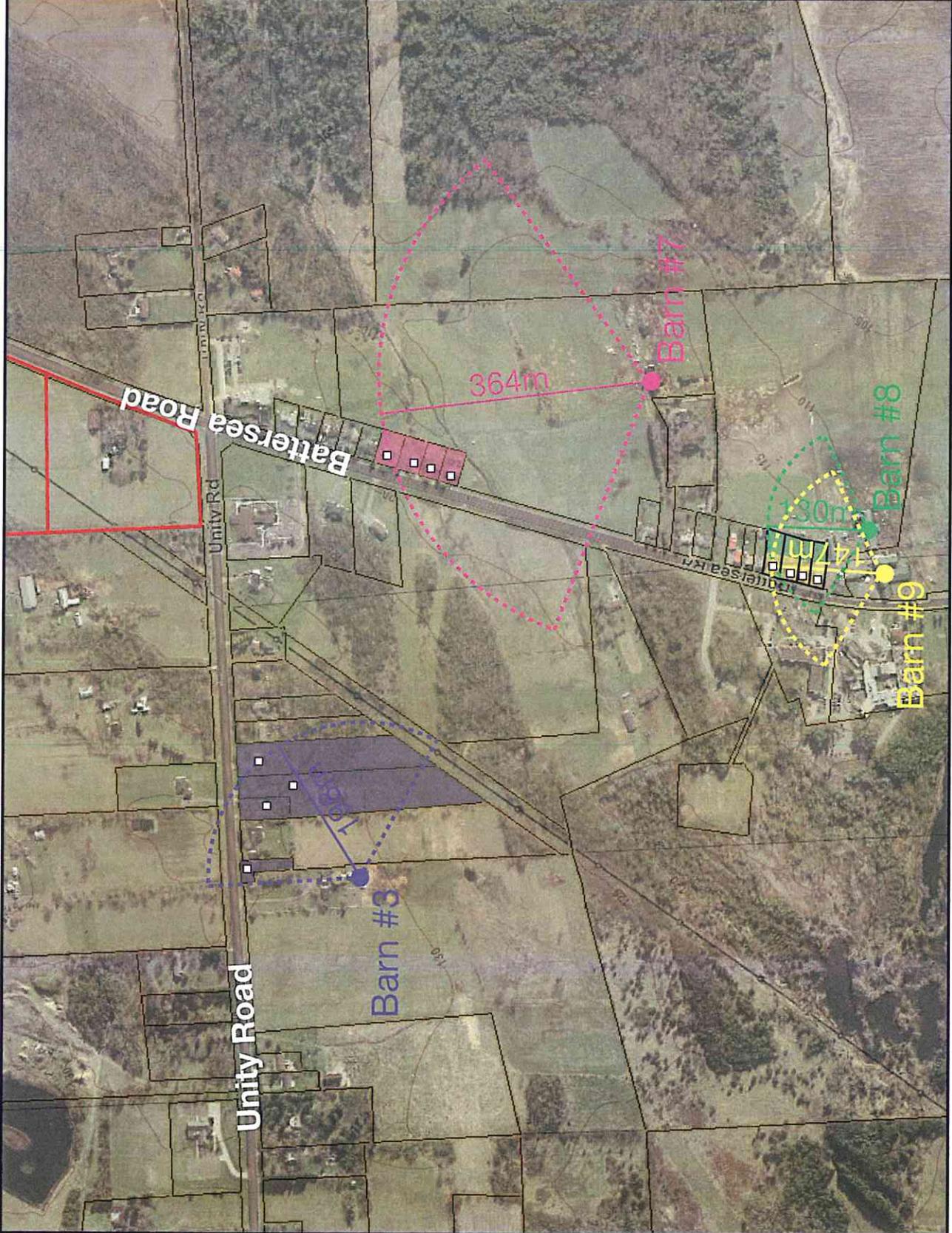
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2285 Battersea Road

Minimum Distance
Separation Sketch
Barns #10-13

Legend

- Subject Property
- Proposed Lot Line
- MDS Setback
- Reduced MDS & 120-degree Arc
- Barn with Reduced MDS
- Lots Considered per Guideline #12
- Existing Dwelling

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