



# Planning and Development

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November 9, 2023

Michael Benner  
Township of Georgian Bluffs

**RE: Z-07-23 DeStafano – 10-unit Tiny House development**  
**Civic: 469 Princess Street**  
**Legal: PLAN 857 PT LOT 31 RP16R;3098 PART 6**  
**Roll: 420362000915001**  
**Shallow Lake, Township of Georgian Bluffs**

Dear Mr. Benner

This correspondence is in response to the above noted pre-circulation application. We have undertaken a preliminary review of the application in relation to the Provincial Policy Statement (PPS) and the County of Grey Official Plan (OP). We offer the following comments.

Zoning Amendment Application Z-07-23 proposes to amend the zoning on the subject lands to permit a 10-unit “cottage style” residential development on the subject lands. The development will be serviced with municipal water and a communal sanitary system. Access will be provided from Joynt Street. The subject property is currently vacant and largely tree covered. It is surrounded by low-density residential uses to the north, east and west; and rural-agricultural uses to the south.

At this time, the applicants have submitted an informal concept plan. No other studies or documentation have been provided to support the feasibility of this proposal at the time of providing the comments below.

## **Planning Comments:**

Schedule A of the County OP designates the subject property as ‘Secondary Settlement Area.’ The subject lands are located within the village of Shallow Lake. Section 3.6(3) of the County’s Official Plan states:

3) *Where partial services exist in a Secondary Settlement Area, development shall only be permitted to allow for the development of vacant and/or underutilized lots, as well as the creation of lots, subject to satisfying the following requirements:*

*a) The development is within the reserve sewage system capacity or reserve water system capacity;*

*b) Site conditions are suitable for the long-term provision of such services;*

*c) The development is within the existing settlement area;*

*d) Allow for infilling and minor rounding out of existing development (see Section 8.9.1(10)(c)).*

County staff acknowledge that partial servicing is available within Shallow Lake, in the form of municipal water. That said, the proposed application has not demonstrated that there is sufficient availability of municipal water services to sustainably service this proposal. Further clarification is required in this respect. The proposed development would be serviced by an on-site communal private septic system. Where sewage flow rates exceed 10,000 litres per day, review and approval of large private septic systems is required by MECP. At this time, staff have not received any information related to anticipated septic needs or design. Staff would recommend that a Functional Servicing Study be undertaken to ensure that the site can be viably accommodated on municipal water and a private communal septic system as proposed.

Appendix A of the County's Official Plan indicates that the subject property falls entirely within a mapped 'Karst Area.' Karst topography refers to the erosion, dissolution or fracturing of bedrock. Karst formations have the potential to influence the movement of water on site (including below-ground streams), overall site stability, as well as providing channels for contaminants to enter groundwater supplies. Section 7.5 of the County's Official Plan states:

*In areas mapped as 'Karst Area' on Appendix A, it will be necessary for the proponent of any planning application to provide an assessment of the proposed area of development. Often, this can be accomplished by on-site test holes, however in some circumstances broader landscape features may indicate karst and may indicate the need for further assessment/confirmation. Depending on the site and the scale of the development, an environmental impact study, Hydrogeological or Karst Study, completed by a qualified individual may be required.*

Given that ten dwellings are proposed on this site, in addition to a large communal septic system, County staff would recommend that a fulsome karst assessment be conducted on the site, prior to any approval of this development. This study shall ensure

that the proposed development can be safely constructed on site, with no impacts to site stability, groundwater contamination, etc. If karst is identified on site, the karst assessment may indicate recommended setbacks and/or mitigation measures depending on the type and extent of karst identified. Karst is considered a natural hazard feature and further comments should be provided by Grey Sauble Conservation Authority in this respect.

Appendix B indicates that that the subject property is entirely covered in 'Significant Woodlands.' In this respect, County Planning Ecology staff have undertaken a site visit to the subject property. The following comments have been provided:

*The property contains and/or is adjacent to significant woodlands, significant wildlife habitat and potential habitat for threatened and/or endangered species. It is Grey County staffs understanding that the proposed development will be located within and/or adjacent to these features. The proposed development is low impact in nature, with minor tree removal needed to accommodate the proposed development. Eco-friendly septic infrastructure is proposed. As such, it is Grey County Staffs opinion that the requirement for an environmental impact assessment may be waived if the potential impact to natural heritage is appropriately mitigated. This mitigation can be accomplished if all trees needed to be removed for development are replanted at a 2:1 compensation rate, and tree removal is restricted to a time outside of April 1- August 15. We recommend the landowner and/or the consultant contact ecology@grey.ca to develop a tree planting/compensation plan that will enhance natural connectivity of natural features on and around the parcel proposed for development.*

#### *Stormwater Management*

*A qualified engineer shall address how storm water will be managed on site. This may be completed as part of the Servicing Study. Given the size of the property and relatively low building footprint of the proposed buildings, a fulsome stormwater management study may or may not be required. Should additional stormwater management infrastructure be required, outlet water quality will need to be secured and provide enhanced treatment as defined by the MECP. An erosion and sediment control plan will be required.*

#### *Source Water Protection*

*It is Grey County Staffs understanding that the property does not contain areas that are subject to policies of the Source Water Protection Act. The property does however lie within an area designated as potentially having influence on highly vulnerable aquifers, as such, low-impact development and infrastructure is strongly recommended, such as permeable pavement.*

County staff would note that the above comments have been made without the benefit of a prepared Planning Justification Report or review of a comprehensive site plan. County staff reserve the right to request additional information through a scoped EIS if the proposal appears to be more substantive than what has been described by the applicant to date.

Generally, the County's Official Plan is supportive of a wide array of housing types across the housing spectrum. Small homes or 'tiny houses' are one option that may present a more affordable home ownership opportunity to some demographics. While County staff are conceptually supportive of this proposal and recognise the substantive need for affordable housing options throughout the region, staff acknowledge that the proposal may be premature at this time.

As discussed previously with the applicants, there are several studies that County staff would expect to see to support this development, to ensure that this proposal could move forward with respect to the safety and well-being of residents living on the site and adjacent properties. At minimum, these would include a karst assessment and a functional servicing study that addresses water, sewer and stormwater considerations. Staff would also require a more comprehensive site plan showing intended setbacks and building envelopes for the proposed units to ensure that natural heritage considerations can be achieved. A Planning Justification Report prepared by a Registered Professional Planner would ensure that the proposal is aligned to the Township and County's Zoning By-Law and Official Plan(s), as well as the direction of the PPS and Planning Act.

**Summary:**

In summary, County staff would suggest that a decision on the proposed development may be premature at this time. The County would request additional information regarding on-site karst features, servicing and stormwater management to ensure the feasibility of the proposal, in addition to a detailed site plan to ensure zoning compliance and natural heritage considerations.

Staff also note that it is not clear whether the applicants intend to rent out all units on the subject property, or to undertake a Plan of Condominium which would permit the units to be independently owned, while other site features (such as walkways, parking areas, septic system) would be maintained in communal ownership. Grey County would be the decision-making authority for any Plan of Condominium application, while the Township of Georgian Bluffs would approve any Zoning By-Law Amendment.


County staff reserve the right to amend the above comments subject to additional review and information regarding the subject property and proposed development.

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County staff are open to further discussion and engagement on the above comments with the applicants and Township staff.

Please let me know in case of any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Hillyer". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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