



June 14, 2016

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**RE: LAKE OF BAYS OFFICIAL PLAN**

Dear Chair John Klinck and Members of District Council

The recently adopted Lake of Bays Township Official Plan is presently before the District of Muskoka for approval.

The Lake of Bays Association (LOBA) represents approximately 1300 family property owners / stakeholders around the Lake of Bays. Our mandate is and has been for over 40 years to *"promote, maintain and enhance a clean and healthy natural environment, a well serviced community and a safe and peaceful Lake of Bays"*. We interpret this mandate broadly to consider matters that directly and indirectly affect the natural environment of the area, our local communities and our members, many of whom are permanent residents.

We understand the vital importance of the reciprocal relationship between our members and the local communities and, with modest sums, LOBA has been investing in projects to benefit the local communities over the last few years and expect to continue to do so in the future. Our members depend and will always depend on the strength of the local communities and vice versa.

At the core, however, we recognize the universal truth in Muskoka that the local economy is and always has been built on tourism, and tourism in Muskoka is built on the natural environment. We believe strongly that changes to planning or other policies that impact the natural environment need to be carefully studied and evaluated so that the short and long term impacts may be understood to ensure they do not individually, or in aggregate, unintentionally degrade the economic engine and unique quality of Muskoka - its natural environment.

In our March 10, 2016 letter to District Council we raised two concerns about the proposed amendments to the Township of Lake of Bays Official Plan:

1. **The reduction in the front yard setback requirements for development of environmentally sensitive lakes.** The reasons for our objection to this change are set out in that letter but, in summary, they are that the Township of Lake of Bays Planning Consultant and Staff recommended against this change and the Township offered no evidence or report to show that this change would not have a negative effect on these lakes. To the contrary, the report of the Township's Planning Consultant referred to 3 local/provincial studies and noted 16 other studies that support greater front yard setbacks and vegetative buffers for a variety of environmental and ecological reasons. At the time the setback change was proposed by Township Council, it had done no calculation on which or how many lakes would be affected by this change. In its review of this issue (for which LOBA is grateful), the District identified that some 80 lakes in the Township of Lake of Bays would be affected by this change. Of these lakes, the District identified 16 that are provincially regulated as Sensitive Lake Trout lakes and directed the Township to exclude those lakes from the application of the new setback policy. We support this modification. We also recognize that there is no planning policy in the District of Muskoka Official Plan to evaluate the broader impacts of this change in the setback requirement. LOBA remains concerned about reduced setbacks on so many small lakes, and we urge the District to develop tools that will allow the environmental impacts of these sorts of changes to be fully evaluated.
2. **The second issue of concern that we expressed in our March 10, 2016 letter was the reduction in back lot acreage requirements from 10 to 7 acres.** We understand the impact of this reduction will result in the possible doubling of developable back lots on Lake of Bays alone from 27 to 53. It is not known how many additional lots may be created by this policy change elsewhere in the Township of Lake of Bays.

Again, both the Township Planning Consultant and Staff recommended against this change and yet Township Council proceeded with it without a clear policy basis for this change or any analysis of how many lots this would result in, where they would be located or how this might affect municipal servicing requirements. We now believe that the intended policy basis for this proposed change is to create more affordable housing opportunities for full-time residents. However, the conclusion of the Township's Planning Consultant in its discussion paper on this issue is that a reduction in back lot size would not result in more affordable housing opportunities and the work of the District (which identified where new back lots could be created under the proposed new policy) concluded that there is already a 20 year supply of such properties that have not been developed. We are also aware that the Province has now, twice, objected to this policy change advising that it is against the Provincial Policy Statement.

**As a result, LOBA maintains and reiterates its objection to the reduction in the back lot standards proposed in the revisions to the Township of Lake of Bays Official Plan and urges District Council to reject this change.**

LOBA understands that its concern on the back lot issue has been characterized as a conflict between “affluent” waterfront property owners against the wishes of the full-time residents. This is unfortunate and untrue and unnecessarily divides our community. Our membership has a broad socio-economic composition with many full-time Muskoka residents. Approximately 50 percent of our Board of Directors are full-time residents. LOBA’s interests and concerns are for the overall long-term vitality of Muskoka, its environment and economy for all residents. LOBA is concerned about the need to improve the stock of affordable housing in the Township and across the District because of the importance of the relationship between the local communities and our members and we are particularly concerned about the strength and vitality of the local communities in the Township of Lake of Bays. LOBA has offered to assist in studying the issue of affordable housing with the Township and note the new opportunities for creating affordable housing that may emerge through Bill 204 “Promoting Affordable Housing Act” which has recently been introduced in the provincial legislature. We urge the District and the Township to conduct thoughtful studies and to develop appropriate policies to identify how our local communities may be revitalized and thrive in the years ahead. LOBA is prepared to participate in any planning studies or work to develop alternative options for more affordable property and better access to the lake for those not living on the waterfront.

LOBA recognizes the importance of the Official Plan as being the vision and statement of principles and policies for a municipality with which all other planning instruments must be consistent. As the key municipal planning document, LOBA is concerned that changes to the Township of Lake of Bays Official Plan be based on good planning principles and advice from planners and appropriate consultants. As noted, with respect to these two issues, no planning studies have been prepared by the Township that support the proposed changes.

Throughout the Official Plan Review process, it has been our objective to raise our concerns in a fair and respectful manner and to have them received and dealt with in a like manner. That is, again, our intention in sending this letter.

It is noted that this communication was endorsed by unanimous resolution at our June 11 Board meeting.

All of which is respectfully submitted.

Thank you.



Ian Beverley  
President  
Lake of Bays Association

**C.C.**

District Municipality of Muskoka (Samantha Hastings)  
Ministry of Municipal Affairs and Housing (Mark Christie)  
Members of Township of Lake of Bays Council  
Lake of Bays Association Board of Directors  
Members of Lake of Bays Association (via website Newsflash)