

**Ministry of  
Municipal Affairs  
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September 3, 2025

*By Email*

Kristin Darling, Intermediate Planner, MHMC  
Township of Machar  
113 Collier Street  
Barrie ON L4M 1H2  
[kdarling@mhbcplan.com](mailto:kdarling@mhbcplan.com)

Re. **One Window Provincial Review Comments**  
**Draft Official Plan Amendment – Official Plan for the Township of Machar**  
**MMAH File No. 49-OP-242249**  
Subject site: PCL 18631 SEC NS; PT LT 24 CON 7 MACHAR PT 1, 42R7001;  
MACHAR and PCL 17381 SEC NS; LOT 23 CON 7 MACHAR T/W PT 1,  
42R6802 AS IN LT 140722; MACHAR

Dear Kristin

Thank you for providing the Ministry of Municipal Affairs and Housing (MMAH) with a draft copy of the above referenced site-specific Official Plan Amendment (OPA) for review and comment. This letter provides comments on behalf of our one-window partner ministries and the MMAH regarding matters of provincial interest to ensure that the draft OPA is consistent with the Provincial Planning Statement, 2024 (PPS) and other relevant provincial policies and legislation. The PPS can be downloaded here: [Provincial Planning Statement, 2024 | ontario.ca](#)

The Ministry is aware that a site-specific zoning by-law amendment was received with the OPA and notes that the comments herein apply only to the OPA application.

**Application**

The purpose of this application is to amend the Township of Machar Official Plan (OP) to permit the creation of a tourist commercial camp. The subject site is located on the eastern shore of Eagle Lake in the Township of Machar, District of Parry Sound. The OP has two designations for the subject property, with the portion adjacent to Eagle Lake being designated as “Shoreline” and the remaining portion designated as “Rural”. Per policy B4.4 of the OP, the “Shoreline” designation includes all lands within 300 metres adjacent to Eagle Lake. Per policy B4.3, permitted land uses within the “Shoreline” designation include single dwellings, tourist commercial uses, marinas and recreational uses which existed on the date of approval of the Official Plan. Tourist commercial camps are not permitted. Section B.4.6 states that new commercial uses within the “Shoreline” designation will require an OPA.

Per section B1.3, tourist commercial camps are permitted in the “Rural” designation, however section B1.5.6 of the OP states that the expansion and development of existing or new commercial tourist camps may be permitted in the “Rural” designation subject to rezoning and site plan control.

The Applicant intends to do the following to facilitate this proposed tourist commercial camp:

1. Amend Schedule ‘A’ Land Use, to redesignate a portion of the subject site from “Shoreline” to the site-specific designation “Shoreline-XX”.
2. Amend section B4.3 of the OP to permit Tourist Commercial Camp uses in the site specific “Shoreline-XX” in addition to the permitted uses in the existing “Shoreline” designation.

### **Water Servicing and Sewage**

Policy 3.6.4 of the PPS 2024 states where 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.

The subject lands are proposed to include the following sewage and water services: a kitchen area (with greywater pit), four outdoor toilets and two outdoor showers (onsite septic system), two existing outdoor toilets near parking lot (number and type unclear) and a proposed outhouse. Potable water is not proposed for the site.

The Scoped Environmental Impact Study (SEIS) provides that an estimated minimum of 3,300 L/day of sewage will be produced at the site during seasonal operations. However, the combined sewage flow of all systems, including the kitchen gray water, outhouses, and outdoor toilets has not been provided.

Please provide a complete estimation for the combined sewage flow of all systems, including the kitchen gray water, outhouses and outdoor toilets. Should this estimate be above 4500 litres per day, additional Environmental Compliance Approval (ECA) requirements may be identified upon receiving a complete estimate.

### **Surface Water Quality and Lake Capacity**

Policy 4.2.1(g) of the PPS 2024 ensures consideration of environmental lake capacity, where applicable. Per policies B4.4 and B4.8 of the Official Plan, Eagle Lake is considered over capacity for shoreline development, and all development on lands designated “Shoreline” within 300 metres of the high-water mark of the lake shall be deemed to have an impact on the lake unless it can be demonstrated otherwise. As per the OP section B4.10, and the Lakeshore Capacity Assessment Handbook, development is allowed within 300 metres of Eagle Lake if the proponent can demonstrate a net reduction of phosphorus to the lake.

In the SEIS section 11.1, septic system site alterations are not included in the list of General Considerations. The impacts of the septic system are commented on, however, in the following list of potential impacts. It is important to consider the impacts of the septic system during construction phase, when ground is bare (post-construction), along with the impacts of septic use during its operational life.

It is noted on page 29 of the SEIS that: “According to the proponent’s septic installer, the septic system can be constructed in ground due to the sandy substrates and will not require fill materials being relocated to the site for the purpose of constructing the septic (unless a high-water table is encountered).” This is not congruent with the Lakeshore Capacity Assessment Handbook.

Where lakes are at capacity, the Lakeshore Capacity Assessment Handbook restricts development except in certain circumstances. Development may occur where certain municipal planning tools or agreements are in place, such as site plan control under the Planning Act and a site-specific soils investigation prepared by a Qualified Professional documents the following:

- the site where the septic tile-bed is to be located, and the region below and 15 metres down-gradient of this site, toward the lakeshore or a permanently-flowing tributary, across the full width of the tile bed, consist of deep (more than three metres), native and undisturbed, non-calcareous (<1% CaCO<sub>3</sub> equivalent by weight) overburden with acid-extractable concentrations of iron and aluminum of >1% equivalent by weight (following Robertson 2005, 2006, Appendix B). Soil depth shall be assessed with test pits and/or boreholes at several sites. Samples for soils chemistry should be taken at a depth adjacent to, or below, the proposed tile bed; and
- an unsaturated zone of at least 1 ½ metres depth exists between the tile bed and the shallowest depth (maximum) extent of the water table. The position of the water table shall be assessed with test pits during the periods of maximum soils saturation (e.g., in the spring, following snowmelt, or late fall).

As a result, to ensure the proposal will not negatively impact Eagle Lake, an in-situ soils assessment completed in accordance with Lakeshore Capacity Assessment Handbook is required to verify phosphorus retention and attenuation assumptions and confirm that native soils would be suitable for the purposes of the septic system. If importing soils represents a better option for phosphorus attenuation, it is recommended that the proponent choose that option as per Best Management Practices of the Lake Capacity Assessment Handbook.

Should soils be appropriate, additional development controls through agreements registered on title, or site plan control should be used to ensure the lands are developed in a manner which does not result in additional nutrient loading to Eagle Lake.

In addition, within the SEIS report, it is stated that the proponent wishes to add new sand to the beach area. It is further noted that cautionary measures will be put in place to limit the migration of the sand material. The addition of sand in and around the water, however, represents a nutrient load to the lake. It is recommended that the proponent not add sand to the beach area as this will directly introduce phosphorus to the lake and nullify the intent of non-impact development for the proposal.

Finally, the *Planning Rationale Report* (page 32) in the B4.10 (Non-impact Development) states that “Furthermore, an EIS has been commissioned as part of this application to demonstrate that the proposed development will not cause an increase in the phosphorus levels in any of the lakes above the 20mg/L standard”. Noting ministry

staff's assumption that this is a typographical error in the SEIS and should read ug/L as opposed to mg/L. In Eagle Lake, a 50% increase above natural background levels is indicated to be 5.3 ug/L for the north basin range (LCA, 2013). A standard of 20 ug/L is not appropriate as it implies remaining capacity.

### **Archaeology**

Policy 4.6.2 of the PPS 2024 states that planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved.

The subject property meets the provincial criteria for archaeological potential because it is within 300m of Eagle Lake. According to our records, an archaeological assessment of the subject lands has not been undertaken.

An archaeological assessment of the entire subject property is required to support a formal application. The assessment must be undertaken by an archaeologist licensed under the *Ontario Heritage Act*, who will submit the report directly to the Ministry of Citizen and Multiculturalism (MCM) for review as per the terms and conditions of their licence. A letter issued by the MCM indicating that the report(s) has been entered into the Ontario Public Register of Archaeological Reports must be provided to the MMAH and the recommendations will be followed.

### **Right of way Easement**

Policy 3.2.1 of the PPS 2024 states transportation systems should be provided which are safe, energy efficient, facilitate the movement of people and goods, and are appropriate to address projected needs. The site is proposed to be accessed by private driveway, via an easement to connect the subject site to Jim Young Road over the southwest neighbour's property. It is noted that at this time, an easement is registered over the neighbour's property, but it is located incorrectly. The planning rationale report notes that this will be corrected in the future.

Please provide further information on details about the proposed access and where is to be located, and confirmation that the proposed easement has been obtained if proceeding to a formal application.

### **Conclusion**

Please note that these staff-level comments do not constitute an approval by the Minister of the proposed site specific OPA. Should council choose to adopt this OPA and submit it, along with the prescribed and requested information, to the ministry for a decision, further review by the ministry and partner ministries may identify additional matters for discussion. Applications and fees can be found at the following link: <https://www.ontario.ca/page/applying-changes-land-use#section-2>. Please ensure that all questions on the application form are answered, and if not applicable, please indicate N/A. Appendix A summarizes the information requested in this letter to support a formal application.

If you have any questions or would like to discuss these comments, please contact Blaine Yatabe, Planner, with Municipal Services Office – North (Sudbury) at 249-885-2939 or by email at [blaine.yatabe@ontario.ca](mailto:blaine.yatabe@ontario.ca).

Sincerely,

A handwritten signature in grey ink, appearing to read 'Blaine' followed by a stylized flourish.

Blaine Yatabe, Planner  
[Blaine.yatabe@ontario.ca](mailto:Blaine.yatabe@ontario.ca)  
Municipal Services Office – North (Sudbury)  
Ministry of Municipal Affairs and Housing

Copy: MECP, MCM, MNR, Stephanie Apollonio and Bob Hoang (1968792 Ontario Inc.)  
Mallory Nieves, Biglierigroup

**Appendix A - List of supporting materials required:**

- Complete estimation for the combined sewage flow of all systems;
- In-situ soils assessment per Lakeshore Capacity Assessment Handbook;
- Archaeological assessment; and
- Further details on access, including where is to be located, and confirmation that the proposed easement has been obtained if proceeding to a formal application.