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October 20, 2020

Mayor Smith and Members of Council
The Corporation of the Town of Bracebridge
1000 Taylor Court
Bracebridge, ON P1L 1R6

Attention: Matt Holmes, Manager of Planning Services

Dear Mayor Smith, Members of Council, and Mr. Holmes,

Re: Official Plan Amendment D09-08/18 and Rezoning Application D14-17/18 (Muskoka Royale Development Inc.)

Thank you for providing the Muskoka Lakes Association (MLA) the opportunity to comment on the Muskoka Royale application. The MLA represents more than 2500 families within Muskoka, extending from Seguin Township in the north to Gravenhurst in the south, as well as Bracebridge and the Township of Muskoka Lakes. Our association includes residents on the three big lakes and the numerous small lakes within Muskoka. We previously provided comments on this application in a letter dated April 2, 2019. This letter provides additional comments and is not intended to repeat our previous submission.

PLANNING

It is our understanding that there have been no changes to the proposal to develop a boarding school and summer camp on the site that will provide educational, recreational, and residential facilities for the students and staff. Development is proposed in five (5) precincts to support up to 1800 students and 171 staff.

ENVIRONMENT

We remain concerned for the scope and scale of development that is proposed for this largely natural area. The EIS prepared on behalf of the proponent and other documents prepared by consultants for the Town and the South Bracebridge Environmental Protection Group have identified the presence of wetlands, potentially significant terrestrial habitats as well as the presence of or potential for a number of Species At Risk. Wetlands are important landscapes for water management and biodiversity. Careful assessment and mitigation of adjacent land use changes need to be incorporated into any development plan.

The South Bracebridge Environmental Protection Group has called for the wetlands to be evaluated for provincial significance. We agree that this is required to be done pursuant to the Provincial Policy Statement, and that it should be undertaken to ensure that the attributes of the individual wetlands and their connections are understood and protected. Just putting a line around a wetland and adding a buffer is insufficient to ensure their continued functioning.

Scale is important, not only in planning but also for the environment. Understanding linkages and functional relationships within and among features is essential to protecting and managing them.

Additional site-specific detail will be required to ensure that the features identified are confirmed, surveyed, and additional mitigation measures designed including wetland water balances and storm water drainage design. The MLA supports site plan control for each of the precincts and an updated EIS to reflect the larger picture and any modifications to the development plans.

We support the application of a holding provision to each precinct, requiring acceptance of a site-specific EIS as a condition for its removal. Each site-specific EIS must include specific mitigation measures to be applied within the precinct including buffers, water (storm and water balance) management and tree protection.

This bears repeating – we cannot expect the developer to avoid wetlands yet accept that the Town continues to pursue the Bracebridge bypass which is shown to bisect one of the wetlands that has been identified for protection on the site. The MLA would encourage Bracebridge to rethink the alignment of that segment of the road where it enters Stephens Bay Road.

We wish to be notified of the decision of the Town of Bracebridge in respect of the proposed By-law. Please send all notices to Susan Eplett, MLA Chair Government and Land Use Committee susaneplett@rogers.com.

Sincerely,



Deborah Martin-Downs
President MLA

c.c. Katie Edwards, General Manager, MLA
Susan Eplett, Chair Government and Land Use Committee
Matt Holmes, Manager of Planning Services
planning@bracebridge.ca.