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December 9, 2022

Mayor Koetsier and Members of Council
Township of Georgian Bay (TGB)
99 Lone Pine Road
Port Severn, Ontario L0K 1S0

Re: Proposed Amendments to the Township of Georgian Bay Official Plan, Section I.5.1 - Site Plan Control, Development Services Report 2022-96, and matters related to Information Report, Development Services 2022-98 H2 Holding Bylaw

Dear Mayor and Councillors,

We are writing to confirm our support for the attached letter from Elizabeth Halpenny (“Halpenny”) on the above matter and to provide a summary of the main issues and action that we recommend is taken by TGB.

The Georgian Bay Association (GBA) is an umbrella organization for 18 community associations along the east and north shores of Georgian Bay, representing approximately 3,000 families. We have been advocating on behalf of our land-owning members for over 100 years and estimate that we reach and influence around 30,000 residents of the Georgian Bay. Our mandate is to work closely with our water-based communities, including the five coastal municipalities and other key stakeholders, to ensure the careful stewardship of the greater Georgian Bay environment.

Our primary concern is that development applications of any kind, including the lifting of holds, are processed in such a way that all efforts are made to ensure environmental protections are fully maintained on the lot or island in question.

With the introduction of various measures by the current Ontario government to streamline the development process, including **Bill 190** and now **Bill 23**, it has become very important for municipalities to ensure that the correct process is followed when development/hold applications are received, in order to: maintain municipal control over the process; maximize the retention of environmental protections; and avoid negative impacts on the precious resource that we all enjoy, Georgian Bay.

The attached letter from Halpenny is a comprehensive review of the current situation with a well-presented rationale on how to proceed. Central to Halpenny's recommendations is that an **Interim Control Bylaw** is put into effect now, which will halt all applications for new development and/or lifting of holds, in order to provide sufficient time for TGB to: fully review the impacts of the above new legislation; determine the optimum planning process protocol; and put that protocol into effect.

Our assessment is that the above proposal on **Site Plan Control** is flawed as it does not comply with current planning regulations. In particular, pushing the studies and assessments needed to properly assess a property's suitability for development to the back end of the process (Site Plan Control) will not work, because TGB will have no authority to require those studies/assessments be done at that stage. Furthermore, as Halpenny describes, both Bill 190 and Bill 23 create additional problems related to this proposal, which will either be insurmountable, or will create a high risk of additional costs to TGB. We therefore strongly recommend that this proposal is rejected by TGB in favour of the steps recommended by Halpenny.

With regard to the **lifting of holds**, we strongly support the changes proposed by Halpenny that all studies and assessments are done at the outset and that a site visit is a prerequisite for processing all such applications. This would allow TGB to properly assess a lot or island's suitability for development **before** processing the application and "starting the clock" per Bill 190 timing requirements.

Finally, it would appear from the work we have been doing on these topics over the last year, and the clear rationale provided by Halpenny, that TGB must assemble a **Guidance Manual** on what studies are required and when in the planning process for all applications. This will take time and clearly supports Halpenny's recommendation for an Interim Control Bylaw to allow sufficient time to get this right.

We hope this is helpful and would welcome the opportunity to participate in further discussions on this matter.

Yours sincerely,

A handwritten signature in blue ink that reads "Rupert Kindersley". The signature is written in a cursive style with a horizontal line underneath the name.

Rupert Kindersley
Executive Director