



**Date:** 2025-05-22

**To:** April Best-Sararas, abest-sararas@lakeofbays.on.ca

**Re:** **Official Plan Review Policy Directions Report**

The Lake of Bays Association (LOBA) represents 1,200 waterfront property owner families who support a balanced approach to development that protects the natural shoreline. Thank you for providing LOBA the opportunity to comment on the Official Plan Review Policy Directions Report.

We appreciate the directions taken after initial public consultations, as outlined in Section 3.3.1, particularly:

- Protecting and preserving the “natural charm” of the Township.
- Protecting the waterfront areas from the encroachment of “overdevelopment”.
- Balancing progress with tradition.
- Promoting strong local and community services.
- Shoreline development and redevelopment.

We look forward to the Draft of the Official Plan and the opportunity to comment further on it.

In the meantime, LOBA has comments on several sections of the Directions report. Please be aware that we recognize there may be other issues not mentioned here, and our current lack of comment does not prevent us from providing feedback on all parts of the OP in the future.

### **Section 3.3**

The introduction in the Directions Report, section 3.3, states: “We heard that there should be clearer policies to address redevelopment and additions to existing cottages.” LOBA agrees. And this builds on observations in the prior *Research Report on Shoreline Development and Water Quality* (posted on the Official Plan webpage under Resources). At page 17, that prior report says:

“Lake management is typically focused on how to control and manage future development as developers adhere to planning policies in order to get building permits. Existing development presents a much larger stress to lakes than future development because of the amount and type of development that currently exists. Policies for limiting impacts associated with existing development are generally sparse *and not often enforced*. Cottage development and redevelopment in the Township has increased in intensity with larger cottages, more permanent residency, short-term rentals, manicured lawns, and extensive landscaping, all of which present

more impacts on adjacent waterbodies than more modest and traditional cottage development.”

Yet, the Directions Report does not make clear proposed Policy Directions to address the challenges posed by increasingly intense redevelopment of existing structures.

LOBA believes it is of the utmost importance to consider both new development and redevelopment that involves the retention and enlargement of existing structures equally when it comes to retention of vegetation, avoidance of tree removal, construction of accessory structures, roads and driveways and other manmade features. We assume that this will be reflected in the Draft Official Plan.

LOBA recommends that when policies are developed that reflect the recommendation in **Section 3.3.1, Natural Heritage Systems, Bullet 2, page 17**, the policies include not only new development but also include projects that involve additions to existing structures, as maintaining vegetation, avoiding tree removal, the location of accessory structures, septic systems, and roads and driveways are as important in projects that involve the retention of existing structures.

### **Section 3.6 Sustainable Development in Waterfront Communities**

#### **Section 3.6.1 Policy Directions**

##### **Bullet 3 under Sustainable Development in the Waterfront Area**

Bullet three (3) is especially concerning to LOBA, as it could result in overdevelopment and seems to contradict policies and direction elsewhere in the Directions Report. Bullet 3 recommends:

“Introducing a revised minimum lot area (i.e., 1 ha [2.5 ac]) for backlot development on new lots and existing lots of record in the Waterfront designation, with direction for the Community Planning Permit By-law to establish an appropriate minimum lot frontage for backlot development in the implementing community planning permit areas of the Waterfront designation.”

As presented, this Direction has no justification and appears to conflict with other policy direction contained within the report, including Section 3.1:

“**Protecting the waterfront areas from “overdevelopment”** by prioritizing measures to promote lake system health and preserve natural features for future generations, incorporating a balanced approach between the “untouched nature” and environmentally and economically sustainable development, encouraging the preservation of a naturalized shoreline, and addressing the growing trends of short-term rental accommodations in the waterfront areas.”

If smaller backlots are permitted in the Waterfront designation, it is possible that a large number of lots could be created throughout the Township. This could mean that more than one smaller back lot could be located adjacent to an existing lot and have access to it, resulting in a cluster of development - which is over-development. Smaller backlots would also have a deleterious effect on the character of the landscape because of the proliferation of driveways close to the lake - leaving less “untouched nature” (see above) for future generations.

This Proposal does nothing to protect Lake of Bays Township and its residents or to preserve its character – the very character the Directions vows to preserve.

LOBA believes that as the Directions evolve, a further bullet in this Section could be added:

- Updating policies to better and more defensibly regulate cottage redevelopment, including the redevelopment of non-conforming uses, to ensure that the natural shoreline is not compromised.

### **Section 3.6 Sustainable Development in Waterfront Communities**

#### **Section 3.6.1 Policy Directions**

##### **Bullet 1 under Stormwater Management**

LOBA supports the recommendations to manage stormwater runoff to ensure that it does not run into the lake but wonders if there is some confusion in the language of Bullet 1. The current text reads:

“Reinforcing current policies which promote stormwater management best management practices and supplementing these with additional policies which encourage landowners to maximize the extent of **impervious** surfaces (wherever possible) when developing or redeveloping a waterfront property.”

We believe that the intention of this bullet is to encourage permeable, not impervious surfaces.

#### **Other issues**

LOBA has noted that cultural heritage is not mentioned in the Directions report. We look forward to seeing a cultural heritage section in the Draft version of the Official Plan.

Sincerely,

Paul Gleeson, President for Tim Hadwen, Chair Planning, Development and Government Relations Committee

Copies: LOBA Planning Development and Government Relations Committee members  
LOBA Board of Directors