



May 25, 2018
Our File: 317038-1

Township of North Huron
P.O. Box 90, 274 Josephine Street
Wingham, Ontario N0G 2W0

Attention: Mr. Dwayne Evans
Chief Administrative Officer

Re: GJAJ Holdings Ltd.
Rutledge Subdivision, Blyth
Deviation from Township Standards

Dwayne,

Thank you for meeting with us regarding the proposed GJAJ Holdings plan of subdivision in Blyth. As noted at that meeting by the owner, Mr. Gary Rutledge, we would like to request deviations from the Township's *Draft* Development and Servicing Guidelines, as is permitted by Section 1.10. While we understand why the standards are in place, adhering to them in a small development in a community like Blyth produces a design that is not feasible to construct based on the projected value of a serviced residential lot.

The particular sections of the guidelines we would like to request relief and/or deviation from are as follows:

Section 3.1 – Roads

“Minimum road asphalt width shall be 8.5 metres.”

- We propose to construct the roadways in this development using an asphalt width of 8.0m. We submit that roads of 8.5m in width are necessary only in higher volume developments. 8.0m width roadways are in common use in small subdivisions and local residential streets, and are more than sufficient for the expected traffic volumes and uses.
- We also note that North Huron's draft standards mandate a 20.0m right-of-way width at a minimum. However, 18.0m rights-of-way are in relatively common use in Ontario for small developments, and would have been more than sufficient for this subdivision. Designating more land than we believe necessary to the road right-of-way has deprived the owner of saleable lands. While we are not requesting a reduction in the right-of-way width, we are suggesting that the proposed reduction in asphalt width would be a fair compromise in this case given the loss of saleable property.

Section 3.4 – Road Construction

“Road subdrains shall be provided in accordance with OPS 405.05...”

- This statement has typically been interpreted to mean that subdrains are required for the full length of each and every street. However, we note that OPS 405 does not require subdrains for the full length, nor does North Huron's standards mandate the use in this manner either. In general, subdrains are only required where road grades are relatively flat and/or soil conditions warrant additional drainage. For this development, we proposing to install 100mm dia. subdrains only in areas where the proposed road grade is less than 2%.

Section 3.6 – Curbs

“Concrete curb and gutter, of cross-section approved by the Municipal Engineer, shall be provided along all edges of paved roadway surface.”

- Consistent with a typical road cross section commonly found in a small village, we are proposing to omit concrete curb and gutter on the new streets. While it has been postulated that curb and gutter provide for a longer asphalt life, we know of no evidence which supports this assumption on low volume roads. For a small development such as is proposed, curb and gutter will likely have no appreciable impact on the life of the paved road surface. Road drainage will continue to be provided by on-street storm sewers with catch basins, and the omission of curbs will not be detrimental to the overall drainage of this development.

Section 3.7 – Sidewalks

“A 1.5 metre sidewalk shall be constructed on one side (minimum) of each street within the development.”

- We are proposing to omit sidewalks within the development. Currently, no sidewalk inter-connectivity exists. There are no sidewalks on North Street, and there are no sidewalks on Queen Street in the vicinity of the new street proposed for the development. Given the expected low traffic volumes this development will generate, and the lack of connectivity to existing sidewalks, we do not believe that sidewalks will be functionally necessary.

Section 4.9 – Private Drain Connections

“Private storm service connections (PDC) are required for all lots or units in the new development.”

- We are proposing to not install storm service laterals to each lot and instead have sump pumps discharge to the surface. This will put less strain on the storm system, and also help to remove contaminants from rainwater discharge prior to outlet into the Blyth Creek.

Appendix ‘B’, Section B – Lot Grading, 3.0 Lot Grading Design

“The maximum length of a rear yard swale between outlets shall be 90 metres.”

- We are proposing a greater spacing to reduce the number of rear yard catch basins and storm leads and therefore eliminating the need for some side yard easements. A substantial portion of this development abuts farm fields, and we believe that longer swales will perform quite satisfactorily as minor, incidental overflows will generally not be impacting residential properties.

We would also like to take this opportunity to suggest that Council, when considering the Draft Development Standards, also take in to account the cost/benefit and the financial impact of what these standards entail. While we are not opposed to development standards, quite the opposite in fact, we also understand the financial impact they can have on development. In areas of historically lower land values, updates and changes to development standards can result in projects that may have been marginally viable becoming unfeasible. A “one size fits all” approach is not appropriate, and will serve only to drive development to larger urban centres where land values are high, thus continuing the population decline in small town Ontario. Land development is inherently a high risk activity, and we respectfully request Council’s support in order to help bring this important development in the village of Blyth to fruition.



Thank you in advance for your consideration.

Yours truly,

GM BLUEPLAN ENGINEERING LIMITED

Per:

A handwritten signature in black ink, appearing to read 'Matt Ash'.

Matt Ash, C.E.T.
Branch Manager, Partner

c. G. Rutledge – GJAJ Holdings Ltd.