

**F.F. (Rick) Coburn**  
T: 416-367-6038  
rcoburn@blg.com

Borden Ladner Gervais LLP  
Bay Adelaide Centre, East Tower  
22 Adelaide Street West  
Toronto ON M5H 4E3  
Canada  
T 416-367-6000  
F 416-367-6749  
blg.com



August 5, 2021

**DELIVERED BY EMAIL**

Friends of Muskoka  
c/o Laurie Thomson  
Stepping Stone Island  
Port Carling  
POB 1J0

Attention: Laurie Thomson

Dear Laurie:

**Re: Friends of Muskoka  
Township of Muskoka Lakes Official Plan Policy Review  
Support for Limiting Requests to Redesignate Lands to “Resort Commercial” to  
Comprehensive Reviews**

We write in connection with Friends of Muskoka’s participation in the consultation process regarding the Township of Muskoka Lakes’ (“Township”) new Official Plan (“OP”) and further to your request for a commentary as to why Council may wish to consider adopting a strong policy framework which would limit the redesignation of new *Resort Commercial* areas to the time when the Township undertakes a comprehensive review of its Official Plan. Under the *Planning Act* such a review must be undertaken no less frequently than within 10 years after a new official plan comes into effect, and thereafter every five years. The *Planning Act* (subsection 22(2.1)) prohibits applications to amend the OP for a period of two years following approval.

The analysis undertaken by the professional resorts consultant engaged by the Township and the District of Muskoka indicates that the Township has more than enough existing capacity to meet the needs of the tourist resort market for the next 20 years. The number of resort units at existing resorts is likely to double in the next 10 years. It is clear that the Township does not need new resorts in the current plan horizon.

At the same time, the market for the condominium model of resort is driven by demand for this type of cottage experience, rather than by the tourist markets. The impacts of this hybrid form of

residential/resort development at commercial densities on the vitality of the tourist resort market and the planned function of the existing *Resort Commercial* designation are not well understood. A quantitative and qualitative assessment of these impacts, together with related environmental impacts, requires time for the impacts to manifest themselves, and should be undertaken in a comprehensive fashion. The comprehensive review cycle is ideally suited for this type of analysis.

The next comprehensive review will occur well before any need for additional capacity will materialize. If the suggested approach is adopted, the Township will be able to assess its future requirements on a Township-wide scale and on the basis of a well informed analytical foundation, rather than responding to piecemeal applications which may frustrate efforts to plan comprehensively.

We understand the Township is adopting a precautionary approach to shoreline development through its new OP. The lakes are a finite resource and it should not be presumed that all evolution and change is appropriate for the shoreline and shoreline development, particularly where intensity of use is concerned.

BLG's land use planner, Adam Shipowick ([ashipowick@blg.com](mailto:ashipowick@blg.com)), would appreciate the opportunity to meet with the Township planner and/or its consultant to discuss.

Regards,



F.F. (Rick) Coburn

RC/LE