



RON DAVIDSON
LAND USE PLANNING CONSULTANT INC.

February 13, 2026

Township of Georgian Bluffs
177964 Grey Road 18
R.R. #3
Owen Sound, ON
N4K 5N5

Attention: Ben Suchomel, Planner

Dear Ben:

**Re: Zoning By-law Amendment Application
Part Lot 9, Plan 857, Geographic Village of Shallow Lake
(Part 1, RP 16R12113)
Township of Georgian Bluffs
Owner: Matt Brown**

Further to recent discussions with your office involving the above-noted property, enclosed please find a Zoning By-law Amendment application. Also enclosed are an engineered Site Plan showing lot grading and a letter addressing the suitability of the site for a private septic system.

To assist your office in its review of the application, I offer the following:

Proposal:

Matt Brown owns a residential property located along the south side of Main Street, in the settlement area of Shallow Lake. The property is vacant, except for a shed that is slated for removal.

In 2024, Township Council approved a site-specific Zoning By-law Amendment that permits a townhouse development involving a maximum of four units. Construction has not yet occurred. Mr. Brown has since learned that increasing the number of units to five is necessary in order to make the development viable. Since the By-law approved two years specifically states that the number of units shall be limited to four, a further amendment to the Zoning By-law is necessary.

The proposed development is illustrated on the attached engineered Site Plan.

The townhouses will be one-storey rental units designed for Seniors. Municipal water and a private septic system will service the new dwellings.

Subject Lands:

The subject property is located in the northwest section of Shallow Lake, along the south side of Main Street.

The property comprises 2558 square metres of land and is currently occupied by a shed, which will be removed.

Adjacent Land Uses:

Adjacent lands uses include detached dwellings to the east, south, and west, and a ten-unit apartment building to the immediate north.

County of Grey Official Plan:

The subject property is designated 'Secondary Settlement Area' on Schedule A to the County of Grey Official Plan. This land use designation applies to partially-serviced and privately-serviced urban areas, and it is intended to provide a limited opportunity for growth and promote a range of living styles and employment opportunities. Permitted uses in the 'Secondary Settlement Area' include residential uses, commercial and dry industrial uses, public uses, recreational uses, and institutional uses.

According to Section 3.5 *Secondary Settlement Areas*, the following policy applies to development within Shallow Lake:

- 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)).*

With regard to this policy, please note the following:

- Municipal water is available to service the five townhouse dwellings;
- GM BluePlan Engineering had prepared a D-5-4 (Nitrate) Study in support of the 2024 rezoning that determined that the site conditions are suitable to accommodate a septic system for four townhouse dwellings. Clearwater Shores Engineering has provided a follow-up assessment that has determined that an additional dwelling could be erected and still meet the Province's nitrate standards. This recent assessment is included in this Zoning By-law Amendment application submission;
- The subject property is located within Shallow Lake, which is a recognized settlement area in the County Official Plan;
- Section 8.9.1 of the Official Plan pertains to servicing. The intended development clearly conforms to paragraph (10) (c) which states:

Development on partial municipal services can include development of vacant and/or underutilized lots, as well as the creation of lots for infilling and minor rounding out, in accordance with the settlement area policies and the requirements noted above. Infilling and minor rounding out can include the creation of new lots from existing lots that are located within the current designated settlement area land use type subject to the findings of the Servicing Options Study.

Please note that a Servicing Options Study has not been required, given that sanitary services are not available and that the concept of introducing a communal system in Shallow Lake for the sake of the five-unit townhouse development is obviously not feasible. It is worth noting, however, that the five units will be sharing one septic system.

The housing policies contained in Section 4 *Live Grey* of the County Official Plan are supportive of new housing developments that involve infilling, intensification, rental housing, and accommodations for Seniors. The proposal would clearly be supported by all policies of this nature.

It is evident that the proposed development conforms to the County of Grey Official

Plan.

Township of Georgian Bluffs Official Plan:

The subject lands are designated 'Residential' on Schedule A of the Georgian Bluffs Official Plan. The following policies apply:

3.4.1 RESIDENTIAL

Residential areas are important components of settlement areas and should be developed in a manner that supports a high quality of life. Given the rural nature of the Township, the historic housing preference has been the single detached dwelling. However, given the past statistical trends which depict an ageing population and a declining household family size, demand for other housing formats may shift from the traditional detached dwelling. The residential policies for settlement areas within this plan are therefore aimed at recognizing this predominance for the single-detached dwelling while encouraging other housing formats. Emphasis is placed on facilitating differing housing formats and densities within settlement areas with careful consideration being given to compatibility, sufficient amenity and servicing availability to ensure a high quality of living is provided for residents.

3.4.1.1 PERMITTED USES

The permitted use of lands designated "Residential" shall include single detached dwelling units, semi-detached and duplex units, townhomes and may include secondary suites and low-rise multiple dwelling unit structures.

Other uses compatible with residential development may also be permitted and include:

- *Home occupations*
- *Bed and breakfast establishments*
- *Seniors/retirement homes*
- *Nursing homes and assisted living facilities*
- *Garden Suites*
- *Day nurseries*
- *Open Space uses in accordance with Section 3.4.4*
- *Neighbourhood commercial uses in accordance with Section 3.4.2*
- *Institutional and community facilities.*

3.4.1.2 MEDIUM DENSITY HOUSING POLICY

1. *Medium density housing proposed near existing single family dwellings shall be*

designed and oriented to conform visually to nearby residential areas. Physical buffering measures also need to be considered. New medium-density development shall respect the massing, composition and architectural design of the surrounding area.

2. *Medium density development should be encouraged in proximity to commercial areas and arterial or collector roads in an effort to enhance accessibility to various community services and amenities.*
3. *When reviewing proposals for new medium density residential development, consideration should be given to the following criteria:*
 - a) *Compatibility with existing land uses in the immediate area and designed in a manner to be consistent with the general built form of surrounding buildings.*
 - b) *Suitable landscaping, lot grading and stormwater management/drainage shall be provided in accordance with the stormwater management policies of this Plan.*
 - c) *Suitable on-site open space shall be provided which is appropriate for the size and nature of the development. Environmentally sensitive lands will not necessarily be accepted as suitable on-site open space and a “cash-in-lieu” of parkland dedication may be considered in such circumstances, at the sole discretion of the Township.*
 - d) *Water Supply and sewage disposal services shall be provided in accordance with Section 5.*
 - e) *Adequate off-street parking and appropriate means of access and circulation for vehicular traffic, including emergency and service vehicles shall be required.*

With regard to the above, please consider the following:

- Townhouses are permitted in the ‘Residential’ designation;
- The townhouses will be compatible with the existing built neighbourhood. A ten-unit apartment building exists to the immediate north, which has a much higher density than the proposed five-unit development, and this apartment building has already established this area as a mixed density neighbourhood. With regard to the adjacent detached dwellings, townhouses are considered to be compatible with detached dwellings, as both are: (a) used for residential purposes; and, (b) low-rise buildings, i.e. one or two storeys in height. As well, the townhouse

proposal has a relatively low density despite its “medium density” label. It is important to understand that the term “compatible” doesn’t mean “same as” but rather being able to coexist without causing significant problems with regard to bulk/massing of buildings, noise, traffic, etc. It should also be noted that existing mature tree vegetation on the adjacent properties will assist in providing a partial visual buffer;

- This development is located within close proximity to Princess Street. The site is approximately 280 metres from this arterial road, when traveling by vehicle;
- Clearwater Shores Engineering has prepared an engineered Site Plan that addresses stormwater management;
- Each townhouse unit will have a significant private amenity area, as rear yards of over 25 metres in depth will be provided, as illustrated on the Site Plan;
- The original D-5-4 (Nitrate) Study demonstrated that the site conditions were suitable to accommodate the four townhouse units, as required by Section 5 of the Official Plan; and, the subsequent review by Clearwater Shores Engineering has proven that an additional townhouse is acceptable under Provincial standards. The new engineered Site Plan also demonstrates that surface water can be accommodated in an acceptable manner; and,
- Each townhouse will be provided with two parking spaces in its own driveway. Emergency and service vehicles should experience no difficulty in accessing the dwellings.

Section 2.6.5 *General Housing Policies* provide a series of policies that encourage the type of housing development being proposed by the Zoning By-law Amendment applications including the following:

- 6) *In order to enhance affordability and to create a more efficient use of land, reduced municipal development standards may be considered, where appropriate. New development or redevelopment proposals where such development standards would be considered may include, but are not limited to:*
- *areas of high density development;*
 - *areas where appropriate servicing is available, and;*
 - *innovative housing design concepts are proposed.*

Reduced development standards may include innovative options for:

- *street right-of-way widths and cross-section designs,*
- *parking requirements,*
- *building location setbacks and requirements,*
- *the location of open space and amenity areas,*
- *the provision of landscaping features.*

Where a reduction in standards is considered for a development, site plan control, plan of condominium development and the zoning by-law shall be used to regulate and implement such reduced standards.

- 7) *The Township shall promote a mix of affordable and quality housing accommodation. The type and location shall meet the present and future needs of all residents while ensuring that new residential development is in keeping with the character of the community and current servicing capacity.*
- 8) *The Township will encourage intensification and infill as a means of increasing the supply of housing, provided such projects are in keeping with environmental considerations, adjacent land uses and there is a demonstrated demand for the type of housing units under consideration.*
- 9) *The Township shall strive to achieve a target of 15% of new residential development within Primary and Secondary Settlement areas through means of intensification.*

Also of importance to the Zoning By-law Amendment application is the following policy which promotes medium density development and rental housing, both of which are proposed for the subject lands:

2.6.5 HOUSING TYPES

The Township shall support a range of housing types which is reflected in subdivision design standards in a manner that is consistent with the needs of residents.

The Township shall strive toward ensuring the following targets relating to housing mixture is reflected in new residential development over the planning period:

Low Density Residential - 75%
Medium Density Residential - 25%

The Township shall also strive toward ensuring the following targets relating to housing tenure is reflected in new medium density residential development over the planning period:

Ownership - 65%
Rental - 35%

Based on the foregoing, it is evident that the proposed Zoning By-law Amendment conforms to the Georgian Bluffs Official Plan.

Provincial Planning Statement:

The Provincial Planning Statement (PPS) encourages urban type development such as townhouses to occur within the designated settlement areas.

The PPS promotes a variety of housing types and densities in order to ensure housing for everyone. Rental housing is also strongly encouraged.

Furthermore, the efficient use of land and infrastructure is required by the PPS. Partially serviced development can be considered in rounding out and infilling situations provided the site conditions are appropriate for the long term.

It is evident that the proposed development is consistent with the PPS.

Municipality of Georgian Bluffs Zoning By-law:

The subject lands are zoned 'RM1-97-h' (Residential Multiple One) on Schedule A of the Township's Zoning By-law, as amended by the Zoning By-law Amendment that was approved by Council for this site in 2024.

This site-specific zone was established to restrict the number of townhouses to four. It also applied a series of zoning provisions regarding lot area per dwelling unit, lot frontage, front yard, side yard, rear yard, building height, and lot coverage. This was necessary because the Township's Zoning By-law did not contain any provisions whatsoever for partially-serviced development in the 'RM1' zone, which clearly was an oversight considering that no lands within the Township are fully serviced except for lands within the Cobble Beach settlement. The new five-unit townhouse development required these provisions to be revisited.

It is recommended that the text of the 'RM1-97' zone be replaced with the following:

Notwithstanding Section 9.4 of this By-law to the contrary, on lands legally described as Part Lot 9, Plan 857, Geographic Village of Shallow Lake and identified as Residential Multiple One Exception 97 (RM1-97) Zone of Schedule A, Map 44, five townhouse units shall be permitted on the basis of partial servicing (i.e., municipal water services and private on-site sewer services) subject to the following:

- a) *Minimum lot area: 510 square meters / unit;*
- b) *Minimum lot frontage: 58 metres;*
- c) *Minimum front yard: 7.5 metres;*
- d) *Minimum interior side yard: 3 metres;*
- e) *Minimum rear yard: 20 metres;*
- f) *Maximum building height: 10 metres; and,*
- g) *Maximum lot coverage: 20%, inclusive of all buildings and structures.*

Planning Discussion:

The concept of a townhouse development on the subject property was supported and approved by Township Council in 2024. The adopted By-law included a four-unit limit because Mr. Brown was only proposing four townhouses at that time.

Mr. Brown has since determined that five townhouse units are necessary to make the project viable; however, this requires another amendment to the Zoning By-law.

The townhouse development on the subject lands was considered two years ago to be in conformity with the County Official Plan and the Township Official Plan, while also being consistent with the Provincial Planning Statement. This position should not change with the addition of one more townhouse unit.

Whether the townhouse development involves four units or five should not have any negative impact in terms of land use compatibility. The site can easily accommodate another unit and the associated parking, and it is suitable for the site.

Of most importance in the consideration of this rezoning request is the fact that the site conditions are suitable to handle the sewage disposal of five townhouse dwellings in

accordance with Provincial standards, as demonstrated in the nitrate review conducted by the Engineer.

Based on the foregoing, both applications have merit and should be approved.

Final Comments:

I trust this information is satisfactory. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

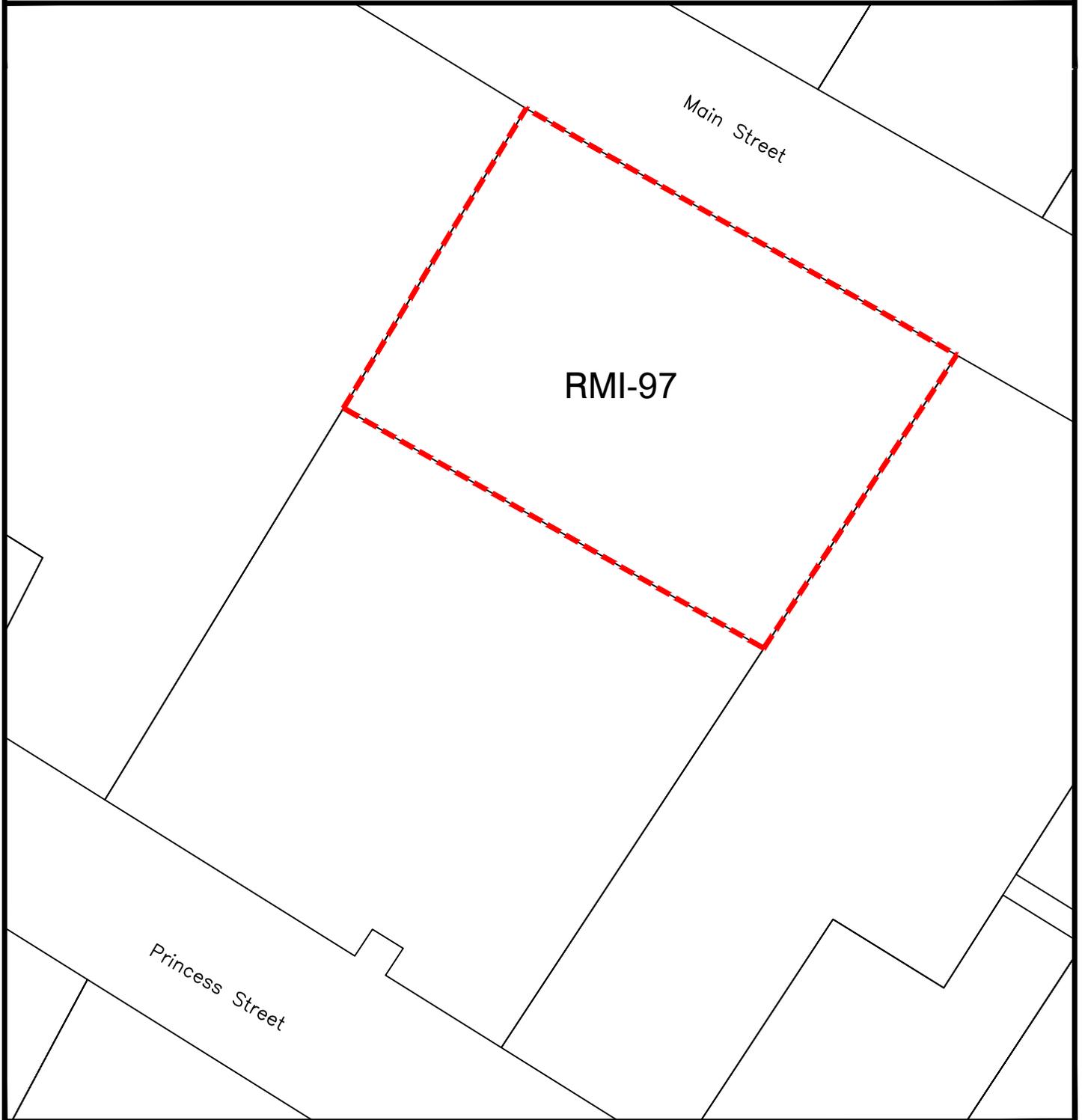
A handwritten signature in blue ink, appearing to read 'R. Davidson', with a stylized flourish at the end.

Ron Davidson, BES, RPP, MCIP

c.c. Matt Brown

Proposed Rezoning

 Subject Lands



Townhouse Development
Shallow Lake

RD **RON DAVIDSON**
LAND USE PLANNING CONSULTANT INC
OWEN SOUND, ONTARIO
SCALE 1:700