

Date: June 12, 2025

Halifax Regional Municipality

5251 Duke Street, Suite 300

Halifax, NS B3J 3S1

Attention: *HRM Planning & Development*

**RE: Peddy's Brook Estates – Land Lease Community – 3575 Old Guysborough Road, PID: 41396623
Planning Application – Development Agreement Rationale Letter**

Introduction

Twin Rivers Homes Ltd. is proposing a new land-lease community development located at 3575 Old Guysborough Road (PID: 41396623), in Devon, Nova Scotia, as shown in Figure 1. The proposed development includes 100 modular single family residential dwellings. Twin Rivers Homes Ltd. owns and operates numerous similar land lease communities throughout Atlantic Canada, and have extensive experience with private water and wastewater systems.

The land is located within the Halifax Regional Municipality. Specifically, the land is zoned “MU” and falls within the Musquoduboit Valley/Dutch Valley Land Use By-law. It is understood that policy MU-3 allows for mobile home parks through development-agreements. It is also understood that the development must satisfy the requirements requirements of policy IM-10.

The purpose of this letter is to summarize the intent of the proposed development, and demonstrate the the requirements of MU-3 and IM-10 are satisfied for this stage of the development.



Figure 1: Project location, 3575 Old Guysborough Road, PID: 41396623

Project Documentation

Concept Site/Servicing Plan

A preliminary concept site/servicing plan has been created for the proposed development. This plan illustrates the proposed private road network alongside the proposed lot fabric. The proposed water, wastewater, and stormwater servicing intent is also illustrated within these plans. We have summarized each of the key elements of these plans below:

- **Street system:** This development is proposing a private street network, with individual driveways serving individual modular homes off the private street. The street system will be designed to satisfy all requisite garbage and fire truck turning movements during detailed design. The proposed modular homes must be delivered on large multi-axel trucks. Therefore, in addition to HRM requirements, truck turning is also a critical design element for the developer themselves.
- **Water system:** The development is proposed to be serviced with a series of private drilled wells, which will distribute domestic water through a central distribution system to each individual home. Strum Consulting completed a level 1 groundwater assessment to establish preliminary groundwater parameters for the proposed system. The concept servicing plan shows the proposed well locations, as well as the proposed water distribution system. More information on the findings of the level 1 groundwater assessment is included below.
- **Wastewater system:** The development is proposed to be serviced with a series of central septic systems, with a gravity sewer collection system delivering wastewater discharge to the individual septic systems. Preliminary septic system calculations were completed based on provincial soils mapping and provincial LiDAR to establish conservative estimates of the footprints of each central septic system. The exact size, location, and type of septic system is subject to detailed design, and field sampling/testing.
- **Stormwater system:** The development is proposed to be serviced with open ditches, running alongside the private street. These ditches will ultimately drain into storm ponds, sized to satisfy pre- and post-development stormwater runoff balancing. The precise location and size of each individual storm pond is subject to detailed street and lot grading design. However, we have included a preliminary stormwater management plan which includes preliminary stormwater management calculations, demonstrating that the stormwater management on site is feasible.

Stormwater Management

As discussed above, a preliminary stormwater management plan has been created for the proposed development and is attached to this application. The stormwater management system will consist of open ditches, which will drain to individual stormwater managements ponds, prior to discharging to the environment. Preliminary stormwater management calculations have been completed to illustrate the ability to balance pre- and post-development stormwater runoff. The precise location and size of each individual storm pond is subject to detailed street and lot grading design.

Traffic Impact Statement

DesignPoint has completed a traffic impact statement (TIS) in relation to the proposed development. As discussed above, the site is located at 3575 Old Guysborough Road, which is a rural two-lane minor collector with a posed speed of 80 km/h. This section of road is owned by the Nova Scotia Department of Public Works (NSDPW). Peak hour traffic volumes were provided by NSDPW and were used as the basis of this TIS.

The results of the TIS indicated that signals, left turn lanes, or right turn lanes were not warranted on Old Guysborough Road. It was determined that the main entrance and the existing street network can accommodate the traffic generated by the proposed development. An access review identified a potential sight distance issue with vehicles approaching the main entrance from the east. It is recommended that a topographic survey be completed during the detailed design stage of the project. Pending the findings of the

topographic survey, the intersection sight distance will be re-measured, and it is possible that vegetation may need to be cleared within the public right of way.

Level 1 Groundwater Assessment

Strum Consulting completed a level 1 groundwater assessment for the subject parcel, to establish preliminary groundwater parameters, and to assist with the water servicing strategy for the site. The findings of the report indicate that a reasonable water demand for the site would be between 120,000 and 202,500 Litres per day. The report suggests that this water demand is achievable based on the proposed unit count for the site. The report flagged potential groundwater quality concerns relating to iron, pH, and manganese. Water treatment devices exist for each of these contaminants and can be implanted if further testing determines that their presence is above applicable guidelines.

A level 2 groundwater assessment is recommended to be completed during detailed design to confirm the assumptions and information gathered during the level 1 groundwater assessment.

Building Type

Twin Rivers Homes intends to construct prefabricated modular homes for this development. We have included photos below illustrating examples of the type of structures that are being considered for this project.



Figure 2: Sample home A



Figure 3: Sample home B

Policy Criteria

For facilitation of review municipal review, we have summarized the policy criteria within MU-3 and IM-10 in the table below.

Table 1: Policy MU-3 Criteria and Responses

Policy criteria (MU-3)	Response
<i>a) the adequacy of proposed park services including the provision of a potable water supply, the disposal of sewage, recreation facilities and street lighting.</i>	<p>Proposed parkland is shown on the provided concept plans, exceeding the required 10% parkland area requirements.</p> <p>Potable water supply is addressed by the level 1 groundwater assessment and is illustrated on the concept servicing plans. Subject to detailed design.</p> <p>Sewage disposal is addressed through central septic systems, preliminary septic sizing has been completed. Subject to detailed design.</p> <p>Recreation facilities and street lighting are subject to detailed design.</p>
<i>b) The ability of education facilities, emergency (fire and police) services, and recreation facilities to adequately service the increased demands of the additional development or to respond with the provision of additional services.</i>	The proposed street layout is illustrated in the attached concept plans. Truck turning exercises for garbage, emergency, and building delivery will be subject to detailed road design.
<i>c) The provision of landscaping or buffering from adjacent land uses.</i>	A 20 m watercourse buffer is shown in the attached concept plans. The parkland dedication is also shown on the attached concept plans, exceeding the 10% site requirements.
<i>d) Adequacy of storm drainage plans.</i>	Preliminary stormwater management plan attached to this application.
<i>e) The impact of proposed development on the existing road network in terms of traffic generation and vehicular and pedestrian safety.</i>	Traffic impact statement completed and attached to this application.
<i>f) Park layout and design including the design of the internal road networks and separation distances from maintenance buildings.</i>	Proposed parkland is shown on the attached concept plans, exceeding 10% dedication requirements. There is a proposed trail shown along the existing Peddy's Brook, with the intent to create park space along the brook. Nova Scotia Department of Public Works (NSDPW).
<i>g) The provisions of the Mobile Home Park By-law.</i>	As noted in this letter.
<i>h) The provisions of Policy IM-10</i>	See table 2 below.

Table 2: Policy IM-10 Criteria and Responses

Policy criteria (IM-10)	Response
<i>a) That the proposal is in conformity with the intent of this Planning Strategy and with the requirements of all other municipal by-laws and regulations.</i>	This is summarized throughout this letter, and the various attachments included with this application.
<i>b) That the proposal is not premature or inappropriate by reason of (items i-v).</i>	A level 1 groundwater study, preliminary septic calculations, preliminary stormwater management plan, and traffic impact statement have all been completed at this stage of development. Additional information and analysis will be completed during detailed design.
<i>c) That controls are placed on the proposed development to reduce conflict with any adjacent or nearby land uses by reason of (items i-vi)</i>	A level 1 groundwater study, preliminary septic calculations, preliminary stormwater management plan, and traffic impact statement have all been completed at this stage of development. Additional information and analysis will be completed during detailed design.
<i>d) That the proposed site is suitable with respect to the steepness of grades, soil and geological conditions, locations of watercourse, marches or bogs, and susceptibility to flooding.</i>	A detailed grading plan for the development will be subject to detailed design. Preliminary groundwater, septic, and stormwater calculations have been completed based on available provincial databases. Further analysis is subject to field studies/sampling during the detailed design phase of the project.
<i>e) Any other relevant of planning concern.</i>	Subject to review.
<i>f) Not applicable.</i>	Not applicable.

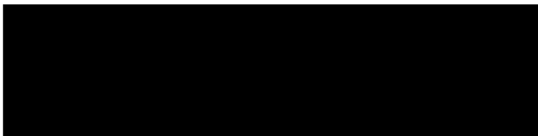
As noted above, we believe that the intent of each of these policies is satisfied based on the provided documentation in this planning application, and the stage of design that this project resides. Several items will be expanded upon during the detailed design phase of the project.

Closing

We believe that we have satisfied all planning requirements in support of this development agreement application. Please reach out should you have any questions or should you require any additional information.

Thank you,

DesignPoint Engineering & Surveying Ltd.



Jeremy Wyatt, P.Eng.

Civil/Water Resources Engineer