

June 10, 2020

Dear Chair Klinck, Mayor Harding and
Township of Muskoka Lakes Councillors,

Re: Official Plan Review for Minett

We are writing in support of the recommendations made by the Director of Development Services and Environmental Sustainability in his June 11th 2020 report regarding the Resort Village of Minett Joint Official Plan Policy Review, which appears as item 5(h) in the Agenda for the June 11th Special Council Meeting. In particular, we support the Director's recommendation to extend the deadline for a completing a draft Official Plan Amendment for Minett (Minett OPA) to August 2020. Although it would be our preference for Staff to lead the drafting for the Minett OPA, given their extensive knowledge of Minett, we are not opposed to retaining a consultant to assist with drafting the OPA with the cost shared by TML and the District.

On behalf of all our supporters and members, Friends of Muskoka and the Muskoka Lakes Association would like to reiterate our appreciation to the Township and District elected officials and their Planning departments for establishing the Minett Joint Policy Review Steering Committee (Minett Steering Committee) and providing it the time and resources to come forward with well researched and thought out recommendations for the Minett area, which will undoubtedly have implications beyond this particular area.

The recommendations made by the Minett Steering Committee are based on sound advice from the Committee members themselves and expert evidence provided through two studies: the May 6, 2020 Altus Group study on Muskoka's Waterfront Economy (Altus Study), and the June 3, 2020 Riverstone Environmental boating impact assessment for Wallace Bay. As you know, the final recommendations are the result of almost two years of deliberations among Committee members representing many areas of expertise and all facets of our Muskoka community, rather than the interests of any single property owner or stakeholder. For this reason, we urge the District and Township to incorporate all the Minett Steering Committee's recommendations into the Minett OPA.

In particular, we urge the District and Township to adopt these evidence based recommendations of the Minett Steering Committee:

1. Minett should remain a small resort community, as there is no proven demand for substantial additional resort capacity in the District.
 - The Altus Study analysed waterfront accommodation needs until 2046, and found "a need for some 270 net new four-season resort suites, which could be met by one new resort, or a series of expansions across existing resorts." (p. 88)

- The Altus also found that “the seasonal own-use recreational cottages industry is by far the most significant contributor to Muskoka’s waterfront economy.” (p. 86)
2. Minett should remain predominantly commercial, beyond the few residences that currently exist there, as market based data has shown there is very little demand for additional residential housing in the Township of Muskoka Lakes (TML).
 - The recent Growth Strategy Forecast delivered by Hemson Consulting Ltd. to the District on February 8, 2019 expects an average of 13 new permanent residents and 83 new seasonal residents per year in TML over the next 30 years, which translates into fewer than 30 new cottages and homes per year.
 - According to the District’s own figures, there are already more than 575 vacant buildable lots on lakes Rosseau and Joseph. That means there are already enough buildable lots in TML to cover 20 years of demand at the projected growth rate.
 3. Development in Minett should proceed on private communal services with adequate protections and securities for TML, so as not to encourage substantial additional density. There exists more than adequate excess capacity for projected growth in existing municipally serviced hubs and resort villages elsewhere in the Township and District. It would not make sense, nor would it be fiscally responsible, to create yet another set of potentially under-utilized municipal septic services in Minett.
 4. In the event that resorts will be financed with condominium ownership structures, restrictions should be put on owner usage to ensure commerciality of resorts. We support Council adopting the Conditions for the Provision of Resort Commercial Accommodation as outlined in Schedule X of the Minett Committee’s final report.
 5. Development in Minett should proceed according to the Minett Steering Committee’s recommendations relating to environment first including protection of wetlands, trees, slopes and shorelines, as well as incorporating climate change. This will help ensure that development has a light environmental footprint and be designed in a way that is mindful of the impacts that climate change will bring to Muskoka over the coming decades. The Minett committee’s recommendations for the environment represented an overarching theme for the area – and should feature prominently to ensure building is done differently than many of the recently constructed resorts.

It is our understanding that the new owner of the majority of Minett lands plans to build a low density resort and wellness centre in an environmentally sensitive manner. We are fully supportive of this approach as it is consistent with the recommendations of the Minett Steering Committee and the vision of the residents of Minett and broader Muskoka community. Nevertheless, the OPA needs to ensure the expectations are clearly articulated in the event of change of ownership.

The March 27, 2020 LPAT decision relating to Legacy Cottages highlighted a glaring deficiency in TML's Official Plan: the Minett policies were not linked back to the waterfront policies in the District's Official Plan (see paragraph 38 of the LPAT decision). Typically, secondary plan policies such as Minett's state that the policies of the overall designation in the primary plan are applicable. There are multiple examples of this in Ontario, including in the cities of Brampton and Toronto. We urge TML Council to correct this deficiency by specifically linking the Minett policies to the District's and Township's Official Plan policies.

We also urge Council to use language in the OPA that outlines expectations, since using terms such as 'may' or 'best ability' rather than mandatory words such as 'shall' only encourages debate and legal challenges of interpretation.

Thank you for your consideration and we welcome this opportunity to preserve what we all love about Muskoka.

Sincerely,

Friends of Muskoka



Donald Lang, Chair

Muskoka Lakes Association



Lawton Osler, President

cc: Samantha Hastings, Commissioner, Community and Planning Services
 Summer Valentine, Director of Planning
 David Pink, Director of Development Services and Environmental Sustainability