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April 2nd, 2019

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 and Jeremy Rand, Senior Planner

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

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 this 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.

It is our understanding that the applicant intends to develop a boarding school and summer camp on the site that will provide educational, recreational and residential facilities for the students and staff. Up to 1800 students, and 171 staff will be housed in dormitories and staff apartments. The development is to be on full municipal services. The development parcel is 179 hectares (ha) (443.5 acres) of a total 336 ha (830 a) parcel and contains forest, wetlands and rock barrens.

While this is not the type of application that the MLA typically becomes engaged in as it is not a shoreline issue, with such interest on the part of the local shoreline residents we have reviewed some of the background documents (EIS) and staff reports and response to comments prepared for the application to determine if there are issues that may benefit from further scrutiny. As with other files the MLA has engaged on, scale and scope of development are key themes. This application proposes a boarding school of a size that increases the capacity of boarding schools in Ontario by an estimated 40%.

PLANNING

The lands are within the urban boundary of the Town of Bracebridge. The Urban Centre permits, amongst other uses, community facilities including a private school. So the use itself does not need an official plan amendment. The OP amendment is to provide further specific policies on how the lands are to be developed. In fact, it takes away a number of use options.

The new site-specific designation is “South Bracebridge Institutional use”. The permitted uses within this designation are defined as only “public or private secondary school, elementary school, multi-use recreational facility summer camp activities accessory onsite living accommodations and ancillary uses such as trails, nature pavilions, servicing infrastructure and other associated uses”. Therefore, the broad range of uses that previously applied to these 443 acres no longer will apply. In addition, there is a policy that states residential uses not accessory to the school shall not be permitted. These are positive controls for the use of the site.

However, the proposed zoning bylaw does not provide sufficient limitations to the site development. The zoning bylaw fails to quantify the maximum number of pupils/staff for the site or number of dwelling units that are permitted, setback and buffer requirements and building details. There is no guidance or direction in the zoning by-law with respect to the development of a "Dormitory" use (ie. there are no set standards or requirements). This further omission from the amendments leaves open a significant loophole allowing for potentially unregulated growth in the proposed development and its number of users.

The MLA recommends that Council defer a decision on the zoning by-law to incorporate further details of precincts, setbacks, building heights, maximum floor areas or density into the zoning.

ENVIRONMENT

It is unfortunate that a natural area should be disturbed for development over finding a site in the Town with more suitable building sites. However, this is the site chosen for this application.

Overall, the EIS prepared for the applicant provides a reasonable overview of the ecological characteristics of the area, identifies some, but not all, key species and habitat types that are present and require protection, identifies some impacts associated with the proposed development plan, and presents a strategy to address potential impacts through buffers and mitigation approaches that will be identified at a future date. This level of detail would be expected at this stage of the development. 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. Concerns have been expressed for significant wildlife habitat on the site and the inability to meet the policies of the Provincial Policy Statement (PPS). While the school site pads may only cover 15% of the property, they are distributed throughout the site which has a greater impact on the integrity of the natural areas. Several of the pads are situated very close to the protected wetlands. Despite the mitigation measures to be applied, the application cannot claim no negative impact. Trail locations should be defined and limited to ensure that access through the site is controlled and impacts reduced.

We would also note that the Bracebridge bypass bisects one of the wetlands that has been identified for protection on the site and would encourage Bracebridge to rethink the alignment of that segment of the road where it enters Stephens Bay Road.

As the development parcels are built they will introduce impermeable surfaces and contaminants in runoff. The Town is encouraged to require low impact development techniques to be applied to all of the development areas to incorporate permeable paving, bioswales and other techniques that will serve to detain, filter and infiltrate runoff prior to being discharged. Certain contaminants such as salt cannot be removed by any stormwater technique, but incorporating more permeable pavement into the development blocks will reduce the need for salt.

The MLA recommends that a more detailed and updated EIS be prepared based on more site specific detail and evaluation including natural feature inventory and delineation, wetland water balance, storm water drainage, trail locations and other recreations infrastructure. The Town should require low impact development storm water management techniques to reduce the development impact on the natural features.

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 Deborah Martin-Downs, martin_downs@sympatico.ca.

Sincerely,



Deborah Martin-Downs
Chair, Government and Land Use Committee

c.c. Lawton Osler, President MLA
 Katie Edwards, General Manager, MLA
 Michael Hart, President, Stephens Bay Association
 Michael Appleby, Chair, South Bracebridge Environmental Protection Group
 Lori McDonald, Director of Corporate Services/Clerk