

Northern Vision Planning



September 3, 2025

The Honourable Rob Flack, Minister of Municipal Affairs and Housing

Dear Minister Flack:

RE: Proposed Redevelopment of Muskoka Regional Centre Property
Muskoka Bay, Lake Muskoka, Gravenhurst

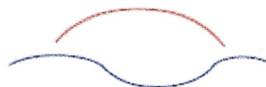
The Muskoka Lakes Association represents over 2,000 families with properties located on the waterfront in the heart of Muskoka. The Association actively monitors development on the lakes and provides comments on behalf of its members.

Northern Vision Planning Ltd. has been retained by the Association to comment on the above noted matter. It is understood the Muskoka Regional Centre redevelopment project by Cliff Bay Muskoka Corp. is as follows:

- A land area of 77 ac. above the water's edge
- Mix of Resort Commercial buildings and Residential uses
- Resort Commercial uses consisting of Hotels which are 5 and 6 stories in height
- Restaurants and banquet facilities
- Spa
- Residential buildings consisting of 6 storey buildings
- Parking garages up to 4 stories in height
- Some retained open space areas
- Total of 1,378 Units, 2,272 car parking spaces
- 80 boat slips in a Marina

It is understood the Muskoka Lakes Association does not object to developing of the property but does so in its current form. It was indicated at the Public Information Session that the Proposal was following the requirements of the Town's Official Plan and Comprehensive Zoning By-law but as seen in this submission, this is not the case and runs counter to many policies/regulations of each document. Significant amendments to the Proposal are required. The Association has concerns with the following matters.

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A. Background Studies and Timing

A Public Information Session was held on July 16, 2025. At that time Mr. Bob List of List Planning Ltd. stated a Planning Report would be completed following the meeting and public comments on the Proposal would be accepted up until August 6, 2025. This Report has yet to be completed and has effectively given the Association no opportunity to review the Report.

Certain other background studies and reports have also not yet been made available. We were told at the Public Information Session that a Functional Servicing Report, Environmental Impact Study (a number of years old), Construction Mitigation Plan, Stormwater Management Plan, and Traffic Study are being completed but we have not been provided with them despite efforts to obtain them. The Proponent's website has not been updated with copies of the reports as of the writing of this letter.

B. Land Use

Clarification of the use of the property is necessary. It would appear that much of the proposed use is Residential although the majority of the proposed zoning in the Proponent's draft Minister's Zoning Order is Commercial. Residential density is used to substantiate the Proposal in terms of units per acre but the Proposal appears to be implemented by various Commercial zoning categories.

If developed as a Commercial Resort development, the Urban Resort Commercial densities in the Official Plan should be used. In such a case, this would result in 930 units, far less than the proposed 1,378 units.

A certain amount of Commercial development will result in new jobs for the Community. The Proposal, however, appears to be more Residential in nature which will not bear the same employment numbers. The Association's trepidation in this regard is further fueled by the substantiation of the project on Residential densities.

A definition in the Proponent's proposed draft Minister's Zoning Order for Branded Residences would be helpful. Are they Commercial or Residential?

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C. Development Locations

The current Official Plan for the Town of Gravenhurst designates the property as Institutional. In reviewing the policies as it directly relates to the Muskoka Regional Centre property, it is apparent they are open for new development and that the Town would like to see the property redeveloped. Policy C 9.3 are specific policies that apply to the Muskoka Regional Centre lands. Policy C9.3.3, however, firmly states there will be the preservation of the 30 m. setback and the shoreline vegetation. The specific wording of the Policy is as follows:

C9.3.3 Prior to redevelopment of these lands, open space to be protected will be appropriately delineated and supported by an Environmental study prepared by the owner in consultation with the Municipality and agencies that includes documentation of natural heritage features and functions. The first 30.0 metres from the shoreline will be maintained as public open space and shall not count as part of the requirement for the 30 percent parkland dedication.

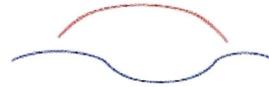
This is clearly not adhered to by this Proposal. At the Public Information Session it was indicated the setbacks were 7.5 m. from the water's edge for the Hillside Villas. All other development will have a setback of 20 m. It was also stated by the Proponent that the "shoreline is to be kept pristine". New development needs to be setback 30 m. to conform to the Official Plan.

Typically, proposals such as this where there is a significant increase in density on the property compared to surrounding development, the density of development is graded to lower densities and heights the closer one gets to the property boundaries. This is not the case in this Proposal. It is our view that this can be easily accomplished on the property.

D. In Water Shoreline Structures

Dwellings and Accommodation Units over the lake in two storey boathouse type structures are not permitted as of right in the Town of Gravenhurst Comprehensive Zoning By-law. This is contrary to the notion that the Proposal is following the requirements of the Comprehensive

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Zoning By-law. In addition, the architect has indicated the structures will be located 30 ft. (9 m.) apart. This creates a number of issues including the following:

- a. Such structures are not permitted at this density over the water along the shoreline in any Residential or Commercial zone in the Comprehensive Zoning By-law.
- b. The visual intrusion on the natural shoreline will be significant.
- c. There will be potential privacy concerns between Dwellings and Accommodation Units at this density.
- d. Noise will travel across the water unmitigated impacting properties across the bay. Overall, Muskoka Bay in this location is narrow.
- e. Floodproofing to elevation 226.9 m. over the water including sewage and water lines and the structure appearance from the water. Additional floodproofing for wave uprush must also be included.

The number of shoreline structures must be drastically reduced or eliminated in an attempt to meet the intent of the Official Plan in this regard. Unit size for units along the shoreline have also not been clarified.

E. Employment

The positive impact the Proposal will have on employment has not been adequately articulated. The Proponent has touted this as a strong component in support of the Proposal. Once gain, clarification of the use of the property would be beneficial. The commercial component of the project will provide the greatest opportunity for future employment. It must be ensured that the commercial component will be constructed particularly early in the staging of the project. One of the hotels must be built in the first phase and future Residential not be permitted until substantial completion of the first phase. Year round employment must be emphasized and required.

F. Phasing

How is the project intended to be phased? As noted previously, at least one hotel with a minimum number of units should be required within the first phase. There must also be a commitment in the first phase for the provision of certain amenities such as a restaurant, retail

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space, and/or spa. This must be further built out in future phases with the new phases contingent on completion of previous phases.

G. Minister's Zoning Order

Detailed comments on the draft Minister's Zoning Order (MZO) will be provided under separate cover. With that said, in summary there are some fundamental issues with the MZO as currently drafted:

- The height of structures should be reduced and needs to be stepped down where it abuts existing Residential use.
- Shoreline structures extend too far out into the lake and are far too dense.
- Setbacks from the shoreline are not consistent with the Official Plan as it specifically relates to this.
- There are a lack of provisions related to use of the property including the shoreline structures.
- A number of additional definitions (including Dwelling, Branded Residence) would provide clarity.

H. Conclusions

In conclusion, there are a number of issues which need to be addressed through amendments to the Proposal as currently proposed. The Proposal is not in conformity with the Town Official Plan or the Town Comprehensive Zoning By-law as purported by the Proponent. Significant amendments to the Proposal through the Minister's Zoning Order must be implemented.

Sincerely,

A handwritten signature in blue ink, appearing to read 'S. Fahner', written over a horizontal line.

Stephen Fahner B.A. (Hon.), A.M.C.T., CMMIII, M.C.I.P., R.P.P.
Northern Vision Planning Ltd.