



Date: 2026-04-14

To: April Schnurr, Director of Planning, Township of Lake of Bays
Mayor and Councillors, Township of Lake of Bays

Re: Township of Lake of Bays Draft Official Plan Revision 2

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 of Lake of Bays. LOBA has been supportive of many new elements of the draft OP Rev. 1. We are also in favour of most of the new elements in the draft OP Rev.2. However, we submit there are a number of provisions that still need to be included to ensure adequate protection of the lake and its shoreline.

Changes still needed

Although these needed changes have previously been identified by LOBA, we are raising them again because of their importance.

The s. 3.6.2.3 l) ix treatment of low contrast colours still refers to “encouraging” their use. Stronger wording is needed. High contrast colours are an eyesore that jarringly interrupts the colouration of a natural shoreline. LOBA continues to suggest saying that low contrast colours “should be” used.

The s 3.6.2.3 o) shoreline frontage vegetation buffer requirement increase to 30 metres, which aligns with the draft District OP, is a welcome and key support for a real littoral zone that provides filtration and cooling for the lake, and habitat for animals and spawning fish. However, the wording in the Township OP is softened to say “generally”, rather than “at least”, which causes LOBA some concern. We understand the practical value of some flexibility to deal with local conditions and ensuring net improvement, but the requirement for vegetation buffers needs to remain robust. LOBA suggests more specificity about what is required for an adequate vegetation buffer.

The Draft OP Rev.2 does not increase the new lot size requirement to the standard proposed in the District OP. LOBA strongly supports a standard approach across the District. As we submitted to the District about the District OP:

The Draft District OP General Policies C2.6.3.2 b) states that *'all of the lakes in the District are considered to be sensitive surface water features'*. We are very supportive of this recognition that climate change is a threat to all lakes and is best addressed by a consistent District wide approach.

The Draft District OP Standard Protection Policies C2.6.4.2 a) proposes that the minimum water frontage be increased to 90 m or 295 ft for new lot creation and a minimum lot size. We support larger new lots, as they will reduce the numbers of new buildings, structures and docks and thereby increase the retention of natural shoreline.

We urge the Township to support this strong consistent approach to protecting the District's water features.

The s. 9.3.6 language on non-complying properties still does not deal with the "tear down", where new buildings are routinely given the benefit of the historical non-complying setback as the presumed basis for redevelopment. The result is large new builds located intrusively close to the water. To fix this, LOBA proposes the following wording [change in bold]:

A non-complying building or structure may be **replaced**, enlarged, repaired or renovated provided that the enlargement, repair or renovation

We continue to advocate for an exception to the requirements of s. 9.3.6 to allow the new dwelling to have the same footprint and dimensions as the preexisting non-complying building plus minor variances. This exception will allow owners of non-complying dwellings to replace them with a substantially similar new dwelling.

The other problem with s. 9.3.6 3 a) is saying the non-compliance cannot be further increased unless permission is granted, without setting a specific standard for deciding whether to give permission. There should be a specific standard, and it should be that the addition is minor. Major additions to non-complying buildings should not be permitted because they result in the further violation of the setback standards that are appropriate for waterfront properties. Permitting minor additions only would be consistent with the shoreline protection provision in 4.2 3) c that only allows minor additions to dwellings that have a lesser setback than normally required.

The changes we propose would, we believe, really help protect the shoreline of the lake.

Supported Provisions

LOBA is pleased to support numerous new provisions in Rev. 2 of the Official Plan, including:

- the s. 2.2 addition of the concept of “complete communities”, as complete communities are the true goal of planning;
- the s. 2.5.1 addition of additional tools to encourage affordable housing, as affordable housing provides dignity to persons with low incomes and supports the local retention of the workforce badly needed for the economic wellbeing of the towns around the lake;
- the s. 2.5.3: a) v) addition that Garden Suites are not permitted in Waterfront Residential Areas, which is appropriate given the risk of misuse;
- the s. 2.5.8 prohibition of floating accommodations, which would otherwise pose a real threat to the environment and disrupt the planned use of shoreline;
- the s.3.6.2.1 inclusion of redevelopment within the scope of the standards, as it is essential that development standards also apply to the redevelopment of properties which is ever more common and a major source of potential overdevelopment;
- the S 3.6.2.3 o) [formerly 15)] requirement for a shoreline frontage vegetation buffer of 30 metres, which, as we have noted above, strongly supports a real littoral zone. There is an exception to the 30 metres for redevelopment of an existing lot that is at more than 20 metres setback, which LOBA also supports as a sensible compromise.;
- S. 3.6.2.3 l) xvi) adding lighting standards to the list of design principles, which empowers requiring compliance with dark skies policies so that excessive and misdirected lighting can be controlled. LOBA appreciates this change and, to make sure it works well, we suggest using the following wording be used:

Exterior lighting will only be approved if it is consistent with the Dark Sky By-Law (By-law 2013-131) as amended from time to time. Lighting shall be directed downwards, focus internally and not be affixed to structures in excess of the building height and should be designed to be dark sky friendly so as not to interfere with the view of the night sky or spill into surrounding properties.

- the s. 4.1.1 k) statement that boathouses are to be for boats and marine equipment, which should prevent the overbuilding of boathouses as entertainment centres that are inappropriate for the waterfront;

- the s. 3.6.2.5.2 f) requirement that new residential lots on an island which is less than 4 hectares in size will now have a minimum lot area of 1.6 hectares instead of 0.8, which prevents overdevelopment of particularly visible and vulnerable waterfront; and;
- the s. 3.6.5.2 j) increase of the size of new backlots from 2 to 3 hectares and from 90 to 130 frontage, with an exception for development of existing back lots, which helps ensure smaller backlots do not put pressure on the natural environment.

The Lake of Bays Association very much appreciates your continued attention to our submissions.

Sincerely,

Paul Gleeson
President

Tim Hadwen
Chair, Planning, Development & Government Relations Committee

Copies:

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Lake of Bays Association, Board of Directors

Lake of Bays Association, Planning, Development & Government Relations Committee