

October 30, 2023

BY EMAIL

Town of The Blue Mountains
32 Mill Street, P.O. Box 310
Thornbury, ON N0H 2P0
Tel. 519.599.3131
Fax 519.599.7723

Attn: Adam Farr, MCIP RPP
Senior Planner

Re: 16-0043 GBC Enclave – Applications for Draft Plan of Vacant Land Condominium and Zoning By-law Amendment – Response to Letter of Incomplete Application

Please find responses below to comments provided in the Letter of Incomplete Application, dated August 25, 2023. We trust that the additional supporting materials and the responses below are sufficient for the applications to be deemed complete in accordance with Section 34(10.4) and Section 51(19.1) of the *Planning Act*.

The comments outlined in the Letter of Incomplete Application are outlined below in ***bold italics***, with our comments/responses immediately following.

Required Materials

1. *Landscape Analysis and Tree Inventory and Protection/Retention Plan.*

Comment: A Landscape Analysis, prepared by Envision Tatham, is attached in accordance with Section 3.7.4.3 of the Official Plan.

The Landscape Analysis details the physical and visual complexities of the site and provides recommendations for preservation, enhancement, and mitigation measures. These measures include:

- Maintaining the vegetated buffer provided within the proposed open space block, including further fortifying the buffer with native species where clearings exist (e.g., locations of the existing internal trails).
- Investigating the viability of planting a rear yard buffer on lots 12-15 adjacent to the proposed road widening block to maintain the buffer if/when the existing vegetation is removed to accommodate a road widening. While not explicitly outlined in the Analysis, this recommendation could also be considered in the case that a construction of a municipal trail is required within this block.
- Consider planting boulevard trees internal to the site; and

- Consider foundation planting that is consistent with the existing condominiums on Georgian Bay Lane.

The existing internal trails on the subject lands are also noted to be located close to the property line in several locations resulting in gaps in vegetation along the periphery. While not included as a recommendation, the feasibility of providing plantings in these locations to establish a vegetative buffer to adjacent woodlots will be investigated in preparation of a detailed Landscape Plan and Tree Preservation/Enhancement Plan.

A detailed Landscape Plan and a Tree Preservation/Enhancement Plan will be submitted following draft plan approval in order to ensure consistency with technical design drawings, such as site servicing and detailed site grading plans. In doing so, opportunities to retain existing trees can be identified where grading/servicing allows, while any areas that require clearing can be evaluated for replanting/enhancement opportunities, where appropriate. This is consistent with pre-consultation comments received from the Town's Development Engineering Services Department and would be required through a condition of draft plan approval.

2. *Environmental Impact Study – Response to Recommendation 5.*

Comment: Attached are response letters from the Consulting Engineer and Environmental Consultant of record addressing this comment. Per the attached letters, a Water Balance Study is not required, and the recommendation may be deemed to be appropriately addressed.

3. *Various Easements in Favour of the Subject Lands over the adjacent condominium.*

Response: The easements anticipated for the proposed development are outlined in the attached letter prepared by Robson Carpenter LLP. Easements for access and servicing are to be established as a condition of draft plan approval, as outlined in the attached letter, and will include appropriate Cost Sharing Agreements with the adjacent condominium corporation.

The applicant has contacted the Board of Directors of GCP 105 regarding the proposed development and future easements, per Town Planning Staff's request. Any correspondence received in response will be provided to the Town on receipt. Notwithstanding, it is submitted that the applications should now be deemed complete as, at minimum, the public zoning by-law amendment process otherwise provides an opportunity for public comment and feedback to inform the review of the proposed development and associated draft plan.

4. *Note that additional materials were requested through the pre-consultation process to be included with the subject applications which on submission would address a number of the related issues. These materials include: Stormwater Management Report, Landscape Plan, Site Grading.*

Response: The current proposal includes a Draft Plan of Vacant Condominium which requires full review and approval through Section 51 of the *Planning Act*. This process includes draft plan approval and the application of conditions of draft plan approval. Pre-consultation comments

provided by Development Engineering identified that Items A-G outlined therein are required in support of Draft Plan Approval. These Items include:

a) Geotechnical Report

Comment: A Geotechnical Report, prepared by JLP Services Inc., was submitted to the Town and the County of Grey on August 1, 2023.

b) Hydrogeological report for where significant dewatering is anticipated and/or deemed warranted through geotechnical investigation, or where groundwater mounding, effective stress/slope stability may be impacted by flows, or seepage rates are germane, (SWM Pond, infiltration trench, downstream pond berm/dam).

Comment: As outlined in the Pre-Consultation Comment Response Matrix, dewatering is not expected to be required.

c) Slope Stability Analysis, if in proximity to slope.

Comment: The lands are not in proximity to a slope warranting a slope stability analysis.

d) Functional Servicing Report (FSR) - demonstrating how the site can be adequately serviced, including: water and wastewater treatment plant capacity, ability of existing infrastructure to meet water demands/sewage flows, fire flow calculations, water system analysis, sewer design sheets, utilities, solid waste management (garbage/recycling), mail delivery, snow storage, etc.

Comment: A Functional Servicing Report, prepared by Tatham Engineering, was submitted to the Town and County on August 1, 2023.

e) Stormwater Management (SWM) report - confirming how stormwater quality and quantity will be achieved in accordance with MECP guidelines and with consideration of in channel erosive hours/thresholds. If existing conditions include flooding in watershed downstream of the site, a downstream analysis is also required to characterize the flooding and verify the proposed development stormwater management system will not exacerbate (increase the frequency, depth or duration) the downstream flooding.

Comment: Stormwater Management is included in the Functional Servicing Report, prepared by Tatham Engineering, as submitted to the Town and County on August 1, 2023. The Response Letter attached as Attachment 1 provides further commentary regarding stormwater management for the proposed development.

f) Traffic Analysis - addressing whether the proposed development will adversely affect the operations or the safety of adjacent roads, compatibility with adjacent development(s), suitability of proposed internal road/entrance layout and

geometrics, entrance distance from other intersections to Town Engineering Standards, parking requirements and accessible parking spaces, building set back from road/entrances to allow for adequate motorist sight lines, and projected impact of proposed development on level of service on local roads (A to F) etc.

Comment: A Traffic Impact Brief, prepared by Tatham Engineering, was submitted to the Town and County on August 1, 2023.

- g) Comment Response Matrix - to identify how comments herein and from others have been/will be addressed.

Comment: A Comment Response Matrix, including response to all comments provided by Development Engineering, was submitted to the Town on August 1, 2023, as an attachment to the Planning Justification Report.

Items H-K, which include detailed technical drawings such as site grading and landscape plans, will be submitted for drawing approval (i.e. detailed design) and for a development agreement following draft plan approval in accordance with Development Engineering pre-consultation comments.

Requested Materials

1. ***Please provide additional information to support statements that appear within the Planning Justification Report demonstrating compliance with Local Official Plan policies with regard to:***
 - a. ***Town Official Plan Policy D4.3 Subdivision Development Policies***
 - ***“e) all development by plan of subdivision shall be consistent with Section D5 of this Plan.” Please note the following policies of section D5 and provide supporting materials and/or information to demonstrate fulfillment of the policy content:***
 - i. ***D5.2 Design Policies***
 - “The community design Policies of this Plan are to be implemented by:***
 - b) ensuring that the design guidelines contained in the Blue Mountains Community Design Guidelines are consulted as a guidance tool;***
 - f) utilizing architectural control in new development areas, where appropriate, to detail proposed building designs and materials, and in order to avoid repetitive building forms along residential subdivision streets.***
 - All development applications shall be evaluated to determine the extent to which the application respects the Community Design policies of this Plan and the relevant Council adopted Community Design Guidelines.***

Response: See responses below regarding the Town of the Blue Mountains Community Design Guidelines.

b. Community Design Guidelines

As set out in the pre-consultation notes, dated April 7, 2022, submission requirements included:

Section 4. of the Community Design Guidelines, entitled ‘Greenfield Design’, shall be consulted in the design of the proposed development, including Section 4.5.1 entitled ‘Single Detached Dwellings’.

Insufficiently detailed materials have been provided to demonstrate that the guidelines have been consulted in accordance with the Town’s request. Please provide additional materials that support the statements made in the Planning Justification Report.

While an Urban Design Brief and Architectural Control Guidelines were not cited as application requirements during pre-consultation, these documents would address the related matters and are requested as a preferred response for review of the proposed zoning to identify any required Zoning By-law provisions and also given possible pre-sales permitted upon draft approval unless a no pre-sales clause is agreed to.

Response: The *Community Design Guidelines* are intended to provide urban and architectural design guidance for the (re)development of land and to encourage and promote high-quality built form in the Town. The guidelines are intended to be flexible in their application and are not intended to be a “checklist” nor to stymie creativity in design, but instead are to be applied on a case-by-case basis depending on the specific context and nature of the proposed development or building (Part 1.1 and Part 1.3 of the *Community Design Guidelines*).

The most pertinent guidelines to the proposed development are found in Part 4, entitled *Greenfield Design*, and more specifically, Part 4.5.1, entitled *Single Detached Dwellings*. The *Greenfield Design* guidelines promote high-quality urban design within new neighbourhoods including providing for attractive and connected street networks and the incorporation of existing natural features into development plans. Part 4.5.1 provides further design guidance for individual dwelling units with respect to architectural design and building siting. The intent of these guidelines is to promote high-quality architectural styles that compliment the character of the Town and create appealing streetscapes with limited repetition in individual dwelling unit designs.

In consideration of the *Community Design Guidelines*, the proposed development will achieve the desired goal of providing for a high-quality, visually pleasing streetscape and architectural design. More specifically, residential development at the Georgian Bay Club has historically been subject to restrictive covenants related to architectural control that have implemented the overall vision of creating an exclusive, high-quality custom home golf course community. These architectural control guidelines have facilitated the use of a consistent palette of natural building materials, such as natural stone, wood siding, timber framing, large windows, and

varying rooflines, to create an affinity for and connection between individual dwelling units and the surrounding natural landscape. While providing general design parameters, the historical covenants also encourage individual design and expression resulting in complimentary and varying dwelling designs. In addition to architectural design, various guidelines for siting and lot design have resulted in attractive and interesting streetscapes being created within these residential neighbourhoods. The resulting built form achieves, and far exceeds, that desired by the Town's *Community Design Guidelines*. Restrictive covenants may be employed for the proposed development at the applicant's discretion in order to maintain the high-level of architectural design that has been established throughout the Georgian Bay Club community.

Notwithstanding the above, the provisions of the R1-1 zone together with the proposed lot fabric provides flexibility in the siting of individual dwelling units within each unit/lot. More specifically, the size of the proposed units/lots range from 1,270 sq.m. to 2,650 sq.m., resulting in building envelopes that range in area from 720 sq.m. to 1,630 sq.m. after the R1-1 zone setbacks are applied. The sizes of the building envelopes allow for varying front yard setbacks to create visual interest and depth along the streetscape, depending on individual site characteristics and design preference of future unit owners (*Community Design Guidelines*, Part 4.5.1(e)). This flexibility also facilitates the incorporation of individual trees that may be identified for tree preservation, including any appropriate rear yard buffer to adjacent woodlots, without sterilizing or significantly impacting the viability of the building lot (*Community Design Guidelines*, Part 4.1.3(b)).

Additional *Community Design Guideline* considerations include:

- Subject to preceding comments herein, the executive nature of the future dwelling units will inherently result in varying elevations along the street and will avoid identical elevations being constructed on consecutive lots (Part 4.5.1(g)(h) of the *Community Design Guidelines*).
- The proposed right-of-way is designed to measure approximately 180m east-west from the connection with Club Drive. The *Community Design Guidelines* recommend street patterns to be designed so that development blocks are between 200m-250m to promote permeability and connectivity (Section 4.2.1 Street Network(d)(e)).
- Consistent with existing approved residential development at the Georgian Bay Club, no sidewalks are proposed within the plan of condominium. Notwithstanding, the proposed/existing road network provides for efficient, comfortable, and attractive, connections to the adjacent plan of condominium and to the Golf Course Club House via private condominium roads that are bordered by natural features, golf course lands, and high-quality residential streetscapes (Part 4). For added clarity, the internal private road network is not accessible to the general public.

- The proposed right-of-way and lot fabric were altered to incorporate an Open Space Block, as needed in accordance with technical studies completed following the pre-consultation review, and in response to pre-consultation comments from the Town and County of Grey (Section 4.1.2(a) Woodlots).
- As recommended by the Landscape Analysis, the viability of street tree plantings will be investigated through preparation of a detailed landscaping plan to be submitted as part of a future technical engineering design submission (Section 5.4 Boulevard/Planting Strip).

It is submitted that the applications for Draft Plan Approval and Zoning By-law Amendment have adequately considered the *Community Design Guidelines* in the design of the proposed development, as appropriate and applicable to the locational context and nature of the subject development.

c. Other – Please provide:

- ***Confirmation of proposed mechanisms for securing on lot buffer lands in the event the 3.0m on lot buffer is determined to be viable and any tree retention, mitigation, enhancement provisions within or around the proposed development area; and***

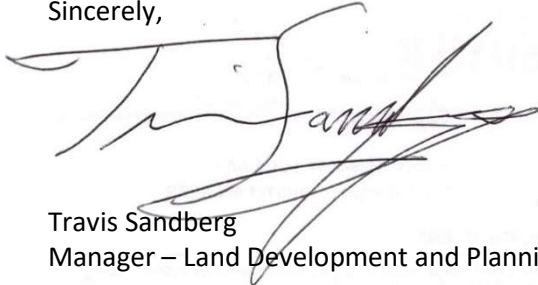
Response: Any areas or individual trees that are determined to be viable for tree preservation will be identified in a detailed tree preservation plan submitted as part of a future technical engineering design submission. Ultimately, the tree preservation plan will form part of the *Accepted for Construction* drawing package and will be subject to a Development Agreement. Once included in the development agreement the removal of trees identified on the approved plan would fall under the authority of the Town's Tree Preservation By-law 2010-68 (see Section 2(a), By-law 2010-68). Any violations reported to the Town by future residents, or the condominium board, would accordingly be subject to applicable fines or penalties as may apply under the By-law. Appropriate clauses will be included in future Purchase and Sale Agreements and Condominium Documents to notify purchasers/unit owners of any approved tree preservation areas and of the Town's Tree Preservation By-law.

- ***Preliminary trail design details for purposes of establishing construction costs for property frontage trail and assessing impact on vegetation within the ROW that could impact buffering of lots and inform any required on and/or off lot mitigation efforts.***

Response: As no trail requirement was identified through the pre-consultation process, the need and design standard for any municipal trail within the 7th Line road allowance will be confirmed through the draft plan and/or technical review process. A construction cost estimate and standard design detail in accordance with the Town of Blue Mountains Trail Development Standards can be included in a future technical engineering design submission, as may be determined necessary.

We trust that the applications may now be deemed complete and undergo formal review, with the expectation that further information or clarification may be required as a result of any further comments received through the public review process.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Travis Sandberg', with a stylized flourish extending from the end.

Travis Sandberg
Manager – Land Development and Planning

Cc: Larry Dunn, President, Dunn Capital Corporation
Colin Travis, Travis and Associates
Shawn Postma, Manager of Community Planning (Town of The Blue Mountains)
Scott Taylor, Director of Planning (County of Grey)
Stephanie Lacey-Avon, Senior Planner (County of Grey)

Attachments:

1. Landscape Analysis, prepared by Envision Tatham, dated September 1, 2023;
2. Cambium Response Letter RE: EIS Recommendation 5, dated October 11, 2023, including Tatham Response to Stormwater Management Comments; and
3. Easement Letter, Robson Carpenter LLP, dated October 24, 2023.