



Gloucester Pool Cottagers Association

Second submission to the Township of Georgian Bay regarding its first draft Official Plan

Our first submission laid out three principles for our Official Plan. We asked and reiterate our request that, insofar as possible, the Township develop an Official Plan that maintains economic viability (no increased costs), legal sustainability (will withstand legal challenge) and democratic legitimacy (supported by the majority including majority support in specific community areas). Our July 20, 2012 presentation to Council is available on the Township's website at <http://www.gbtownship.ca/content/official-plan-review>

Summary of concerns

Concern about comprehensiveness of our responses

As a volunteer community-based not for profit organization, we have had insufficient time and limited availability of technical resources to complete a comprehensive examination, analysis and assessment of the first draft Official Plan. Each issue has required research, comparison with other municipalities' policies and attempts to understand the purpose of the policy and the benefit that would accrue to the community in comparison to the restriction placed on individual freedoms.

While we have read the draft Official Plan to gain a level of understanding, we are undertaking a section by section analysis of the first draft and submit herewith the detailed comments identified to the point that analysis has reached. We are quite some way from completing this undertaking. We will continue our detailed analysis and to the extent that wording is unchanged in the second draft Official Plan we will file any further comments we have as second draft comments.

Concern about elements affecting Gloucester Pool and vicinity that appear to be missing or inadequately addressed

Federal policy and regulation

There is no mention of the regulatory authority of the Trent Severn Waterway National Historic Site or Parks Canada. As Gloucester Pool is part of the Trent Severn Waterway, we would have expected to see some consideration of harmonization of the regulatory regimes.

Conversion of seasonal cottages into full time homes

Since the 1970s there has been recognition that cottage property owners from the GTA have been moving north and converting seasonal residences into full time ones. This has had noticeable effect on Gloucester Pool. There is no reference in the draft Official Plan to the impact of this trend and the differing needs it generates; it is barely acknowledged in Section C.2.3 c). In the ten years between 1986 and 1996 there was a 30 per cent increase in permanent residents along the Trent Severn Waterway. The Ontario Ministry of Finance estimates the population of the GTA will increase by nearly 50 per cent from 6.1 million in 2009 to 9.1 million in 2036. We cannot fail to be affected by this growth.

Georgian Bay Township's website acknowledges the reality on its home page and welcomes retiring baby boomers with open arms. It is front and centre on the website but not addressed in the Official Plan.

Concern about the overall thrust of the Official Plan

It is a draft Plan mostly about restrictive policies that limit individual rights. We have no issue with the need to protect our environment: however there is page after page of restrictive policies that will create more cost, more bureaucracy, more delay, more frustration, more legal battles, to achieve what? In the Gloucester Pool vicinity to the best of our knowledge we have never had any substantive environmental problems. We have a Lake Steward; we conduct annual tests of our water quality; we monitor invasive species development. Our water has always received what we would consider positive test results. To impose disproportionate restrictions on all the citizens of the municipality where there are no identified environmental problems while allowing the degradation of the environment in shallow heavily used bays in the Honey Harbour area, failing to address them while passing resolutions to permit an expansion of boating facilities in Church Bay is a lesson in hypocrisy.

Concern about proportionality

We believe there should be a more serious effort made to balance the cost and imposition of regulation for individual property owners and for the Township against the value of the benefit that will accrue to the community. The additional cost to the property owner is measurable and finite as are the administrative and enforcement costs to the Township. When it appears we have never had a substantive water quality or fish habitat problem or a shoreline degradation problem (with the apparent exception of specific locations where there are commercial docks and marina operations) what is the justification for the increased imposition of cost, delay and limitation on personal freedoms? We are simply asking for reasonable balance.

Concern about the economics of uncertainty

We are concerned about the development of restrictive policies,

in an information vacuum such as the absence of current data about fish habitat and specific wetlands and other boundary lines;

to be applied, seemingly arbitrarily to the entire Township without apparent regard for the absence of data indicating a problem apart from the issues mentioned above in Honey Harbour area bays;

with little or no ability to measure whether or not the policy has a beneficial impact. And we are concerned that such policies are being developed without regard for the economic consequences.

There appears to be no linkage between the decision-making process of the policy developers and the consequent economic imposition on property owners and the municipal treasury (i.e. property owners) to pay for the consequences of these decisions.

From our review of the Official Plan thus far, it appears inevitable that costs, delays and limitations on property owners' freedoms will be increased significantly. Similarly, the cost of implementation, administration and enforcement will be increased significantly for the Township. A simple reading of 226 pages of restrictive policy limitations including 34 different technical studies the Township is authorized to and may request, apparently at its discretion, leads to the presumptive conclusion that incremental costs, delays and limitations will be unavoidable if the Official Plan were to be approved in its current form or in a substantially similar form. We believe Council has a responsibility to act in the best interests of the community as a whole, taking account of its social welfare, its economic welfare and its environmental welfare and to adopt policies and enact bylaws that represent the optimum balance among potentially competing priorities. We and others have requested an assessment of the economic impact of this Official Plan prior to its adoption by Council. To approve this Official Plan without any foundation for gauging its economic impact would represent fiscal irresponsibility.

Concern about due process

This draft Official Plan has been almost three years in the making. It has been the product of professional planning consultants and professional planning staff employed by the Township. There was limited public consultation prior to the draft's publication. We understand that one public meeting was held in Toronto prior to the publication of the draft. Such consultation as there was appears to have centered largely on those Cottage Associations that had filed Community Plans by way of Official Plan Amendments. The Gloucester Pool Cottagers Association chose not to file a Community Plan.

By contrast, the public has had four months during the summer when business people in the Township are working flat out to serve the cottagers' and tourist needs, when many others in the community are engaged in full-time employment, and cottagers are savoring their precious

personal time at their cottages. That leaves a small number of mostly retired people who are not professional planners, are not paid and have no staff. We need more time.

We start from the premise that Official Plan policy and its subordinate regulation should be imposed where there is a demonstrable benefit to the community that cannot be achieved by other less onerous, restrictive and intrusive means. We acknowledge that the municipality is obliged to comply with the direction of Provincial and Federal legislation and policy instruments but contend that it has no basis to use that authority to extend such policy direction beyond what is required for strict compliance unless an evidence-based case can be sustained that it is necessary and economically sustainable, and meets the other tests set out later in this submission.

Concern about public input

Public input to the first draft and input prior to its publication are accessible through the Township's website. It appears that access to all public comment has not been made available. We trust this is simply a timing issue and hope to see it rectified. We would, nonetheless, ask for the sake of certainty, that all public comment be made available for review through the Township's website.

Where members of the public and community organizations have taken the trouble to file comments, we believe it would be relevant in consideration of due process requirements for the Township to publish a response to these comments setting out why Township agrees or disagrees. Such response in some circumstances could be as simple as a reference to the section in the second (or further) draft Official Plan where the comment has been considered.

Concern about the scope of the undertaking

The request for proposal (RFP) for a consultant to assist in the Official Plan Review was issued requesting the submission of bids to be made on December 22, 2009. The RFP set out detailed terms of reference covered in some five pages of text in Section 3. within the RFP. It is not clear to us that all the requirements of Section 3. of the RFP have been met and we would request that the Township confirm compliance with all provisions of the RFP or identify which provisions have not been met and explain why not.

Test criteria for the Official Plan

In our review of the language of sections and through our detailed analysis of the Official Plan insofar as it has progressed, we identified recurring questions that we believe would form a rational test of the integrity and reasonableness of this senior policy document of the municipality. The criteria that we request be applied to each paragraph in construction of the second draft are as follows.

Why is it necessary?

Which objectives does it support, if any?

Which objectives does it impede if any?

What specific outcome is being sought?

Will the policy achieve this outcome?

Does its application rely on data that is unreliable or unavailable?

If it was absent or modified to be less onerous would the objective it seeks to support still be achievable?

Is the personal restriction and cost imposed by the section proportional to the benefit, if any and is it measurable?

Does it avoid arbitrariness?

Does it avoid vagueness?

Does it avoid overbreadth?

Could it be seen as discriminatory?

Are there alternatives?

If a policy has been imported from another policy statement or legislation is it accurately reflected and cross-referenced.?

Can each main section be evaluated by the statement, "If the Township fulfills these policies it will have attained the following objectives..."?

GPCA polling process

GPCA members were polled on three topics. There are approximately 340 member properties in our Association. Approximately 230 of those are in Georgian Bay Township.

Topic 1 Single slip boathouse restriction

Out of 56 responses from Georgian Bay Township members, 95% were opposed, the overwhelming majority being strongly opposed to the single slip restriction in the draft Official Plan.

Topic 2 Application of site plan control

Out of 41 responses 100% were opposed to the broad application of site plan control with agreements being registered on title for all waterfront property

Topic 3 Development and site alteration within 120 m of a type I or unknown fish habitat.

Still in process.

Content issues

Having read through the Plan and identified items that gave rise to concern on which we polled members, after discussions with our Area Councillor, presentation to Council and discussions with other community members the Official Plan Review Committee concluded that it should embark on a line by line analysis of the draft Official Plan. This is still a work in progress but it has thus far proved worthwhile and we intend to continue this work. Relatively few paragraphs thus far have escaped without comment and we expect the final commentary will match or exceed the 226 pages of the draft. Our comments to date from our detailed analysis are set out in the Appendix annexed hereto.

Respectfully submitted

Gloucester Pool Cottagers Association Ad Hoc Official Plan Review Committee

October 8, 2012

Content issues

A.1.2.1 **“The Official Plan has been developed by the community as an important tool to be used in managing growth. The Official Plan provides a policy context for land use planning. The Official Plan sets out the goals, objectives and land use policies, which will guide economic, environmental, and community-building decisions affecting physical change and the use of land within the Township.” (Emphasis added)**

We question the statement that the “...Official Plan has been developed by the community...” Perhaps the wording should be, “...Official Plan has been developed by the municipality with specific sections of the Official Plan developed by five Cottage Associations whose Community Plans, have been incorporated intact into the Official Plan. Additional input has been provided by members of the public and several organizations”.

We question the statement “...land use policies, which will guide economic, environmental, and community-building..,” Perhaps the wording should be, “... land use policies, which will guide environmental and cultural heritage protection decisions affecting physical change and the use of land”

The Official Plan does much to divide and balkanize the community and places significant constraints on development and sustainable economic growth.

A.1.2.2 c) “providing for orderly growth that is environmentally and economically sustainable;”

Some of the executive members of some of the Cottage Associations that have drafted the Lake Specific sections of the Official Plan (Community Plans) have stated publicly their opposition to sustainable growth.

Sustainable growth is one of the cornerstones of the Township’s vision The opponents of sustainable growth, whose influence on the tone of the Official Plan is undeniable, would, if their purpose is adopted, impose a potentially divisive and unfair burden on the rest of the community to host the Township’s economic development and growth that will increase the tax revenue base for the benefit of those are unwilling to tolerate it in their back yard.

A.1.2.2 d) “protecting the resources of the Township”

This language should be changed to specifically exclude the Township’s financial resources. A plain reading would lead to the conclusion that it is one of the resources the Official Plan is intended to assist the Township Council in protecting when, in fact, it appears to be of no consequence in the body of the Official Plan. This consideration should also be given to all other

occurrences of the term resources or, alternatively it could be defined in Section J to exclude financial resources.

A.1.2.2 e) “preserving the quality of life in the Township by fostering healthy, active and safe communities.”

This language implies this strategic objective of our Township to foster the health of the community is one of preservation and yet in our entire municipality there is no family physician, no pharmacy, no dentist and no elder care facility. As the Township website notes, “Council has supported starting a wellness center, which includes a Psychiatrist, Chiropractor, Foot Care Specialist, Dental Hygienist and a registered Massage Therapist. Perhaps the wording should be changed to “improving the quality of life in the Township by supporting starting a wellness center and by fostering active and safe communities”.

A.1.2.2 f) “providing for predictable, open and integrated decision making;”

As certain of the sections of the Official Plan are vague in their characterization of terms such as “minor”, “the Township may require...”, together with uncertainties such as the possibility that various impact studies will be required, the uncertain consequences of site plan control, the possibility of site alteration restrictions and many other unpredictable powers this plan confers on the Township, we believe the Plan stands in contradiction of this objective. We suggest that the term predictable be removed on the basis that it could be misleading. And we are uncertain as to the meaning of open and integrated as it relates to the Official Plan. This objective of “predictable open and integrated decision making” appears to have been lost in the development of the Plan. In the alternative perhaps reference could be made to the sections of the Plan that do provide for predictable open and integrated decision making.

A.1.2.2 g) “interpreting and applying Provincial and District of Muskoka policy within the context of the Township.”

It would be most helpful, in the spirit of openness and integrated decision-making, if those components of the Official Plan derived from the Provincial Policy Statement and the District of Muskoka Official Plan could be identified by specific reference, or perhaps by footnote, to the respective policy instruments.

A.1.2.4 “Where there is a conflict between the Official Plan of the District of Muskoka and this Official Plan, the Official Plan of the District of Muskoka prevails to the extent of such conflict.”

While this is a clear statement of fact, it would be helpful for the Township to add a statement along the following lines, “Where such conflict appears to contrary to the interests of citizens of Georgian Bay Township or appear to impede or be inconsistent with the fulfillment of the goals of this Official Plan, Council will consider, and where appropriate propose, an amendment to the District of Muskoka Official Plan.”

Such amendment could be considered with regard to new technologies for sewage treatment, for example.

A.1.2.5 “The Provincial Policy Statement (2005) notes that municipal planning policy may go beyond the minimum provincial standards established in specific policies, while remaining consistent with the Policy and the Official Plan for the District Municipality of Muskoka acknowledges that more detailed policy will be developed in Area Official Plans. As a result, Township policy may, in certain situations, be more detailed in nature or reflect particular Township interests.”

For greater accuracy and transparency, perhaps the last sentence of this section should read, “As a result, Township policy is, in large measure, more detailed, prescriptive and more restrictive, to reflect the preferences of particular community interests in the Township. ”

A.1.3.1 “The policy within the Official Plan applies to all the land within the corporate limits of the Township of Georgian Bay.”

We suggest the wording of this section be modified by the addition of the following words, “except insofar as policies within this Plan are limited in scope and effect to particular community areas identified herein.”

A.1.3.4 “The Official Plan is considered to be a “living” document, which will be continually monitored and updated to ensure that the intent of the Township Vision is being addressed, community needs are being met, and the policies can be properly implemented. In addition, the policies of the Plan should be monitored to ensure that they are valid and realistic in light of prevailing circumstances, and that any new District and Provincial policies are addressed....” (Emphasis added)

With respect to the emphasized phrase, it would be helpful to add, at the end of that sentence, “Should any policies have their validity brought into question or appear unrealistic, for example, through successful legal challenge or by economic unsustainability or by enforcement incapability, Council will commission a timely analysis and consider revision to any such policies through the process of an Official Plan amendment.”

A.2.1.1 “The Official Plan represents the Township’s blue print for sustainable growth in the Township of Georgian Bay. It reflects the Township Vision and the desires of the residents of the Township, and will guide Council in making future land use decisions and preparing a comprehensive Zoning By-law.”

As noted above, certain executives of the Cottage Associations that drafted the Specific Lake Plan sections of the Official Plan have stated their opposition to the notion of sustainable growth. This position would seem to stand and conflict with the statement that the Official Plan “...reflects... the desires of the residents of the Township....”

We perceive this condition as inherent in the Community Plan construct that has been the foundation of a significant component of the draft Official Plan. If a Community Association such as the Gloucester Pool Cottagers Association submits comments such as in this submission, we expect that Township staff, consultants and Council will give them consideration along with other public submissions, on their merits.

At the September 20, 2012 special meeting of Council to consider submissions by various parties regarding the Official Plan it was noted that submissions by Six Mile Lake and Cognashene Cottagers Associations appeared to be in the nature of a working session to “tighten up” the language in their respective sections.

Where such sponsors of the Specific Lake Plan sections decide to amend the language of their respective sections, is their preference given greater standing than a comparable observation relating to section of the plan other than their particular section? To put it another way, do these sponsors have, de facto, a higher level of influence in developing policy than other members of the public or community organizations?

If this is the case, the statements made by executives of the Honey Harbour Association and others in opposition to the concept of sustainable development give rise to added concern.

A.2.1.1 f) “Section F – Waterfront – the waterfront area is recognized as a unique recreational resource and policies are provided which are specific to the shoreline including a definition of the extent of the policy area.”

The home page of the Township website makes the following statement. “Many Baby Boomers have decided to vacate their city dwellings and convert their summer home into an “all” season residence. We welcome them with open arms as their presence throughout the seasons makes functions an exciting reality.”

This reality has occurred more significantly in the Gloucester Pool area probably than any other area within the municipality.

The conversion of summer recreational retreats to all season full-time residences has been a reality in the Gloucester Pool area for several years and can be expected to continue, to meet the lifestyle and economic choices of retiring baby boomers. Perhaps some recognition of this reality would be appropriate in the Waterfront section of the Official Plan. An all season full-time residence fulfills a very different need than a recreational property and accordingly, has different functional requirements. If the statement on our Township's homepage, attributed to Mayor, is to be anything more than exaggerated puffery we should identify this significant element of social and economic transfer as a potentially major component of the Township's future. There appear to be no specific policies in the Official Plan addressing the needs of this demographic segment.

A.2.2.1 “Boundaries between areas designated or illustrated on any Schedule to this Plan are approximate only. They are not intended to define the exact location or extent of such areas except when they coincide with roads, railroads, transmission corridors, watercourses or other easily recognizable physical features.”

As it is the goal of the Official Plan to support predictable decision-making, the approximations used in the schedules that form part of this Plan would seem to be unnecessarily vague. We suggest that such schedules show definitive boundaries before the Official Plan is finalized, in sufficient time to permit public comment. As different policies apply to different community areas within the municipality, it would be particularly relevant to an owner of property close to an approximate boundary to know which regulations applied to his or her property.

A.2.2.2 “The boundaries of each Community as shown on Schedules D to H have been specifically located, and primarily correspond to property boundaries or an environmentally sensitive area. Any refinement other than a minor adjustment will require an amendment to this Plan.”

The wording of this section stands in contradiction to the wording of the preceding section A.2.2.1

A.2.2.3 “As more specifically detailed in this Plan, the boundaries and entities identified on Schedule I-1 (Active Transportation Loops) are general in nature. This Schedule is intended to act as an indicator of values, influences on, or constraint to development which may require further confirmation and evaluation, and which must be considered and read in conjunction with the applicable policies of this Plan.”

See comments regarding A.2.2.1 above.

A.2.2.5 and A.2.2.6

See comments regarding A.2.2.1 above

A.2.2.7 “Individual policies should not be read or interpreted in isolation. ... Specific cross-reference notations between policies in the Official Plan have generally not been made.”

The omission of specific cross-referenced limitations between policies adds to the uncertainty and unpredictability or transparency of decision-making, to say nothing of difficulty and confusion the confusion it creates for the reader. We request that specific cross-reference notations be made not only between and among policies of the Official Plan but also to the Planning Act, the 2005 Provincial Policy Statement and the District of Muskoka Official Plan.

A.2.2.8 “Where lists or examples of permitted uses are provided in the Official Plan, they are intended to indicate the possible range and type of uses that are to be considered. Specific uses which are not listed, but are considered by the Township to be similar to the listed uses and to conform to the intent of the applicable land use designation and the Official Plan, may be recognized as a permitted use.”

This vague language leads to unnecessary uncertainty and unpredictability to say nothing of conflict in decision-making. To improve the reader’s ability to predict the potential outcome of a contemplated undertaking, it would at least be helpful to set out the criteria underlying the permitted uses. If such criteria have not been established there can be no compelling basis for formulating policy as it would indicate potential arbitrariness in application. In cases where dimensional requirements may be relevant, perhaps formulaic solutions would be of significant assistance and avoid the arbitrariness of specific dimensions which may have questionable relevance depending on the nature and size of the property at issue.

B.2.3.1 “To recognize and build upon the pattern of land use in the Township by accommodating compatible land uses and sustainable growth within the existing communities, waterfront, and rural areas.”

This goal appears to be at odds with sections of the Plan, particularly the Specific Lake Plan sections, as the restrictive development criteria would simply not allow the development of structures comparable to those already existing particularly, those in the Cognashene community area. Perhaps the language should be amended by adding the words “subject to the constraints of the Specific Lake Plan sections herein”, at the end of the sentence.

B.2.3.5 “To conserve the waterfront as a valuable resource and accommodate development which respects the basic character and traditional mix of uses, and maintains the natural aesthetic qualities of the area.”

It would be helpful to characterize the nature of this resource. In section A. 2.2.1 f) the waterfront resource is characterized as recreational. Is this waterfront resource different; if so in what way?

C.1.1 “The strategy for long term sustainable growth in the Township is based on the recognition of the important role the natural environment plays in the physical, social and economic development of the Township. For growth to be sustainable, the impacts of growth must be managed to ensure that there are no long term negative impacts to the natural environment”

In our view, all development carries some risk of impact, negative impact through greater consumption, more activity more waste more use of facilities etc. or positive impact by reducing travel time, by improving waste disposal facilities, by replanting and rehabilitation of polluted sites, for example. No measurement of environmental impact can be absolute. Absolute terminology such as the words “no...impact” in this context could be seen as arbitrary or to offer a barrier to development that could be subject to arbitrary use by those charged with applying the implementing by laws. We suggest the wording of the last sentence be amended by replacing the words “no long term negative impacts” with the phrase “no long term significant net negative impacts.

C.1.2 “Growth and development should also build on the existing character and pattern of land use in the Township by accommodating compatible land uses within the existing urban centres, communities, waterfront, and rural areas. Development within the Township needs to be managed to ensure that the fundamental features of the municipality are maintained as population and employment growth occurs. Urban Centres will be the focus for permanent population and employment growth and they will continue as the focal points for a range of business, service, and facilities which serve the community and the surrounding area.”

This might be an opportune place to acknowledge the growth of the conversion of cottages into permanent residences.

It could be argued in this section that certain fundamental features of the municipality will not be maintained, as the restrictive provisions of the Specific Lake Plans will likely preclude the construction of the larger recreational and multi-million-dollar “cottages” that exist in plain sight of property owners with undeveloped lots on the eastern Georgian Bay shore and islands

C.1.3 “The character of Urban Centres, Communities, Waterfront and Rural areas is the essence, which defines the Township and provides a sense of identity. Character is established over time and is rooted in the following:

a) physical setting and landscape characteristics;

- b) historic development;**
- c) cultural heritage; d) extent and form of development;**
- e) density, intensity of use and height;**
- f) architecture and design;**
- g) level of services and infrastructure; and**
- h) open space, natural areas and recreational areas and facilities.”**

“Character” is a term used 147 times in the Official Plan. It is a subjective concept and if it is to form a significant structural element of the fabric of the Official Plan it should at least be defined in the Glossary of Terms in Section J. The definition should include particular criteria such as are used in Section C.1.3. If necessary and appropriate the criteria should be restated at the beginning of each relevant section. In order to facilitate an understanding of Official Plan’s objectives in certain sections, helpful to list the criteria in order of their significance to the particular areas covered by the respective sections of the Plan

C.1.4 “The character of an Urban Centre, Community, Waterfront, or Rural designations is not static, but rather evolves over time, adapting to new circumstances. Development will be managed to ensure that the character and fundamental features of the designation are maintained. As the area grows, development, which is compatible with and complements this character, should be fostered.”

In our view this section contradicts itself. How can the non-static, evolving and adapting character of the various land designations be managed to ensure that the character is maintained. This is saying character is not static but development will be managed in some way to ensure that it is static. We would like to offer a suggestion for rewording this section but are unsure which takes priority, the non--static evolving nature of character or the development management strategies that will maintain the character the status quo.

In an effort to understand how another municipality with similar issues addressed this subject matter we consulted the Lake of Bays Official Plan and found that it read as follows:

“The character of a community or the rural and waterfront designations is not static, but rather evolves over time, adapting to new circumstances. Development will be managed to ensure that the essence and fundamental features of the designation are maintained. As the area grows, development, which is compatible with and complements this character should be fostered.”

If our consultant and planning staff are to plagiarise another municipality's Official Plan one would hope that they might at least check that it makes sense first.

C.2.1 "The Township of Georgian Bay is projected to have a permanent population of 3,900 people by 2031. The seasonal population is projected to be 16,900 for a total projected population of 20,800 people by 203 (sic)"

As noted by another public submission, these figures stand in conflict with the projections used for the Township's Ward boundary review. Regardless of which projections turn out to be more accurate, it is unclear from a review of the Official Plan what substantive purpose these projections serve. They do not appear to be used in any formulaic way in advancing policy in the various following sections of the Plan. It would be helpful to explain the significance of these projections in the Official Plan environment. And provide examples of what planning policies might turn on the figures so readers can gauge the consequences of ranges of imprecision in the projections.

C.2.2 "The Township of Georgian Bay will accommodate sustainable growth by: a) planning for a permanent population of 3,900 people and a seasonal population of 16,900 people by the year 2031; b) planning for total employment of 1,800 jobs by 2031;"

Provision of 1,800 jobs for a population of 3,900 people is a ratio of 46%. That means, in 2031 should these figures bear out, almost one in two members of the permanent population will be employed in the municipality. Perhaps it would make these figures more meaningful if some insight was offered about how that particular employment level was derived. We know from existing demographic studies by 2031 one out of every three people in Canada old enough to be eligible for the workforce will be retired. In the Township of Georgian Bay growth is more likely to be fed by people already of retirement age so in our case likelihood is that one out of two may well be a realistic estimate of the available workforce. Is it then realistic to expect that all or close to all the eligible workers resident in our municipality will find employment here?

It seems speculative at best to posit that the Township will have achieved its sustainable growth objectives by providing 1,800 jobs by 2031.

C.2.3 "The majority of permanent population growth will be directed to existing Urban Centres and will be planned to occur in the following manner:

a) Approximately 80% of all new population growth is expected to develop on full services;"

If there is some factual underpinning for this statement it would be helpful to present it. If there is none, perhaps it should not be stated. As noted elsewhere, a component of growth in our community has been and will continue to be conversion of part-time residents to full-time residents. We expect that these conversions will predominantly not be on full services.

C.3.1 “Growth and development within the Township will be guided by the following principles: ...

d) Rural land use and development will be planned in a manner that protects significant natural heritage features and systems, and encourages the wise use or management of natural resources and, resource-based recreational activities;”

In this section and in other places the term “wise use” of resources is employed. The term is subjective and open to a range of possible interpretations. Perhaps it would be wiser to identify objective criteria whose attainment would represent “wise use”. Also, “resource-based recreational” is a term with uncertain meaning. In this case perhaps examples would suffice.

C.3.1 g) “Businesses, which provide employment opportunities and effectively use the skills and initiatives of existing or potential residents, will be encouraged;”

While foresight is a quality to be admired, it seems to have reached the level of clairvoyance in this section. Would that we had the foresight to encourage businesses that will effectively use the skills and initiatives of people who are yet to move to our community. Perhaps the words, “or potential” should be reconsidered

C.4.1 “The settlement pattern of the Township of Georgian Bay has long been established as low-density waterfront and rural development surrounding a few small urban communities. Each area possesses its own function, development form and natural heritage features. The support and continuation of this basic development pattern will assist in preserving the character of the Township and the lifestyle it offers.”

We suggest replacing the words “a few” with “three”. This section creates the impression that little has changed in the municipality over a long time. In the broadest sense this may well be true; however, in the area bordering Gloucester Pool and Little Lake, there have been perceptible changes in the size of buildings, nature of architecture, and consequent value of properties.

We also consulted the Lake of Bays Official Plan to see how it addressed this policy statement. It reads as follows

“The settlement pattern of the Township of Lake of Bays has long been established as low-density waterfront and rural development with a number of small communities. Each area possesses its own function, development form and natural characteristics. The support and continuation of this basic development pattern will assist in preserving the character of the Township and the lifestyle it offers.”

When plagiarizing another municipality’s Official Plan one might expect, once again, that the consultant and or planning staff responsible for the draft would take care to tailor the language to best suit Georgian Bay Township.

As the inventory of vacant property has diminished, so new development has given way to redevelopment. While this does not significantly affect distribution or density, it does affect expectations. It would be a fruitful exercise for the authors of this draft to review the annual value of building permits issued for the area around Gloucester Pool over say the last 20 years, given that this is the term of the current draft’s outlook. 20 years ago a \$1 million building permit was unheard of, today while it may still not be routine, it is a lot more common.

This might also be a convenient place to acknowledge the conversion of seasonal to full-time residences. It is our presumptive conclusion that as there is no acknowledgment of this phenomenon in the Official Plan, there has been no attempt measure its significance. As we presume it is not been measured, we also presume its effects have not been considered. At least there appears to be no evidence from a review of the draft that it has been considered.

In 1977, the Canada-Ontario-Rideau-Trent-Severn Committee Committee’s Interim Land Use Guidelines Committee identified conversion of seasonal cottages to permanent homes as a concern due to the lack of affordable seasonal cottages as well as the increased pollution loading of the waterway. The Committee recommended that all new seasonal development applications be reviewed against permanent development criteria, unless it could be demonstrated by the developer that the development will remain seasonal in use. A survey administered by the Federation of Ontario Cottagers’ Associations in 2007 for Cottage Life Magazine indicated that more than 60 per cent of cottages were then being used year-round. East and Chamberlain (2004) reported a 30 per cent increase in permanent residents along the Trent Severn Waterway from 1986 to 1996 whereas the population within the municipalities bordering the waterway increased by approximately two per cent between 1996 and 2001 (East and Chamberlain, 2004). Catalyst Environmental Group (2007) noted that the traditional,

modest, seasonal cottage is being replaced by modern homes that emulate urban amenities (lawns, paved driveways, larger buildings, etc.). Once used for just a few weeks a year, cottages are evolving into weekly rentals, and permanent or retirement homes (Catalyst Environmental Group, 2007). (Shoreline Policy and Regulation: Review and Recommendations 2011 p.23)

Much of the magnitude and character of shoreline development along the TSW is driven by the growth rate and nearness of the Greater Toronto Area (GTA). The Ontario Ministry of Finance estimates the population of the GTA will increase by nearly 50 per cent from 6.1 million in 2009 to 9.1 million in 2036. By 2028, 50 per cent of Ontarians will live in the GTA. During the same period, the population of Central Ontario, the census division that the TSW occupies, will grow by more than 24 per cent and maintain a 21.5 per cent share of the provincial population (Ontario Ministry of Finance, 2010). (Shoreline Policy and Regulation: Review and Recommendations 2011 p.22)

Many municipalities bordering the TSW will experience this growth, which coupled with an influx of retirees, will increase the demand for new shoreline development, the conversion of seasonal cottages to permanent waterfront residences and the use of the waterway for near-urban recreation (Shoreline Policy and Regulation: Review and Recommendations 2011 p.22).

Many cottage owners have in recent decades reached retirement age, and many have renovated their small lake side retreats into permanent homes. This trend has continued and many of the once quaint cottages have been replaced by large, suburban-style houses. (Shoreline Policy and Regulation: Review and Recommendations 2011 p.22)

We suggest that it is an issue worthy of study specific to the Township of Georgian Bay given the massive aging population two hours to the south. While do not maintain statistics of our membership by age, anecdotally we know our own membership is aging. We would be pleased to support the study of this phenomenon should the Township wish to survey the Georgian Bay Township component of our membership.

C.4.3 “Development may be accommodated in appropriate locations within each of these areas, provided that it is consistent with the goals, objectives and policies of this Plan.”

We suggest that the words, “Development may”, being replaced by “Development will”. If development is not accommodated in these areas a fundamental objective of the Official Plan will not be met.

C.5.3 “The Waterfront designation generally encompasses the land outside of a Settlement Area, Urban Centre and Community, which surrounds and relates, either physically or functionally, to substantial lakes and rivers. Section F of this Plan specifically defines the extent of this designation and provides detailed policy respecting development within the waterfront designation.”

The phrase, “ which surrounds and relates, either physically or functionally, to substantial lakes and rivers.” is unreasonably vague. We note that no map has been developed identifying land designated as Waterfront. It begs the questions, what constitutes a functional relationship with a substantial lake or river, what is the substantial lake or river? Does a back lot on a stream feeding the lake or river qualify as waterfront? Does 100 acre rural parcel with wetland draining into a lake or river qualify as waterfront? Until such questions can be answered and the property designated the vagueness of the description undermines the authority of the policy.

C.5.4 “The Rural designation includes the hinterland beyond the boundaries of the Settlement Areas and Waterfront designations, as well as land which is not subject to any other designation of this Plan. Detailed policy respecting the Rural designation is found in Section G of this Plan.”

As the rural designation is the catchall after identification of Settlement areas, Specific Lake Plans and Waterfront, it follows that until such time as the Waterfront is specifically identified and mapped it will be unclear where waterfront ends and rural begins.

This mapping appears to us to be crucial in order to ensure predictable open and integrated decision-making. If it is left undefined it implies that the objective was not worthy at the outset.

D.1.1.3 “The natural heritage features policies of this section apply to:

- a) Significant Habitat of Endangered Species and Threatened Species;**
- b) Provincially Significant wetlands;**
- c) Regionally Significant wetlands;**
- d) Provincially Significant coastal wetlands;**
- e) Significant wildlife habitat;**
- f) Areas of natural and scientific interest (ANSI); and**
- g) Fish habitat”**

Of the above categories, one, c) Regionally Significant wetlands, is not a defined term. If this category is sufficiently significant to identify, it surely must be sufficiently significant to define. The term appears again in section **D.1.4.3** where it is italicized, implying that it is in fact defined in Section J, Glossary. There is no definition of Regionally significant wetlands in Section J.

It is also unclear, as no maps are provided, whether there are in fact any designated Regionally significant wetlands in our municipality at present. If, in fact, none exist, perhaps the term should be removed or its inclusion should be explained. In any event, some explanation of its significance would be helpful.

D.1.2.1 The environmental and natural areas within the Township are to be determined in consultation with the Ministry of Natural Resources, the District of Muskoka, and/or through production of impact studies as provided for in Section I.2.2 (Impact Assessments) and technical reports.

It would be helpful, particularly for the area surrounding Gloucester Pool, to explain the role of the federal government through Parks Canada and the Trent Severn Waterway. By way of example, the February 2011 report, Shoreline Policy and Regulation: Review and Recommendations, whose preparation was coordinated by Parks Canada, makes the following observations regarding the jurisdiction of Municipalities;

“Within their respective municipal boundaries along the waterway, municipalities have jurisdiction over Planning Act applications, including severances, zoning amendments and minor variances. Municipalities also have the authority to enact other by-laws outside the purview of the Planning Act, such as site alteration by-laws for which permits are required. Municipal approval in the form of a building permit under the Ontario Building Code is required for construction of boathouses and other buildings above the waterway’s UCNL.” (Upper Controlled Navigation Limit) (Shoreline Policy and Regulation: Review and Recommendations 2011 p.8)

D.1.2.2 “New natural feature areas may be identified during development applications, or through other inventories or evaluations. The policies of this Official Plan shall apply to these areas.”

As such areas are currently unknown and this creates unpredictability in the land use decision making process; it would be helpful to identify the process for such identification. Is it foreseen that the municipality would conduct any such inventories or evaluations? Is this a provincial or federal government role? In the course of development applications is it the responsibility of the

proponent or of the municipality to identify such areas? If it is the responsibility of the proponent, what happens if the proponent, through an appropriately qualified professional, identifies a relevant feature? Is the proponent or the professional retained by the proponent legally required to make the municipality aware of such discovery? In the interests of reducing unpredictability, or perhaps circumscribing the range of unpredictability, it would be helpful to provide an example or perhaps two of how a development application would address previously unknown natural feature areas.

D.1.2.4 “It is a policy of the Township that the conservation of the overall natural landscape, tree cover, and vegetation shall be encouraged in an effort to preserve the natural appearance, character, and aesthetics of the area and to provide a natural buffer, particularly in the area along the shoreline. Enhancement of the natural and man-made environment should be incorporated within any development or redevelopment proposal.”

This focus of this statement is on the natural appearance, character and aesthetics. Is there no environmental benefit to conserving the natural landscape? We would have thought such concerns would trump appearance and should be the dominant reason for maintenance of natural landscape.

The meaning of the last sentence is vague and we suggest the sentence be continued with the word, “by” followed by examples of how the natural or man-made environment might be enhanced.

D.1.2.5 “Where natural vegetation has been artificially altered in a manner which is not environmentally sound, and where feasible, regeneration of vegetation cover or buffer using native species will be encouraged.”

By contrast this statement implies there are environmental reasons for encouraging the maintenance of the natural landscape. It would be helpful to either define or describe the intended meaning of the word “buffer” in this context.

D.1.2.6 “Where a natural vegetative buffer is required by this Official Plan, the removal of existing vegetation, including the ground, shrub or canopy layers, or the disruption of the natural landform or surface soils will be restricted.”

Again to enhance predictability of decision making it would be helpful to indicate the criteria governing the application of such restriction. Would this apply to the entire lot or just to the waterfront buffer area?

Vegetative buffers are one of the elements of focus of site plan control agreements. As all Waterfront is subject to site plan control (I.5.1.1. c)) does this mean that all waterfront property is subject to this policy?

In our view this seems to be an imprecise, unnecessary and unreasonably overbroad policy given the objective which we presume is simply to conserve the natural resources of the community

D.1.2.7 The use of chemicals, compounds, pesticides, and nutrients for the treatment of land or vegetation, whether in or out of the water, will be discouraged, banned or prohibited as based on Municipal by-laws.

In years past there have been significant infestations of caterpillars (tent and gipsy moth) that resulted in significant damage to the natural canopy including the loss of significant numbers of oak and other deciduous trees. During peaks of these infestations aerial chemical sprays were widely used as a containment strategy. Our natural tree canopy is also subject to attack by several invasive insect species. OMAFRA has endorsed the use of a specific systemic pesticide to contain the damaging effects of several insect pests. Accordingly it might be appropriate to add to the sentence the following words, “subject to the need from time to time to evaluate the use of pesticide treatments approved by authorized provincial agencies in the management of invasive and other indigenous species that attack and kill our native trees.” or similar language.

D.1.2.8 “Natural watercourses should be retained in their natural form. Prior to the alteration of a watercourse, approvals shall be required from the applicable authority.”

“Natural watercourses” is a vague term that has not been defined in Section J Glossary. In order to limit the unpredictability of decision making we suggest this term be defined in the context of the Official Plan. Many properties in our municipality have intermittent springs and other sources of seasonal runoff. It will assist in predictable decision-making to know whether or not such seasonal runoff would be classified as a natural watercourse foods alteration requires approvals. It would also be helpful to identify the range of relevant authorities whose approval would possibly be required.

D.1.2.9 “Connecting natural areas though the use of linkages between natural features shall be encouraged.”

We do not understand what this sentence means. In particular, we do not understand the meaning of the word “linkages” in this context. Does it mean pathways, waterway, trails? Is also unclear what desirable outcome might be achieved through such connections. Some amplification of this notion might be helpful.

D.1.2.10 “Existing agricultural uses shall not be limited by the policies of Section D1 (Natural Heritage) of this Plan.”

Does the phrase, “existing agricultural uses,” means agriculture in a commercial context or does it include planting of crops for personal consumption. Many property owners in our community routinely plant gardens and there has been discussion of the potential for development of community gardens to provide locally produced vegetables for the benefit of local families in need. It would appear that the term needs definition or amplification to clarify the meaning of this section.

D.1.3.3 “Areas of significant wildlife habitat may be identified by the Province or other agencies as additional information becomes available, upon site inspection of individual properties, as per Section I.2 (Technical Reports) of this Plan or through an impact assessment submitted with development applications.

See comments at D.1.2.2. above

D.1.3.8 “Where there is a potential for Species at Risk, the Township will evaluate whether a development application will require a “preliminary” SAR screening and many development applications may require a “detailed” SAR screening. The preliminary SAR screening will be reviewed by the Township in consultation with MNR to determine if the development application can proceed based on the preliminary screening or if a detailed screening will be required. Should a detailed SAR screening be required, it shall be undertaken by a qualified biologist. Appendix 1 (SAR Screening Checklist) of this Official Plan provides background and for criteria for screening processes.”

This section clearly states that a development application is only subject to an evaluation for a preliminary SAR screening where there is potential for Species at Risk. Appendix 1, on the other hand, states, “All development applications will undergo a preliminary screening by the Township.” We suggest that the appendix, which does not form part of the Official Plan, be amended to conform to the direction in this section.

It would be helpful in enhancing the predictability of this potentially unpredictable situation to indicate whether the proponent or the municipality will bear the costs of the preliminary and detailed screening procedures.

It would also be helpful to lay readers to explain the acronym ESA used in Appendix 1. We presume it stands for Endangered Species Act.

D.1.3.9 “Generally, extensions to existing development will be exempt from the requirement for SAR screening.”

Given the previously noted trend of conversion of season to permanent residences, it would be helpful to understand the criteria, if in fact there are any, to distinguish between extensions to existing development and redevelopment of an existing site. This clarification would likely be of significant assistance to property owners considering how a contemplated conversion might be undertaken.

D.1.4.2 “The location of Provincially significant coastal wetlands, Provincially significant wetlands and Regionally significant wetlands shall be determined by the Ministry of Natural Resources and the District of Muskoka. To date, twelve Provincially significant wetlands have been identified by the Province. These are identified in Appendix 2 (Provincially Significant Wetlands) to this Official Plan and shall be used as reference information. Specific wetland boundaries shall be obtained from the Ministry of Natural Resources and the District of Muskoka as applicable or as verified through the submission of an acceptable impact assessment.”

This section indicate that 12 provincially significant wetlands have been identified by the Province. Appendix 2 contains 18 different maps identifying Provincially Significant Wetlands. It would be helpful to resolve this apparent inconsistency.

We noted earlier that the term, “Regionally significant wetlands” was not a defined term. We now see some potential ambiguity as to the identification of the appropriate agency with authority to designate “Regionally Significant Wetlands”. It would be helpful to clarify if this authority is the Ministry of Natural Resources or the District of Muskoka, or both.

This section implies that the specific boundaries of Provincially significant wetlands are in the possession of the Ministry of Natural Resources and perhaps, in the case of “Regionally significant wetlands” in the possession of the District of Muskoka. To assist in reducing uncertainty, it would be helpful to clarify which agency holds which boundary information. It will also be helpful to understand where any “Regionally significant wetlands” exist in our Township.

Also see comments at D.1.2.2. above.

D.1.4.3 “Additional Provincially significant coastal wetlands, Provincially significant wetlands or Regionally significant wetlands may be identified through the evaluation procedures established by the Ministry of Natural Resources or the District of Muskoka using the applicable evaluation procedure. Any newly evaluated wetland shall be subject to the policies of this Official Plan.”

In this and all other cases where newly evaluated areas of potentially limited use are identified, it would be helpful for the Official Plan to indicate the timeliness and means by which this information will be communicated to the citizens of the municipality.

It would also be helpful in the interests of predictability to have publicly available information regarding any such evaluations in process or in prospect.

Given the probable extension in delays that are likely to arise through the increased requirement for impact studies, screenings, evaluations etc. as set out in this draft, possibility of changed circumstances between initial application and completion of its evaluation may well become a likelihood. Accordingly, some direction in the Official Plan regarding the consequence of changes occurring after an the initial application is filed would be helpful.

D.1.4.4 “Council may consider site specific policies respecting unevaluated wetlands though (sic) the development review process or other policy review.”

We would draw your attention to the typographical error identified in subsection. This section, like others containing similarly permissive powers of Council increases uncertainty and reduces predictability. At least, consider identifying the criteria to which Council would refer in its possible consideration of site specific policies respecting unevaluated wetlands.

D.1.4.5 “Uses which are compatible with wetlands may be permitted. Conservation and educational use of wetlands will be encouraged where feasible and desirable provided that there will be no negative impact on the natural features or ecological functions of the wetland. Compatible land uses may include but not be limited to boardwalks, signs, trails, and benches.”

We question the use of the subjunctive in this section. It might just as well be stated, “uses which are compatible with wetlands may or may not be permitted”. We suggest the word, “may”, be changed to, “will”, otherwise uncertainty has trumped predictability once again.

D.1.4.6 “Development and site alternation (sic) shall not be permitted in Provincially significant wetlands and Provincially significant coastal wetlands.”

We would draw your attention to the apparent typographical error in this section.

The Gloucester Pool Wetlands, an area designated as Provincially significant wetlands, were so designated in 2011. No notification, of which we are aware, was made available to any property owners that such designation had occurred, had been in process or had even been contemplated. We believe it would be of significant interest to property owners be made aware of the process for evaluation of wetlands and, in particular to be advised of any contemplated evaluation adjacent to their properties. In

Should this policy persist, it seems probable that any property owner whose land abuts Provincially significant wetlands will see unable to construct a dock. In many cases, docks already exist in Provincially significant wetlands. Would the term “development” be deemed to include the renovation of a dock that might otherwise present a danger to anyone attempting to use it?

Without the ability to use a dock a property owner would likely moor a boat in the shallow lakefront or alternatively pull the boat onto dry land with the consequent damage to the habitat. This proscription against all development, which we agreed to include the construction of docks, appears to us to be overbroad and we believe it fails to consider the potential detriment to the environment compared to a potential benefit derived from the construction of a dock that would provide habitat.

D.1.4.7 Prior to development or site alteration occurring on lands within 120 metres of a Provincially significant wetland or Provincially significant coastal wetland, an impact assessment as per Section I.2.2 (Impact Assessments) shall be submitted to the satisfaction of the Township and MNR demonstrating that there will be no negative impact on the natural features or ecological function of the wetland.

The Ministry of natural resources recently published a guide, ***“Evaluated Wetlands Along the Eastern Georgian Bay Coast: What they are and what they mean to private landowners.”***

This guide makes the following statements,

“The PPS (Provincial Policy Statement) also requires consideration for the lands adjacent to a PSW (Provincial significant wetland). The PPS states that prior to any approvals under the Planning Act being issued for lands adjacent to a PSW, the ecological function of the adjacent lands must be evaluated and it must be demonstrated that there will be no negative impacts on the natural features or the ecological functions of the PSW. This is usually done through a scoped environmental impact study carried out by a biologist or ecologist qualified in wetland evaluation.

MNR’s Natural Heritage Reference Manual recommends that generally lands within 120 metres of a PSW be considered “adjacent lands”.

The issuance of building permits is not a Planning Act approval so building within the 120m adjacent lands usually does not require an environmental impact study by the landowner. Rezoning and lot creation are Planning Act approvals”.

We read this MNR guide to stand in conflict with the draft policy above which appears to require a property owner to submit an impact assessment to the satisfaction of... the MNR prior to any development that would include construction of the building, to occur. We suggest this section be clarified to eliminate any incorrect inference that may be drawn from it by eliminating any ambiguity regarding the nature of development for which MNR approval may be required. If it is intended policy of the Official Plan to require an impact assessment prior to any development on lands adjacent to a Provincially significant wetland, it would be helpful to identify which type of development would require municipal approval in which would also require MNR approval.

D.1.4.8 Prior to *development* or *site alteration* occurring on lands within 30 metres of other *wetlands*, an *impact assessment* as per Section 1.2.2 (*Impact Assessments*) may be required to be submitted to the Township which demonstrates that there will be no *negative impact* on the natural features or ecological function of the *wetland*.

The term, “other wetlands” is not defined. In order for this section to be applied, we believe it must necessarily be defined. In particular, does it include, “Regionally significant wetlands”? If it does include “Regionally specific wetlands”, we would ask again is there any particular significance to the category of “Regionally specific wetlands” as it would appear to be indistinguishable from, “other wetlands”.

As in other cases, this section gives the permissive authority to the Township to require an impact assessment. As in other cases this section could as well be worded to read, “... [which] may or may not be required to be submitted to the Township...”. This construction creates uncertainty and reduces predictability. As in other cases we suggest that at the very least, the Official Plan disclose the criteria to which Township would refer in deciding whether or not to exercise this authority. To do otherwise would invite criticism on the grounds of vagueness, arbitrariness and potentially overbreadth.

D.1.5.6 “... The Township may require an impact assessment for development of lands which are beyond the adjacent lot where it is deemed appropriate in a site specific case but shall generally not be required for single unit development beyond the adjacent lot.

As in other cases of permissive authority, we suggest the disclosure of criteria which the Township would refer in deciding whether or not to exercise this authority.

D.1.6.6 “Prior to *development or site alteration* occurring on lands within 120 metres of a Type 1 or unknown *fish habitat* or 300 metres from an inland lake trout *fish habitat*, an *impact assessment* as per Section I.2.2 (*Impact assessments*) shall be submitted to the satisfaction of the Township and the applicable authority demonstrating that there will be no *negative impact* on the natural features or ecological function of the habitat or except in accordance with Provincial and Federal policies and regulations.”

We read this section have the practical implication of requiring an impact assessment on any waterfront development or site alteration contemplated in the municipality. Type I habitat is pervasive and unknown fish is habitat is everywhere water exists that has not been mapped. This implies that a property owner would require an impact assessment before being allowed to grade a driveway, take delivery of a load of topsoil for a garden, clear leaves that have blocked a culvert, dig a drain or swale to divert run off a way from a residence.

In our view, this policy is simply impractical. The municipality would not have the resources required to process hundreds upon hundreds of applications site alteration and development that it would require.

We object to the overbroad character of this policy. It is disproportionately restrictive in comparison to the objectives we presume it seeks to achieve, namely, protection of fish habitat. We seriously recommend reconsideration of this policy. As the section requires impact assessments to be submitted to the satisfaction of the Township and makes no mention of the requirement to satisfy the Province or Federal Government, we presume this policy to be an initiative of the Township rather than any other government agency.

This is the point our analysis reached on October 8, 2012. We propose to continue and will submit our further comments as comments on the second draft.