

WOODLAND BEACH PROPERTY OWNERS' ASSOCIATION

Working together to encourage community spirit and wise environmental practices

Attention: Shawn Persaud, Director of Planning, Tiny Township

Re: 2017 Draft Official Plan

Thank you for the opportunity to comment on the Township's Draft Official Plan. While the WBPOA is generally in agreement with the content of the proposal, there are two specific areas of concern:

Secondary Dwellings and Garden Suites

The first is the section on **B.4.3 Permitted Uses** (attached) which deals with garden suites and secondary dwelling units. WBPOA does not believe this section is appropriate for a shoreline community, especially one which views itself as a "family beach" and a recreational area. Woodland Beach is primarily a vacation community with the majority of residents being seasonal. It is not practical to target such a community for affordable housing. It is likely that over time such housing would simply become rental property for the owners, who would look to charge market rates for vacation property rather than below market subsidized housing rates. This would defeat the intent of the program and simply result in additional income for property owners. WBPOA suggests that the affordable housing initiatives be concentrated on the more urban areas noted in the study, such as Wyevale, Perkinsfield and Lafontaine.

In addition, Woodland Beach presently lacks infrastructure, such as public transportation, which would be required to accommodate significant population growth, especially if the new residents are seniors. The roads in the surrounding area are already in significant disrepair, and additional residents would exacerbate the problem. Flooding of sections of roadway has been a long-standing problem, made worse this past summer not only by heavy rainfall, but also by manufactured drainage issues such as over-building, significant paving of driveways and parking areas and excessive tree cutting. In addition, recent growth has already taxed the waste management system in Woodland Beach. The majority of properties are 50 ft. lots, each with its own well and septic system or holding tank. In our opinion, allowing secondary dwellings and garden suites would result in disaster for the owner and possibly for neighbours as well.

The Ontario Government published the following in its Info Sheet 2017 regarding Second Units:

Official Plan Designations

"There may be circumstances where secondary units may not be appropriate given other planning considerations and policies, especially relating to health and safety or the natural environment. For example

- Areas prone to flooding
- Waterfront areas with limited lake capacity
- Areas of recreational development where there may be a lack of year-round roads and/or which lack daily needs and services residents may require"

We conclude that although the Province is encouraging municipalities to create opportunities for affordable housing, it recognizes that this would not be appropriate for a shoreline community.

Environmental Concerns

Our second area of concern is the perceived overall reduction of the Township's commitment to environmental considerations in its planning process. In the previous Official Plan, the "**Environment First**" theme was evident. However, this wording in the draft version has been de-emphasized, and there are a number of references to being "environmentally focused" instead. (examples - **Objectives Section** noted in B.2.2, and the **Waterfront Parks Section** noted in B.4.11, both attached). WBPOA views this change in wording as weakening of the environmental protection focus in the planning process. It is also interesting to note in several sections throughout the Plan including Objectives B.4.2, the environmental considerations are at the end of the list rather than at the beginning.

Our shoreline community of Woodland Beach already has many pressing environmental issues: beach degradation and over-use, dune erosion, invasive species such as phragmites, drainage problems, over-building on small lots, excessive paving and tree cutting. In our opinion, environmental concerns and wise stewardship of our fragile beach environment should be front and centre, not way down the list. It is noted that although section **B.2.13 Dunes** (attached) discusses sand dunes, it does not commit to any protection or preservation.

Part B - Land Use Designation

B.1.1 The shoreline of Tiny Township is a significant geographic feature and in our opinion deserves the same protection as wetlands. We suggest that the shoreline be designated as **Environmental Protection**, thus providing the greatest protection from development and site alteration. Such designation would mandate restoration, preservation, protection and wise stewardship of both sandy and cobble beaches and any dunes adjacent to the beach.

B.2.2 The Greenlands designation is crucial to protect and enhance Tiny's significant areas of valuable natural undeveloped heritage. Thus in **Objectives**, the focus on environmental protection should appear first (a not d).

B.2.7 We agree that woodlands are ecologically important for the reasons stated. However we would like to see this section expanded to protect not only woodlots but trees located in shoreline communities. It seems that many builders and developers do not recognize the value of trees ecologically, aesthetically and economically, and we urge the Township to protect this natural asset by passing a tree-cutting bylaw.

It is the view of the WBPOA that these suggested changes would significantly contribute to the achievement of the **Plan Objectives** noted in Section B.4.2 in the Plan. (attached). We also suggest that the Township's building code and bylaws be tightened up in order to ensure that the character of our shoreline communities be preserved.

We appreciate the opportunity to comment on the Township's Draft Official Plan, and would be pleased to discuss our input with you at your convenience.

Woodland Beach Property Owners' Association

Linda Lockyer, President

Cc Mayor George Cornell
Members of Council

ATTACHMENTS

B.4.3 Permitted Uses

B.4.3.1 Permitted uses in the Shoreline designation include single detached dwellings, garden suites and secondary dwelling units (as per the policies of D.12.2 and D.12.3), small scale office and commercial uses, public and private community parks, public and private beaches, home occupations, small scale institutional uses, and legally existing multiple residential dwellings as of the date of the adoption of this Plan.

B.2.2 Objectives

- a) To maintain and enhance the ecological integrity of the natural heritage system, including linkages and related ecological functions amongst natural heritage features and natural areas.
- b) To provide the tools to properly assess development applications located within and in close proximity to environmentally sensitive features and areas.
- c) To implement the Greenlands designation of the County of Simcoe Official Plan.
- d) To implement the 'Environment Focused' objectives of this Plan.

B.4.11 Waterfront Parks

B4.11.2 In order to implement this Policy, Park Master Plans have been prepared for each of these Parks to ensure that they are effectively planned to both accommodate public use and minimize the impacts of that public use on the environment and adjacent residential communities. Given the 'environment focused' objectives of this Plan, the development of additional parking areas, facilities and other infrastructure to support these Parks should be carried out in a manner that ensures that the natural features and functions of these Parks are protected and/or enhanced.

B.2.13 Dunes

B.2.13.1 Eolian (wind-blown) sand deposits, or dune complexes, occur in several forms in the Township. Dune complexes are found where there is an abundance of shoreline sand and prevailing winds are conducive to the transport of material through the constant movement and deposition of sand. Dune complexes range in size from large, 20 to 30 metre high stabilized systems, to low relief deposits with smaller, 2 to 3 metre high parabolic (U-shaped) dunes. Several Areas of Natural and Scientific Interest within the Township include locations where dunes are known to exist.

B.4.2 Objectives

- a) To ensure that the scale of new development is consistent with the scale and character of this predominantly recreational residential area.
- b) To ensure that the impacts of new development on the natural heritage features and groundwater resources in the area are minimized.
- c) To ensure that new development on the undeveloped lands in the Shoreline designation is properly serviced by sewage and water services.
- d) To ensure that all existing sewage systems are upgraded wherever possible.
- e) To encourage improvements to the infrastructure in the Shoreline designation.
- f) To minimize the negative impact of public use in the Shoreline designation on the environment and adjacent residential areas.
- g) To minimize the negative impact of any new development near the shores of Georgian Bay and Fairlairn Lake on the quality of those lakes.