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Community  
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## Revised Planning Justification Report (January 2026) - Zoning By-law Amendment Application 1386 Irwin Road, Township of Douro-Dummer

### Introduction

This **REVISED** Planning Justification Report (PJR) has been prepared in support of a Zoning By-law Amendment (ZBLA) Application filed with the Township of Douro-Dummer Planning Department, regarding the residential waterfront property known municipally as 1386 Irwin Road. The original PJR was prepared in December 2025.

### The Property



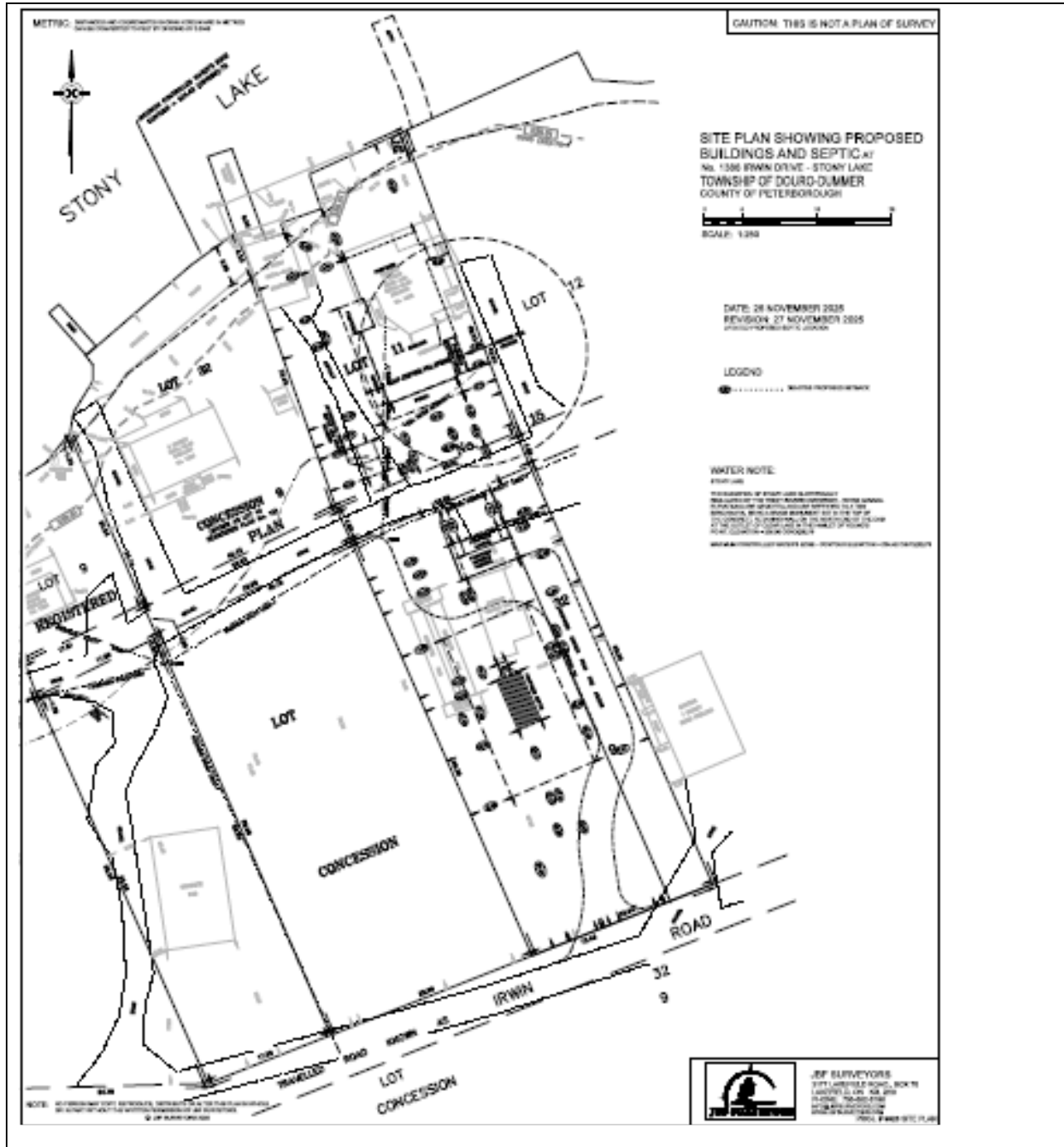
The Property

(Source: County of Peterborough GIS Website, December 2025)

The property is located on the north side of Irwin Road, in an area of developed waterfront residential properties.

## The Concept Plan

The ZBLA Application seeks to permit the replacement of the existing dwelling with a new dwelling. All other building features will remain in place (land based and in-water).



(Source: JBF Surveyors, December, 2025)

## Development Summary

<p><u>EXISTING 1386 SITE INFORMATION:</u> TOTAL LOT AREA; 2,776,758m<sup>2</sup> (29,888 ft<sup>2</sup>)</p> <p>EXISTING BUILDING FOOTPRINT: 140,306m<sup>2</sup> (1,510 ft<sup>2</sup>) BUILDING LOT COVERAGE; 5%</p> <p>EXISTING GROSS AREA: ~337.74m<sup>2</sup> (3635.41 ft<sup>2</sup>)</p> <p><u>ZONING:</u> MIN. WATER YARD: 30m MIN. INTERIOR SIDE YARD; 6m REAR YARD; 15m MAX LOT COVERAGE: 15% ACCESSORY BUILDING LOT COVERAGE: 5% MAX BUILDING HEIGHT; 9m</p>	<p><u>PROPOSED 1386 SITE INFORMATION:</u> TOTAL LOT AREA; 2,776,758m<sup>2</sup> (29,888 ft<sup>2</sup>)</p> <p>PROPOSED CANTINA FOOTPRINT: 210,007m<sup>2</sup> (2,260 ft<sup>2</sup>) PROPOSED CANTINA COVERED PORCH; 64,284m<sup>2</sup> (692 ft<sup>2</sup>) TOTAL: 274,291m<sup>2</sup> (2,953 ft<sup>2</sup>) BUILDING LOT COVERAGE; 10%</p> <p>PROPOSED GARBAGE SHED: 36.78m<sup>2</sup> (396 ft<sup>2</sup>) PERCENTAGE PROPOSED LOT COVERAGE; 1%</p> <p><u>PROPOSED CANTINA HOUSE INFORMATION</u> GROSS AREA (INC. BASEMENT); 406,45m<sup>2</sup> (4,375 ft<sup>2</sup>) BASEMENT AREA: 105.27m<sup>2</sup> (1133 ft<sup>2</sup>) BUILDING HEIGHT FROM AVERAGE GRADE; 10.48m</p> <p><u>ZONING:</u> MIN. WATER YARD: 30m MIN. INTERIOR SIDE YARD; 6m REAR YARD: 15m MAX LOT COVERAGE: 15% ACCESSORY BUILDING LOT COVERAGE: 5% MAX BUILDING HEIGHT; 9m</p>
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## PJR Revisions

There are two minor revisions made to the original PJR, summarized as follows:

- A revision to the overall building coverage of the lot by the principal dwelling and accessory dwelling to 18.41%. The coverage now includes a section of decking feature of an accessory structure as building coverage.
- The coverage is calculated as follows:
  1. Principal Dwelling – 9.88% (complies with the Zoning By-law); and
  2. Accessory Building – 8.53%
- Building setback – Principal Dwelling from the waterbody – 7.5 metres. The original PJR referenced a setback dimension of 6.632 metres.

## The REVSIED Proposed Zoning By-law Amendment (ZBLA) Application

It is proposed that the current SD-219 (Special District – 219) zoning of the proposed be amended as follows:

**A. Permitted Uses** – as per the current SD-219 zone.

## **B. Regulations**

### **i) 21.219.2 Special Provisions (Main Dwelling)**

- 1.The minimum water-yard for a dwelling shall be **7.5 metres**, as per the development plan attached to this By-law, referenced as Schedule 'B'.
- 2.The minimum east side yard (side lot line shall be 2.65 metres, as per the development plan attached to this By-law, referenced as Schedule 'B'.
- 3.Overhang projections (Main dwelling) shall be greater than 0.61 metres , as per the development plan attached to this By-law, referenced as Schedule 'B'.
- 4.Notwithstanding the provisions of Section 7.2.1(l), the maximum building height – (main dwelling) shall be 10.48 metres.
- 5.The minimum building setback (main dwelling) from a private Right-of-Way shall be 9.8 metres (south), as per the development plan attached to this By-law, referenced as Schedule 'B'.

### **Accessory Building**

The minimum building setback (accessory structure- garage) from a private Right-of-Way shall be 4.3 metres (north), as per the development plan attached to this By-law, referenced as Schedule 'B'.

### **Building Coverage**

**ii)The total maximum building coverage (principal dwelling and the accessory building) shall be 18.41%.**

**ii) 21.219.2 Special Provisions (Boathouse)** to be added, if required, to recognize the existing west side yard

The minimum water-yard for a boathouse, located within the north-west part of the property, shall be as per the development plan attached to this By-law, referenced as Schedule 'B'. Further, notwithstanding the provisions of Section – 3.1.5, a boathouse shall have a minimum west side yard of 0 metres.

These proposed amendments are required to permit the proposed new dwelling and associated accessory structure (garage) and to recognize the configuration/location of the existing boathouse. It is noted that the water-yard setback of the proposed dwelling will not be closer to the Stony Lake shoreline than the existing dwelling.

The maximum building height (main dwelling) is otherwise 9 metres, as measured from the average grade of the waterfront side of the dwelling. A modest increase in building height is being sought in this instance.

Section 3 (General Provisions), specifically sub-section 3.28 speaks to Non-Complying Buildings or Structures. Sub-Section 3.2.8.1 speaks to Non-Complying Dwellings. For purposes of this ZBLA Application, the following is noteworthy:

- a) The enlargement, reconstruction or renovation does not further reduce such setback and or front yard and/or side yard and/or rear yard or water yard having less than the minimum required by this By-law;
- b) All other provisions of this By-law are complied with;
- c) Notwithstanding the provisions of this section, where a deficiency is in the front or water yard, any proposed enlargement or extension of a building or structure which existed at the date of passing of this by-law, shall not exceed 25 percent of the lateral dimension of the existing building or structure.

The proposed replacement dwelling will not require a reduction of the existing water-yard. Additionally, the lateral dimension of the proposed replacement dwelling is less than the maximum permitted 25% increase:

**Existing Width: 12.2 metres**

**Proposed Width: 14.1 metres**

The lateral dimension measurement is in keeping with the regulatory provisions of Sub-Section 3.28 of the Zoning By-law.

The existing boathouse will remain unchanged (configuration/location).

The property owner commissioned a building condition report which confirmed the inability of the existing dwelling for expansion/redevelopment purposes.

**In summary, it is my professional planning opinion that the ZBLA Application is appropriate and based upon the current SD-219 zone, is in Keeping with the general purpose and intent of the Township Zoning By-law.**

**Pre-Consultation**

The ZBLA Application was subject of a Pre-Consultation – April 24, 2025 (See Attachment 'G' to this Report). The original concept development plan was modified, as reflected in the Concept Plans contained in Attachment 'E' to this Report.

The Pre-Consultation identified the requirement for specific background/technical Reports, all of which have been prepared in support of the concerned ZBLA Application.

**1. Landscaped Plan – JRS Landscape Architecture and Urban Design**

A Landscape Plan has been prepared illustrating proposed removal and new planting – landscaped features.

**2. Archaeological Assessment Stage 1 - 2 – AMICK Consultants Services Inc., June 12, 2025**

The Archaeological Assessment Stage 1 -2 Report did not identify any archaeological resources – attributes.

**3. Structural Assessment Report**

Structural Assessment Reports were prepared for both the existing dwelling and boathouse buildings, by Cambium Inc., which confirmed that the existing buildings cannot be repaired or renovated. Thus, a demolition of the existing dwelling can proceed.

**4. Environmental Impact Study – Sumac Environmental, November 2025**

The EIS Report did not identify any environmental concerns as it pertains to the redevelopment of the property. Section 8.2 of the Report sets forth a series of Recommendations, which will be addressed through the redevelopment of the property, including the demolition and building permit processes.

Copies of the aforementioned Reports and Plans are included as part of this PJR/ZBLA Application, as filed with the Township.

**Analysis**

**2024 Provincial Planning Statement (2024 PPS)**

Relative to the ZBLA Application, the following policies of the 2024 PPS are considered to have direct relevancy:

<b>Policy</b>	<b>Title, Details, Planning Opinion</b>
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2.3	Settlement Areas and Settlement Area Boundary Expansions
2.3.1	<p>General Policies for Settlement Areas</p> <p>1. Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.</p> <p><b>Opinion: The property does not form part of a designated settlement area.</b></p>
2.5	<p>Rural Areas in Municipalities</p> <p>1. Health, integrated and viable <i>rural areas</i> should be supported by:</p> <ul style="list-style-type: none"> <li>a) building upon rural character, and leveraging rural amenities and assets;</li> <li>d) using rural <i>infrastructure</i> and <i>public service facilities</i> efficiently;</li> <li>g) conserving biodiversity and considering the ecological benefits provided by nature;</li> </ul> <p><b>Opinion: The ZBLA Application seeks to permit the appropriate redevelopment of the property (replacement dwelling and new waste-water facility), considerate of its setting and relationship with the built environment, as well as area natural and shoreline assets.</b></p>
	<p>2. In rural areas, rural settlement areas shall be the focus of growth and development and their vitality and regeneration shall be promoted.</p> <p><b>Opinion: The property does not form part of a designated rural settlement area.</b></p>
2.6	<p>Rural Lands in Municipalities</p> <p>1. On rural lands located in municipalities, permitted uses are:</p> <ul style="list-style-type: none"> <li>b) resource-based recreational uses (including recreational dwellings not intended as permanent residences);</li> </ul>

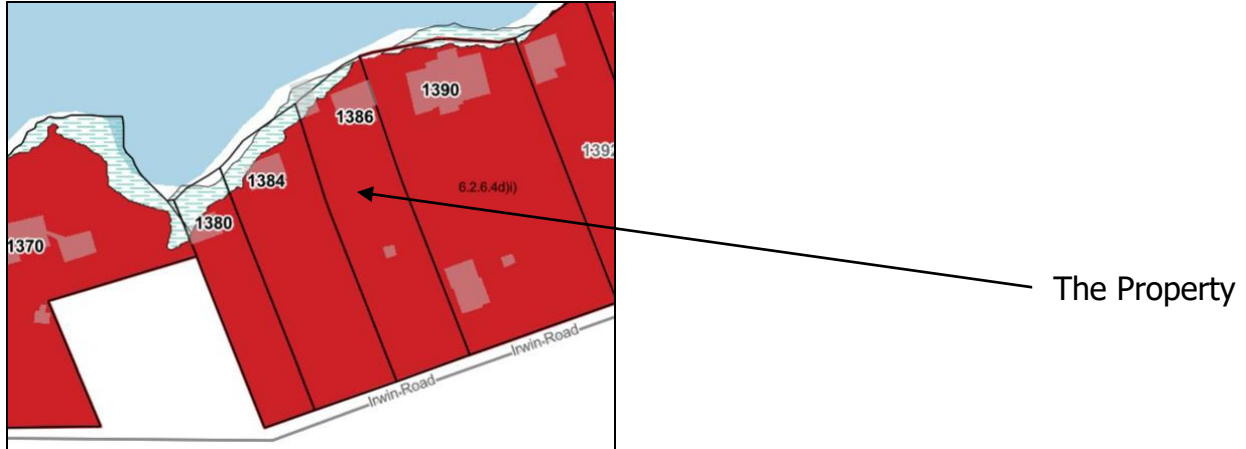
	<p>c) residential development, including lot creation, where site conditions are suitable for the provision of appropriate sewage and water services;</p> <p><b>Opinion: A replacement dwelling and new waste-water facility (septic) are proposed on a property enjoying a resource-based setting.</b></p>
	<p>2. Development that can be sustained by rural service levels should be promoted.</p> <p><b>Opinion: The property is currently developed and located in an area of several similar waterfront residential properties, which are sustained by rural service levels. The same scenario will apply, post redevelopment.</b></p>
3.6	<p>Sewage, Water and Stormwater</p> <p>4. Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts.</p> <p><b>Opinion: The property will continue to rely upon private water and waste-water services. This is commonplace for all area residential properties. A new septic facility is proposed to accommodate the new residential building.</b></p>
4.1	<p>7. Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.</p> <p><b>Opinion: The Sumac EIS Report did not identify any species-at-risk issues associated with the proposed redevelopment of the property.</b></p>

**In summary, it is my Professional Planning Opinion that the Zoning By-law Amendment Application demonstrates Consistency with the policy directives of the 2024 Provincial Planning Statement.**

## County of Peterborough Official Plan (COP)

For purposes of this PJR, I employed the Pre-July 2022 version of the County of Peterborough Official Plan (COP). The property and the surrounding waterfront residential properties are designated as “Lakeshore Residential”.

### Official Plan Map Detail



(Source: County of Peterborough Website, December 2025)

Relative to the ZBLA Application, the following policies of the COP are considered to have direct relevancy:

Policy	Title, Details, Planning Opinion
4.1	<p>Natural Environment</p> <p>The County recognizes the important contribution that natural systems, natural heritage features and natural resources make to the social, economic, and environmental health of local municipalities. In this regard, the County has identified the following areas to ensure that the appropriate land use and resource management protection policies are applied to them.</p> <p><b>Opinion: The Sumac Environmental EIS Report confirmed that the proposed redevelopment of the property will not create an impact upon natural features, including the adjacent waterbody.</b></p>
4.4	<p>Shoreland Areas and the Waterfront</p> <p>Shoreland Areas generally include all lands extending inland 150 metres from the ordinary high water mark of, any lake, river or waterway. Lands and land uses that are more than 150 metres from shore but which physically or functionally relate to the Shoreland Areas are</p>

	<p>considered to be part of the Shoreland Areas. All lands that are less than 150 metres from shore but which do not physically or functionally relate to the Shoreland Areas are not considered to be part of the Shoreland Areas. The entire areas of islands are normally considered to be part of the Shoreland Areas.</p> <p><b>Opinion: The property enjoys a waterfront setting on the south part of the Stony Lake shoreline.</b></p>
4.4.1	<p>Goal</p> <ul style="list-style-type: none"> <li>• to improve and protect the waterfront areas in Peterborough County as a significant cultural, recreational, economic and natural environment resource and enhance land areas adjacent to the shore.</li> </ul> <p><b>Opinion: The proposed redevelopment of the property will not detract from the area natural environment – context, as per the Sumac Environmental EIS Report.</b></p>
4.4.2	<p>Objectives</p> <ul style="list-style-type: none"> <li>• to permit sustainable shoreland development that allows for limited growth of existing and new tourist developments and innovatively designed residential developments;</li> <li>• to ensure that the built form along the shoreline is not overly concentrated or dominating to the detriment of the natural form;</li> </ul> <p><b>Opinion: The property is currently developed for waterfront residential purposes (former dwelling of the Irwin Inn). The proposed redevelopment scheme is respectful of the property’s relationship with the adjacent waterbody. Moreover, the redevelopment is not an over-concentration of built form.</b></p>
4.4.3	<p>Policies</p> <ul style="list-style-type: none"> <li>• The character of Shoreland Areas is linked to the natural and built form associated with the lakes and rivers in the County. For the most part, the natural form includes vegetated shorelines with thin soils over bedrock. The built form includes predominantly residential development interspersed with some commercial developments including resorts and marinas. The Shoreland Areas are generally associated with leisure, recreation, water supply, support for fisheries and wildlife habitat. As such, development occurring in the Shoreland Areas should enhance and protect, where possible, those qualities that</li> </ul>

	<p>contribute to the area’s character;</p> <p><b>Opinion: The proposed redevelopment of the property demonstrates conformity with the policy provisions of Section 4.4.2.</b></p> <p><b>The limited development associated with the replacement dwelling, together with the general natural setting, as per the Sumac EIS Report recommendations will ensure a responsible and appropriate redevelopment form and approach.</b></p>
6.2.6	Lakeshore Residential
6.2.6.1	<p>General Principles</p> <p>Permanent single-detached dwellings and cottages in shoreline areas along publicly maintained roads are the predominant use of land within the Lakeshore Residential designation. However in the Township of Douro-Dummer, permanent single-detached dwellings and seasonal cottages may also be permitted on private roads and deeded right-of-ways subject to the provisions of the Township’s Zoning By-Law. This designation provides for the conversion of seasonal cottages to permanent dwellings by amendment to the Zoning By-law, where necessary. For the purposes of this plan, the terms “cottage” and “seasonal residence” are used interchangeably.</p>
6.2.6.2	<p>Permitted Uses</p> <p>The predominant use of land within the Lakeshore Residential designation shall be for permanent single-detached dwellings and seasonal cottages on public roads. This category may include retail and service commercial uses of limited extent which provide primarily for the day-to-day commercial needs of the lakeshore residents.</p> <p><b>Opinion: The property is currently developed/used for residential purposes. The redevelopment scheme incorporates a replacement dwelling to be located in the area of the existing dwelling.</b></p>
6.2.6.3	<p>Lakeshore Residential Policies</p> <p>a) The intent of this category is to make provision for permanent single detached dwellings and seasonal cottages based on public road access. This designation also provides policies to guide the conversion of seasonal cottages to permanent dwellings by amendment to the Zoning</p>

	<p>By-law, where necessary.</p> <p>b) The Township shall have regard to the following when considering an amendment to the Zoning By-law to permit a conversion:</p> <p>i) The lot shall be adequately served by a year-round publicly-maintained road. No conversions shall be permitted on private roads unless otherwise permitted in this plan.</p> <p>ii) The lot shall have adequate frontage and area as set out in the implementing Zoning By-law.</p> <p>iii) The cottage has an adequate source of potable water supply whose year round use will not impair the supply of other nearby buildings and land uses and will satisfy the requirements of the Health Unit and/or the Ministry of the Environment.</p> <p><b>Opinion: The property (replacement dwelling) can be appropriately served by private water (drilled well) and the new waste-water (septic) facilities.</b></p> <p>v) The cottage has a sanitary sewage disposal system suitable for year round operation and will satisfy the requirements of the Health Unit and/or the Ministry of the Environment</p> <p><b>Opinion: The existing cottage/dwelling warrants replacement, as per the Structural Assessment Report. The proposed new dwelling is to be located in the same area of the existing cottage/dwelling.</b></p> <p><b>It is noted that the water-yard setback is less than the standard 30 metres requirement. The water-yard setback has not been decreased by way of the proposed replacement dwelling.</b></p> <p><b>The replacement dwelling respects the existing water-yard setback and represents a minimal disturbance to the property (only as it would relate to construction requirements).</b></p>
	<p>Permitted Exceptions</p> <p>Notwithstanding anything in this section to the contrary, structures such as pump houses, boat houses, docks, open decks and stairs shall be a permitted use and may encroach into the 30 metre setback without a minor variance provided that the property owner can demonstrate to the Township's satisfaction and, if appropriate, the authority having jurisdiction over the waterway, that it does not negatively affect the</p>

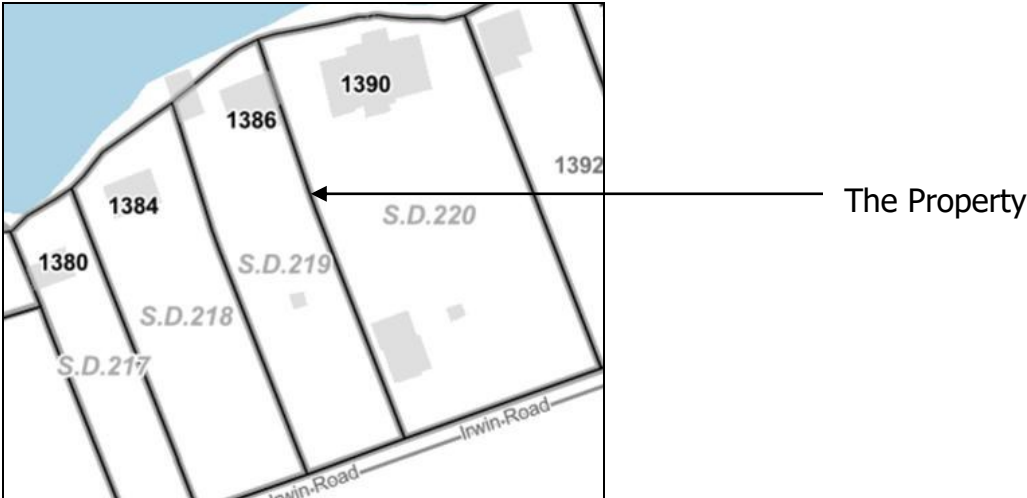
	<p>waterfront environment. If addressed in the Zoning By-law, applicable standards must be met (i.e. deck width, area, etc.).</p> <p><b>Opinion: The existing dwelling structure is non-conforming in terms of its setback from the Shoreline of Stony Lake. The proposed replacement dwelling respects this water-yard setback context. A By-law Exception is proposed to recognize the “new” water-yard setback.</b></p>
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**In summary, it is my Professional Planning Opinion that the Zoning By-law Amendment Application is in keeping with the policies of the Lakeshore Residential designation of the County Official Plan, including relevant policies of the Lower Tier (Township of Douro-Dummer), respectively.**

**Township of Douro-Dummer Zoning By-law (TZBL)**

The property is zoned SD-219 – Special Designation 219.

**Zoning Map Detail**



(Source: County of Peterborough Website, December 2025)

The SD-219 zone permits residential uses, both seasonal and permanent types. The zone is essentially a “modification” of the standard Limited Service Residential zone. It is noted that the minimum water-yard regulatory requirement (Regulation 7.2 (h)) is 15 metres.

## **The Proposed Zoning By-law Amendment (ZBLA) Application**

It is proposed that the current SD-219 (Special District – 219 - H) zoning of the proposed be amended as follows:

**A. Permitted Uses** – as per the current SD-219 zone.

### **B. Regulations**

#### **i) 21.219.2 Special Provisions (Main Dwelling)**

The minimum water-yard for a dwelling shall be **7.5 metres**, as per the development plan attached to this By-law, referenced as Schedule 'B'.

The minimum east side yard (side lot line) shall be 2.65 metres, as per the development plan attached to this By-law, referenced as Schedule 'B'.

Overhang projections (Main dwelling) shall be greater than 0.61 metres , as per the development plan attached to this By-law, referenced as Schedule 'B'.

Notwithstanding the provisions of Section 7.2.1(l), the maximum building height – main dwelling shall be 10.48 metres.

The minimum building setback (main dwelling) from a private Right-of-Way shall be 9.8 metres (south), as per the development plan attached to this By-law, referenced as Schedule 'B'.

The maximum building height (main dwelling) is otherwise 9 metres, as measured from the average grade of the waterfront side of the dwelling. A modest increase in building height is being sought in this instance.

#### **Accessory Building**

The minimum building setback (accessory structure- garage) from a private Right-of-Way shall be 4.3 metres (north), as per the development plan attached to this By-law, referenced as Schedule 'B'.

#### **Building Coverage**

**ii)The total maximum building coverage (principal dwelling and the accessory building) shall be 18.41%.**

**ii) 21.219.2 Special Provisions (Boathouse)** to be added, if required, to recognize the existing west side yard.

The proposed amendments are required to permit the proposed new dwelling and to recognize the configuration/location of the existing boathouse. It is noted that the water-yard setback of the proposed dwelling will not be closer to the Stony Lake shoreline than the existing dwelling.

Section 3 (General Provisions), specifically sub-section 3.28 speaks to Non-Complying Buildings or Structures. Sub-Section 3.2.8.1 speaks to Non-Complying Dwellings. For purposes of this ZBLA Application, the following is noteworthy:

- a) The enlargement, reconstruction or renovation does not further reduce such setback and or front yard and/or side yard and/or rear yard or water yard having less than the minimum required by this By-law;
- b) All other provisions of this By-law are complied with;
- c) Notwithstanding the provisions of this section, where a deficiency is in the front or water yard, any proposed enlargement or extension of a building or structure which existed at the date of passing of this by-law, shall not exceed 25 percent of the lateral dimension of the existing building or structure.

The proposed replacement dwelling will not require a reduction of the existing water-yard. Additionally, the lateral dimension of the proposed replacement dwelling is less than the maximum permitted 25% increase:

**Existing Width: 12.2 metres**

**Proposed Width: 14.1 metres**

The lateral dimension measurement is in keeping with the regulatory provisions of Sub-Section 3.28 of the Zoning By-law.

The existing boathouse will remain unchanged (configuration/location).

The property owner commissioned a building condition report which confirmed the inability of the existing dwelling for expansion/redevelopment purposes.

**In summary, it is my professional planning opinion that the ZBLA Application is appropriate and based upon the current SD-219-H zone, is in Keeping with the general purpose and intent of the Township Zoning By-law.**

## **Property Re-Development**

The redevelopment of the property will adhere to the recommendations outlined in Section 8.2 of the November 2025 Sumac EIS Report.

Additionally, the redevelopment of the property will be governed by the Building Permit and associated building construction process (both demolition and new construction).

## **Summary**

### **It is my Professional Planning Opinion that the REVISED Zoning By-law Amendment Application is:**

- In Conformity with the policy directives of the 2024 Provincial Planning Statement;
- In Keeping with the general purpose and intent of the policies and land use designations of the County of Peterborough Official Plan (July 2022 Version);
- In Keeping with the general purpose and intent of the regulatory provisions of the Township of Douro-Dummer Zoning By-law;
- Supported by the following Reports:
  - i. Archaeological Assessment, Stage 1 – 2 Report;
  - ii. Structural Assessment Reports (Boathouse and Dwelling); and
  - iii. Environmental Impact Study.
- **Is Representative of Good Planning.**

Respectfully Submitted,



Kevin M. Duguay, MCIP, RPP