



# CONSILIO

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## 1.0 INTRODUCTION

Consilio Planning has been retained by Kayla Gallant and Jean-Christophe Gallant to prepare this Planning Rationale Report in support of a proposed Zoning By-law Amendment for the property located in Clarence-Rockland.

The current application reflects the evolution of a proposal that was originally presented at a public meeting held in July 2025. At that time, the United Counties of Prescott and Russell (UCPR) requested that an Environmental Impact Statement (EIS) and an Aggregate Resource Impact Assessment be prepared and submitted in support of the Zoning By-law Amendment application. In response to this direction, further technical work was undertaken, and the project has since been refined.

As currently proposed, the development has been scaled to a reduced footprint, consisting of the construction and installation of ten (10) cabin units (max size of the cabins 16x16), thereby minimizing potential impacts and ensuring a low-intensity form of development that is sensitive to the surrounding natural environment.

The subject property is designated “Rural Policy Area” in the UCPR Official Plan and is located just outside the eastern boundary of the Rockland settlement area. The property is currently zoned “Rural (RU)” under the City of Clarence-Rockland Zoning By-law.

The intent of the application is to permit the proposed development, a privately owned and operated, all-season facility designed to offer a unique short-term accommodation experience.

The proposed accommodations will consist of 10 small-scale cabin units (including and/or repurposed containers), thoughtfully integrated within the natural landscape. These units are intended for short-term stays and will not be individually owned or leased.

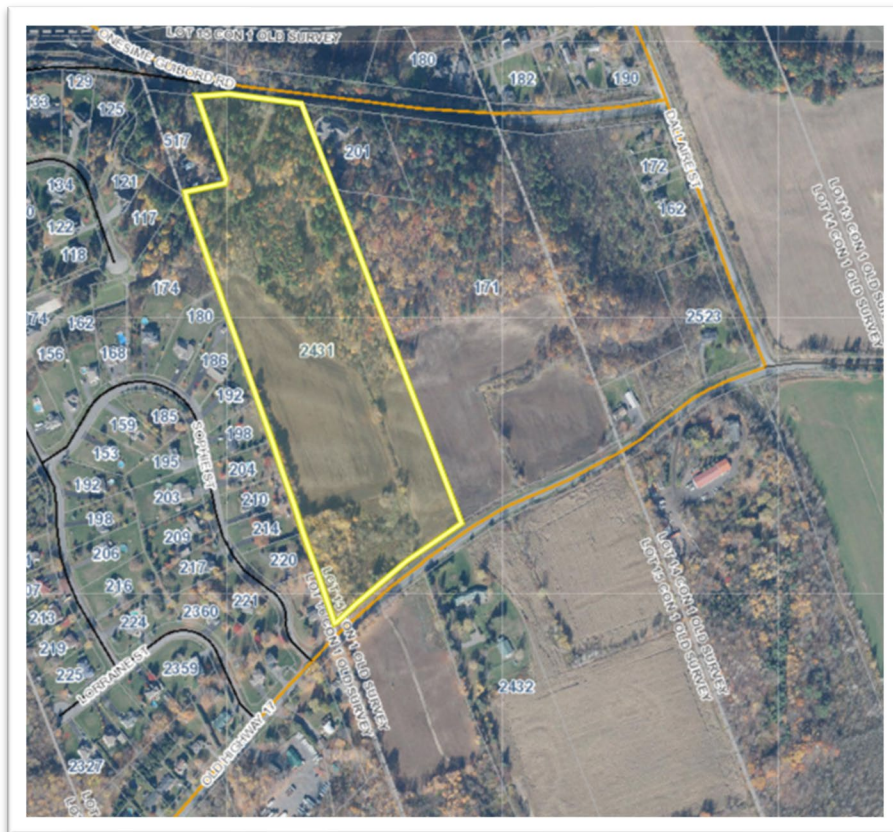
To facilitate the proposed development, a Zoning By-law Amendment is required, as the current “Rural (RU)” zoning does not permit the intended use. The proposed amendment seeks to rezone the property to a site-specific “Tourist Commercial – Exception (CT-Exception)” Zone to permit short-term accommodation units.

An Official Plan Amendment is not required. The proposed development is consistent with the intent of the Rural designation, which permits low-impact, tourism-oriented and recreational uses that support rural economic activity while maintaining the natural character of the area.

## 2.0 SITE LOCATION AND CONTEXT

The subject property is located on Old Highway 17. According to the United Counties of Prescott and Russell's "À la Carte" GIS system, a stream runs along the entire western boundary of the property. Additionally, a groundwater recharge area has been identified at the rear portion of the site, covering approximately 3.70 acres. The total area of the property is 25.84 acres.

Figure 1: Aerial imagery of the site and surrounding uses. (source Prescott and Russell a la carte)



The surrounding context of the subject site is compatible with the proposed use:

- **North:** The property directly abuts the Ottawa River, offering a scenic natural feature that enhances the setting and supports the nature-based focus of the development.
- **East:** The adjacent parcel to the east is currently vacant, providing a buffer and opportunity for compatible future rural or recreational uses.

- **West:** A residential subdivision lies to the west, highlighting the site's transitional location between residential and rural areas and reinforcing the importance of careful design and buffering to maintain compatibility.
- **South:** Lands to the south consist of a mix of rural residential properties and farmland, consistent with the broader rural character of the area and supportive of low-impact tourism development.

## 2.1 PROPOSED PROJECT

The proposed development, consists of the construction of 10 cabins (maximum size of 16x16) unique short-term accommodations in a rural setting. Each unit will be equipped with a bed, a barbecue, and a compostable toilet to ensure minimal environmental impact. The project is intended as a low-scale, seasonal pilot to assess viability through rental platforms such as Airbnb.

Presently the site contains:

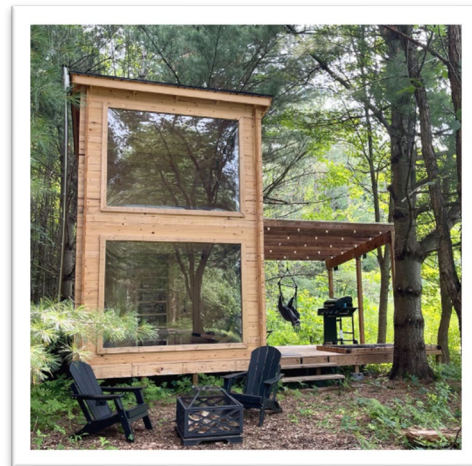
One two-storey cabin (approximately 200 sq. ft.)

One canvas tent (approximately 169 sq. ft.)

One modified shipping container home (approximately 126 sq. ft.)

Unit Features:

- Capacity: Each unit is designed to accommodate two guests
- Power: Primarily powered by solar energy
- Water: All water is brought on-site for each guest
- Cooking: Cooking is done using propane BBQs



The existing cabins are supposed to be either demolished or upgraded, as required, to ensure full compliance with the Ontario Building Code (OBC).

## **Project Evolution and Revised Development Concept**

The proposed development was originally intended to proceed in multiple phases, including a wellness resort concept with accommodation units and additional amenities.

However, following the public meeting and in response to concerns raised by the community and reviewing agencies, including the Environmental Impact Statement (EIS) requirements, the project has been significantly revised and reduced in scope.

## **Final Proposed Development (Revised)**

The project is now limited to the installation of a maximum of ten (10) cabin units only.

This includes:

- no spa component;
- no communal or main building;
- no expansion of accommodation units beyond the ten (10) cabins.

The cabins will be strategically positioned across the site to:

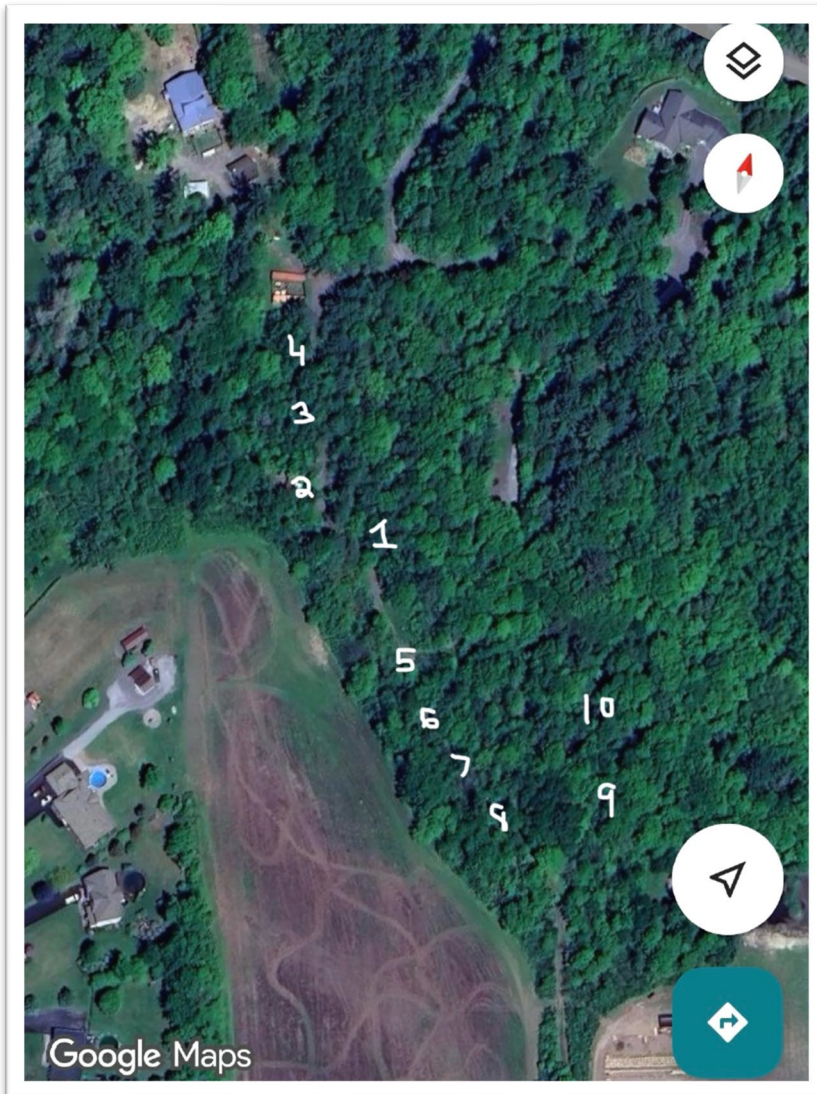
- comply with the recommendations of the Environmental Impact Statement (EIS);
- minimize vegetation removal and site disturbance;
- preserve the natural environment to the greatest extent possible; and
- maintain appropriate buffering from the adjacent residential subdivision (closest house to the closest cabin is about 130m (425 feet)).

The proposed cabins are not intended to function as dwelling units. They are designed exclusively for short-term accommodation. The units will not include full kitchen facilities.

The cabins will not be individually owned, leased on a long-term basis, or used for permanent residential purposes. The development will operate as a single, unified commercial operation.

The site plan (see below) illustrates the location of the cabins, including the retention of a buffer area between the proposed development and the existing subdivision, ensuring compatibility with surrounding uses.

Figure 1A: Represents the proposed location of the future cabins.

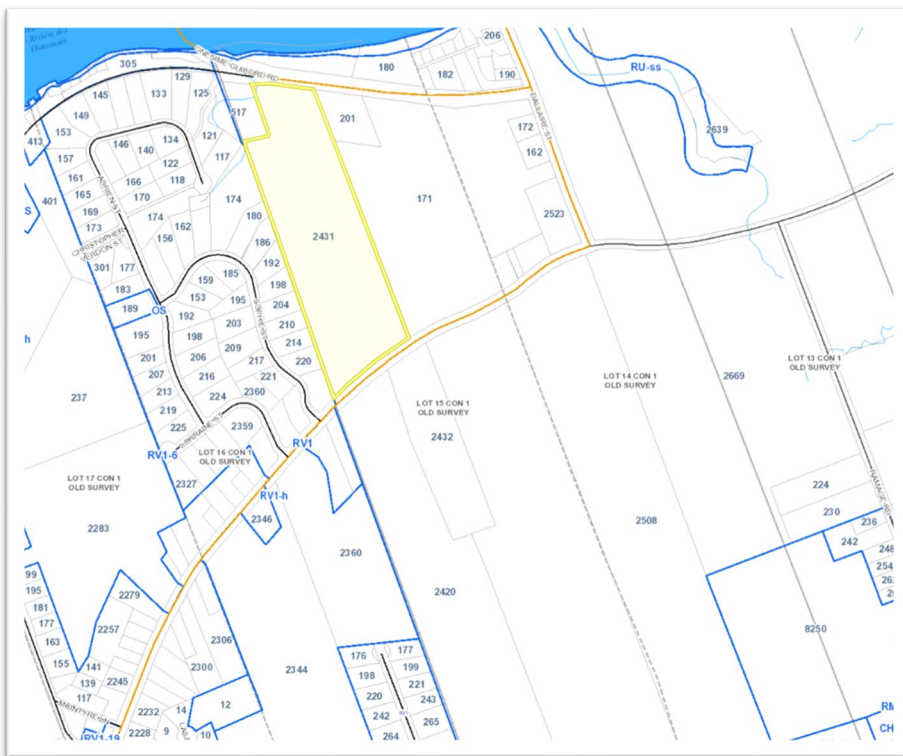


### Conclusion on Revised Approach

The revised proposal represents a low-density, low-impact development that is responsive to public feedback and environmental constraints. By eliminating future phases and limiting the project to ten (10) cabins, the proposal ensures that the development remains compatible with the rural context and respectful of the natural features of the site.



Figure 3: Zoning of the subject properties and surroundings (source: Prescott and Russell “A la carte”).



## 4.0 PLANNING POLICY FRAMEWORK

### 4.1 PROVINCIAL PLANNING STATEMENT (2024)

The proposed development, consisting of a maximum of ten (10) cabin units for short-term rental, represents a low-intensity, resource-based recreational use that is consistent with the Provincial Planning Statement (PPS). The proposal has been significantly revised in response to agency and public comments and is supported by the completion of the required technical studies, including an Environmental Impact Statement (EIS), which confirms the suitability of the site for development.

#### 1. Healthy, Liveable and Safe Communities (PPS Section 1.1.1)

The proposed development contributes to the creation of healthy, liveable and safe communities by promoting a low-density, nature-based accommodation use focused on wellness, outdoor experience, and connection with the natural environment.

The limited scale of the project (10 cabins) ensures compatibility with the surrounding rural context and avoids land use conflicts, while supporting opportunities for passive recreation and short-term accommodation in a natural setting.

## **2. Servicing (PPS Section 1.6.6)**

The proposed development will operate without reliance on conventional water or wastewater servicing infrastructure. Sanitary needs will be addressed through the use of compostable toilet systems, eliminating the need for a septic system or connection to municipal services.

The project does not require the extension of municipal infrastructure and will function independently within the existing rural context.

As such, the proposal represents an efficient and appropriate use of rural lands without creating demand for new or uneconomical servicing infrastructure.

## **3. Natural Heritage (PPS Section 2.1)**

An Environmental Impact Statement (EIS) has been prepared by qualified professionals to assess the potential impacts of the development on natural heritage features identified on and adjacent to the site.

The EIS concludes that, with the implementation of recommended mitigation measures, the proposed development will not result in significant negative impacts on natural heritage features or ecological functions.

The layout of the proposed cabins has been carefully designed to:

- minimize vegetation removal;
- avoid sensitive features; and
- maintain appropriate buffers from adjacent natural areas and watercourses.

The proposal is therefore consistent with the natural heritage policies of the PPS.

## **4. Rural Areas in Municipalities (PPS Section 2.5)**

The proposed development supports the PPS objective of maintaining healthy, integrated, and viable rural areas.

Specifically, the proposal:

- Builds on rural character by maintaining a low-density form of development that integrates with the natural landscape;
- Promotes economic diversification by introducing a small-scale tourism use that supports local economic activity;
- Supports sustainable tourism by offering short-term accommodation that relies on and respects the natural environment; and
- Uses infrastructure efficiently, relying on existing roads and private servicing.

The revised scale of the development ensures that it remains appropriate within the rural context and does not introduce urban-type intensity.

### **5. Rural Lands in Municipalities (PPS Section 2.6)**

The proposed development is consistent with the permitted uses and development approach for rural lands.

The project qualifies as a resource-based recreational use, as it relies on the natural setting to provide accommodation and nature-based experiences;

The development is appropriate in scale, limited to ten (10) cabins, and designed to function within rural service levels;

The proposal does not require major infrastructure investment, avoiding the need for municipal servicing expansion; and

The development has been designed to ensure compatibility with surrounding uses, including the provision of buffers.

### **Conclusion**

The revised proposal represents a low-impact, environmentally sensitive form of rural development that is consistent with the Provincial Planning Statement. The project supports rural economic diversification, maintains rural character, and ensures that development is compatible with environmental constraints and servicing limitations.

The reduction of the project to a maximum of ten (10) cabins directly addresses agency and public concerns and ensures that the proposal remains modest in scale, sustainable, and appropriate for the rural context.

The revised proposal demonstrates a clear alignment with the intent of the PPS by balancing economic opportunity with environmental protection and community compatibility.

## **4.2 UNITED COUNTIES OF PRESCOTT AND RUSSELL OFFICIAL PLAN**

The proposed development has been revised significantly since the initial submission in response to comments received from the United Counties of Prescott and Russell (UCPR), including the formal review letter dated July 30, 2025.

In their review, UCPR identified that the application was premature in the absence of supporting technical studies and noted that conformity with the Official Plan could not be demonstrated without proper environmental and servicing analysis. Specific requirements included the preparation of an Environmental Impact Study (EIS) and an Aggregate Impact Assessment.

In response to these comments, the application has been substantially revised and strengthened.

All required technical studies have now been completed by qualified professionals and submitted in support of the application. These studies have been reviewed by the City and its consulting engineers, and their findings have directly informed the revised development concept. The conclusions of these studies confirm that the proposed development is appropriate for the site and does not result in unacceptable impacts on natural heritage features, groundwater resources, or mineral aggregate potential.

In addition, the proposed development has been significantly reduced in scale and intensity. The original proposal, which included multiple phases and additional wellness-related amenities, has been replaced with a single-phase development limited to a maximum of ten (10) cabin units for short-term rental purposes only. All references to “tiny homes” have been removed and replaced with “cabins,” consistent with Ontario Building Code guidance and UCPR comments. The proposal now clearly identifies the units as cabins for short-term accommodation.

The proposed cabins are not self-contained dwelling units and are not intended for permanent habitation. The development is structured as a single commercial operation, consistent with Ontario Building Code guidance and provincial expectations.

### **Rural Policy Area (Section 2.7)**

The subject property is designated “Rural Policy Area” in the UCPR Official Plan.

The revised proposal conforms to the intent of this designation by introducing a low-impact, resource-based recreational use that:

- maintains the rural character and natural landscape;
- represents an appropriate form of rural economic diversification through tourism; and
- is compatible with surrounding land uses, including adjacent residential and rural lands.

The reduced scale of the development ensures that it does not introduce urban-type intensity and remains consistent with the policy direction to support appropriate, small-scale non-residential uses in the rural area.

Unlike the original proposal, the revised development does not include water-intensive or large-scale commercial components, thereby addressing UCPR concerns regarding servicing capacity and groundwater impacts.

## **Mineral Aggregate Resource Area**

The subject property is located within a Mineral Aggregate Resource Area.

An Aggregate Impact Assessment has been completed in accordance with Official Plan policies. The assessment concludes that the proposed development:

- will not preclude or hinder future extraction of the resource;
- represents a low-intensity and reversible land use; and
- serves a greater long-term public interest by supporting sustainable rural tourism and economic diversification.

The proposed cabin development does not involve permanent structures or land use patterns that would sterilize the resource and is therefore compatible with the intent of the Official Plan policies.

## **Groundwater Protection (Section 5.5.9)**

As identified in the UCPR comment letter dated July 30, 2025, a hydrogeological assessment was initially requested to evaluate the potential impact of the proposed development on groundwater resources, particularly in relation to the originally proposed spa component and associated water demand.

Since that time, the project has been significantly revised. The current proposal is now limited to a maximum of ten (10) cabin units for short-term accommodation, and no longer includes any water-intensive uses such as a spa or wellness facility.

Based on consultation with the project engineer, the revised development is anticipated to generate low water demand comparable to that of low-density rural residential use, and well below thresholds that would typically trigger Ministry of the Environment, Conservation and Parks (MECP) approval requirements or necessitate advanced hydrogeological assessment at this stage.

Given the reduced scale and servicing requirements of the project:

- the proposed use can be supported by private servicing systems appropriate to the rural context;
- the development does not represent a high water consumption use; and
- the potential for impacts on groundwater resources is considered limited and manageable.

Should it be required by the City at a future stage, a scoped hydrogeological assessment can be undertaken to confirm detailed servicing design; however, based on the current proposal, such a study is not warranted to support the zoning by-law amendment.

### **Natural Heritage – Significant Woodlands (Section 5.5.6)**

The subject property contains significant woodland features.

An Environmental Impact Statement (EIS) has been prepared and concludes that the proposed development will not result in negative impacts on natural heritage features or ecological functions, provided that recommended mitigation measures are implemented.

The revised site layout reflects the recommendations of the EIS by:

- minimizing vegetation removal;
- avoiding sensitive features;
- maintaining natural buffers; and
- preserving the ecological integrity of the woodland.

### **Conclusion**

The revised proposal addresses the concerns raised by UCPR by:

- completing all required technical studies;
- reducing the scale and intensity of the development; and
- aligning the proposed use with applicable policy requirements.

As a result, the proposed development now demonstrates conformity with the United Counties of Prescott and Russell Official Plan, representing a low-impact, environmentally sensitive, and appropriate form of rural development.

### **4.3 CITY OF CLARENCE-ROCKLAND OFFICIAL PLAN**

The subject property is governed solely by the United Counties of Prescott and Russell Official Plan, as the City of Clarence-Rockland's Official Plan does not apply to lands located outside of the designated settlement areas.

### **5.0 ZONING BY-LAW**

The subject property is currently zoned **Rural (RU) Zone** under Section 13.1 of the City of Clarence-Rockland Zoning By-law. The RU Zone permits a variety of residential, agricultural, recreational, commercial, and institutional uses.

#### **Permitted Uses in the RU Zone**

##### **Residential Uses:**

- Detached dwelling
- Group home

##### **Accessory Residential Uses:**

- Additional residential unit

- Bed and breakfast
- Hobby farm
- Home-based business, rural
- Home-based daycare
- Home industry
- Short-term rental

**Retail Uses:**

- Garden centre
- Outdoor farmer's market

**Service Commercial Use:**

- Veterinary clinic

**Employment Uses:**

- Artist studio
- Custom workshop
- Outside storage
- On-farm diversified uses
- Agriculture-related uses

**Institutional/Community Uses:**

- Place of worship

**Open Space Uses:**

- Agriculture
- Boarding kennel
- Cemetery
- Conservation use
- Equestrian establishment
- Fairground
- Forestry operation

**Proposed Zoning By-law Amendment – Tourist Commercial (CT-Exception)**

The subject property is currently zoned Rural (RU) under the City of Clarence-Rockland Zoning By-law No. 2016-10. The RU Zone permits limited recreational and rural uses but does not adequately support the proposed short-term accommodation use in cabin form.

It is proposed to rezone the property to a Tourist Commercial (CT) Zone with a site-specific exception (CT-Exception) to permit a low-intensity, tourism-oriented use.

## **Existing CT Zone Framework**

The CT Zone permits a range of tourism and recreational uses, including:

- Tourist Establishments;
- Campgrounds;
- Outdoor recreational uses; and
- Complementary commercial and service uses.

These uses establish a policy framework that supports short-term accommodation and visitor-oriented activities within a rural context.

## **Nature of the Proposed Use**

The proposed development consists of a maximum of ten (10) cabins for short-term accommodation, designed as a low-density, nature-based tourism use.

The cabins:

- will be used exclusively for short-term rental;
- will not function as permanent residential dwelling units;
- will not be individually owned; and
- will operate as part of a single, unified commercial operation.

For clarity, the proposed cabins are not “tiny homes” and are not intended to meet the definition of dwelling units under the Ontario Building Code.

## **Need for a Site-Specific Exception**

While the CT Zone permits tourist establishments and campgrounds, it does not explicitly contemplate:

- cabin-style accommodation units; or
- repurposed shipping containers as accommodation.

Accordingly, a site-specific exception is required to:

- permit cabins as a form of short-term accommodation;
- permit one (1) repurposed shipping container as an accommodation unit; and
- establish clear parameters to ensure the use remains non-residential in nature.

## Proposed Site-Specific Provisions

Notwithstanding the provisions of the CT Zone, the following site-specific regulations are proposed:

### Permitted Uses

Cabins for short-term accommodation, to a maximum of **ten (10) units**;

- One (1) repurposed shipping container permitted as an accommodation unit;
- A single detached dwelling as an additional permitted use;
- Accessory buildings and structures;
- Up to four (4) shipping containers for storage purposes.

### Cabin Use Provisions

The cabins shall:

- be used exclusively for short-term accommodation;
- not be used as permanent residential dwelling units;
- not be individually conveyed, leased long-term, or used for full-time occupancy; and
- operate as part of a single, unified commercial operation.

One (1) shipping container may be repurposed as a cabin unit, subject to:

- compliance with the Ontario Building Code;
- use for short-term accommodation only;
- no stacking;
- placement in accordance with an approved site plan; and
- prohibition of permanent residential use.

A maximum of four (4) shipping containers may be used for storage, subject to:

- no human habitation;
- no permanent foundation or connection to utilities;
- no stacking; and
- appropriate screening and location through site plan control.

## **Waterfront and Performance Standards (Section 4.46 Shoreline**

### **Activity Area and Natural State Shoreline Area)**

The CT Zone requires that tourist establishments or campgrounds with water access provide a minimum water frontage of 75 metres.

The proposed development:

- consists of only ten (10) units, well below thresholds triggering additional requirements; and
- will comply with all applicable provisions related to:
  - setbacks from watercourses; and
  - shoreline protection measures.

Given the limited scale, the proposal fully aligns with the intent of these provisions.

## **Zoning Justification**

### **1. Alignment with Official Plan Policies**

The proposed development supports rural tourism and economic diversification while maintaining the natural character of the area. The reduced scale ensures compatibility with the Rural Policy Area designation.

### **2. Appropriate Scale and Intensity**

The development is limited to ten (10) units, representing a low-impact and modest form of development. The removal of previously proposed intensive uses ensures that the project remains appropriate for the rural context.

### **3. Compatibility with Surrounding Uses**

The proposal:

- maintains buffering from adjacent properties;
- minimizes impacts related to noise, traffic, and lighting; and
- preserves the natural landscape.

### **4. Servicing Feasibility**

The development will rely on private servicing systems appropriate to its scale. The reduced number of units ensures minimal servicing demand and avoids the need for municipal infrastructure expansion.

## **5. Reinforcement of Non-Residential Use**

The proposed zoning framework ensures that the development remains non-residential in nature, preventing the establishment of permanent dwelling units and limiting the potential for rural fragmentation.

## **6. Economic and Community Benefits**

The proposal supports small-scale tourism, contributes to local economic activity, and introduces a managed and low-impact use that enhances the property while maintaining environmental integrity.

### **Proposed amendment:**

That the lands subject to this amendment be rezoned from Rural (RU) to Tourist Commercial Exception (CT-XX) to permit a low-intensity, tourism-oriented use.

Notwithstanding the provisions of the Tourist Commercial (CT) Zone, the following shall apply:

- Cabins for short-term accommodation shall be permitted to a maximum of ten (10) units.
- One (1) repurposed shipping container may be permitted as an accommodation unit, provided it complies with the Ontario Building Code.
- A maximum of four (4) shipping containers may be permitted for storage purposes

### **Conclusion**

The proposed Zoning By-law Amendment represents a refinement of existing permitted tourism uses within the CT Zone, rather than the introduction of a fundamentally new use.

The site-specific exception provides a clear and controlled framework to permit a modest, well-designed short-term accommodation use that:

- aligns with the intent of the Zoning By-law;
- maintains compatibility with the rural context; and
- addresses agency and public concerns through a significantly reduced scale of development.

The proposed amendment enables a contemporary, low-impact form of rural tourism while maintaining full control over intensity, scale, and land use compatibility.

## **6.0 SITE PLAN PROCESS**

A Site Plan Control process will be required to facilitate the proposed development of the proposal. Through this process, the municipality and other agencies will have the opportunity to review and approve detailed elements of the project such as building placement, site access, parking, internal circulation, landscaping, servicing, stormwater management, and buffering from adjacent uses. The Site Plan Agreement will ensure that the development proceeds in a manner that is orderly, functional, and consistent with municipal design standards, while also addressing compatibility with the surrounding rural character and protection of environmental features such as the nearby watercourse and groundwater recharge area.

## **7.0 CONCLUSION**

The proposed development, consisting of a maximum of ten (10) cabins for short-term accommodation, represents a low-impact and carefully considered form of rural development that is appropriate for the subject property.

The application has been substantially revised since its initial submission in response to both public feedback received at the public meeting and comments from reviewing agencies. The original concept has been scaled down to eliminate higher-intensity components and is now limited to a modest number of cabin units, significantly reducing potential impacts related to servicing, environmental disturbance, and compatibility.

In support of the revised proposal, the required technical studies have been completed and reviewed, and their findings have informed the site design. The development has been planned to minimize environmental impacts, maintain natural buffers, and preserve the existing landscape in accordance with the recommendations of the Environmental Impact Statement.

The proposed use aligns with the intent of the Rural Policy Area designation by introducing a small-scale, tourism-oriented use that supports rural economic activity while maintaining compatibility with surrounding land uses. The cabins are not intended to function as dwelling units and will operate as part of a single, unified commercial operation, ensuring that the development does not contribute to rural residential fragmentation.

The proposed Tourist Commercial (CT-Exception) zoning is the most appropriate framework to regulate this use. It allows for a clearly defined and controlled form of short-term accommodation while ensuring that the scale, intensity, and function of the development remain consistent with the rural context.

Overall, the revised proposal demonstrates good land use planning. It reflects a balanced approach that responds to community concerns, is supported by technical analysis, and provides a compatible, low-density, and environmentally sensitive development that contributes positively to the local area.

The reduction in scale provides clarity and certainty regarding the ultimate development of the site, ensuring that the use remains modest, controlled, and appropriate over the long term.

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