

Issues and Options Report

Issues and Options Report
 Tourist Campgrounds
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Prepared for Township of Rideau Lakes

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1.0 Introduction

The Township of Rideau Lakes approved an Interim Control By-law (ICBL) related to the establishment of new campgrounds as well as expansions to existing campgrounds within the Township on August 5th, 2021. This ICBL was passed because Council was concerned with the adequacy of current policies and regulations which were perceived to have been developed on the conception that tourist campgrounds were a seasonal form of accommodation. Following the passing of the ICBL, a land use study was required under the Planning Act and Fotenn was retained to carry out this study. The first Phase of this land use study has been completed. Phase 2 began with the issuance of a Draft Issues and Options Report and will conclude with a Council vote regarding the recommendations contained in this report. We note that the dialogue with stakeholders is not finished with the completion of Phase 1 and that all stakeholders are encouraged to continue the conversation through their review of this and future documents. An open house regarding this draft report was held in February of 2022 for the purpose of soliciting additional feedback and continuing the conversation with stakeholders.

Phase 1 consisted of an information gathering exercise which included meetings with regulatory agencies, and stakeholder workshops with the general public, campground operators, and lake associations. Surveys were made available through the Township's website during this phase with comments also being provided via email. The primary intent and purpose of Phase 1 was to ensure the consultant team received detailed feedback and commentary on a wide range of issues and potential options as they relate to tourist campgrounds within the Township.

This Issues and Options Report presents the issues as we have heard them, as well as a number of options intended to respond to and address those issues. This report concludes with recommendations derived from the presented options. This report will also inform the final land use study, planned to be completed in the spring of 2022, which is anticipated to culminate with amendments to Township policy and regulatory tools in relation to tourist campgrounds.

1.1 Background

In July of 2021, Fotenn prepared a background report regarding tourist campgrounds at the direction of Council. The background report identified that tourist campgrounds were the subject of nuisance complaints in recent years and that a select few of the tourist campgrounds in the area generated a majority of these complaints. These complaints suggested a closer examination of the existing campgrounds was needed to determine if the sources of nuisance impacts and compatibility concerns such as noise from campsites, special events, mechanical equipment, or vehicles, could be addressed through land use planning tools or other regulatory tools available to the Township and to identify any other issues that were not unearthed by the background study. Additionally, the background report explored the implementation of an Interim Control By-law which would see a pause in the development of tourist campgrounds to allow the Township to undertake further study and implement any policy and regulatory changes deemed necessary, however, the background study did not endorse this recommendation.

The Township of Rideau Lakes approved an Interim Control By-law related to the establishment of new campgrounds as well as expansions to existing campgrounds within the Township in August 2021. Under the Planning Act, when an Interim Control By-law is passed, a municipality is required to undertake a land use study to examine the matter that led to its passing. In September 2021, Fotenn was retained to carry out this land use study on behalf of the Township.

Council's goal as expressed to the consultant team is to complete the land use study as expeditiously as possible, with the aim of having it and any associated changes approved within six months to ensure the changes go into effect prior to the 2022 tourism season to limit potential delays for campground operators. The timeline has been adjusted to provide greater opportunity to consult with the public, including seasonal residents as they return in the spring, therefore the study is anticipated to be completed in spring 2022.

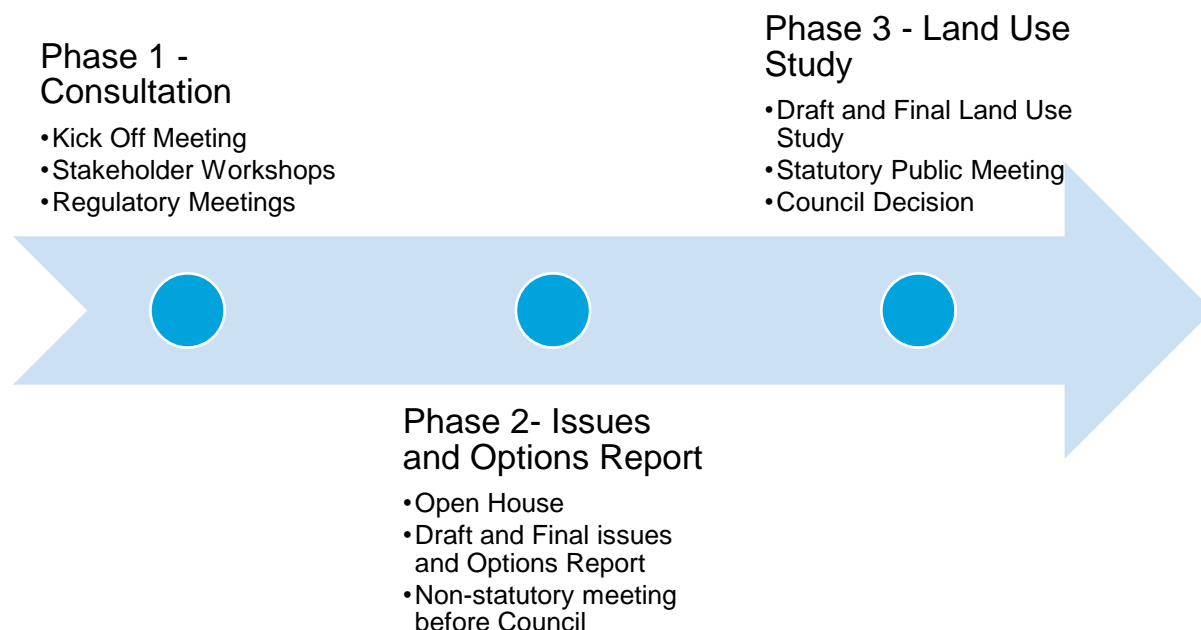
1.2 Process

This land use study is to be completed in three phases. The first phase was focused on consultation and information gathering. Phase 1 began with a Kick-off Meeting with Township Staff, site visits with three tourist campgrounds to improve the project team's understanding of their operational considerations, meetings with regulatory authorities and agencies, and workshops with three stakeholder groups: lake associations, campground operators, and the general public. The information received by all parties in Phase 1 laid the foundation for the proceeding two phases. At the outset of Phase 1, a page on the Township's website was created which identifies the project objectives and process. Surveys for the lake associations, campground operators, and the general public were hosted through this website and draft and final documents are posted through this website as they become available.

The second phase of this land use study is the preparation and finalization of the Issues and Options Report, which is planned to occur from November 2021 to March 2022. Phase 2 began with the preparation of a Draft Issues and Options Report and was followed by a public posting of the draft report and an open house where the issues and options were presented to the public for comments. The Issues and Options Report was revised and updated pursuant to the feedback received at the open house and the revised document was posted online for further public comment prior to being presented to the Planning Advisory Committee at a non-statutory public meeting. The purpose of this meeting was to solicit further feedback from the public on the revised report as well as to seek Council's direction. This final version of the Issues and Options Report consolidates the findings of the study to-date which includes a background policy review, presentation and discussion of the issues as identified through the consultation process, and presentation of preliminary options and how they are intended to respond to the identified issues. This report also identifies the options that we recommend to Council for action.

The third and final phase of this study consists of the land use study and is expected to take place during the spring of 2022. Phase 3 will consist of multiple stages, the first of which is the preparation of a draft land use study. The land use study will build on the Issues and Options Report by providing further discussion on the Council-preferred options along with an implementation plan. It is anticipated that Council direction at the last stage of Phase 2 will require the preparation of amendments to the Official Plan, the zoning by-law, and/or other regulatory tools. Should that be the case, the land use study will also include a planning rationale for the proposed amendments as well as including draft amendment text. Township-initiated amendments to the identified policy documents will be initiated at this time as well. The draft land use study and draft amendments to policy and regulatory tools will be presented at a statutory public meeting before the Planning Advisory Committee under the Planning Act. The documents noted will be posted online a minimum of 20 days in advance of the public meeting to allow time for public review and comment. The statutory public meeting will provide an opportunity for the public and stakeholders to share their comments on the draft changes before Council and will also facilitate a dialogue with Council regarding the intent and anticipated impacts that would result from the implementation of any amendments. Following the statutory public meeting, the land use study and proposed amendments will be revised based on the feedback received and a final report and amendments will be presented to Council for a decision. As with the statutory public meeting, the final report and amendments will be posted online for stakeholder review and comment in advance of the Council meeting. It is anticipated that Council will decide on the amendments at this Council meeting, which would result in changes to policy and regulatory tools.

As the Planning Act provides for and in fact requires ongoing monitoring and regular updates to the Official Plan, and the zoning by-law by extension, the impact of the changes will be monitored by Township staff. Stakeholders will be encouraged to continue to share their feedback with Township staff and Council to allow for further refinements and adjustments over time, particularly in response to any unanticipated outcomes.



1.3 Regulatory Agencies + Consultation

At the Kick-Off meeting for Phase 1, a number of regulatory agencies with areas of influence that may impact tourist campgrounds were identified and meetings with these agencies were subsequently arranged. The agencies identified are as follows:

- Parks Canada
- Ministry of the Environment, Conservation and Parks (MECP)
- Ministry of Northern Development, Mines, Natural Resources and Forestry (MNRF)
- Cataraqui Region Conservation Authority (CRCA)
- Rideau Valley Conservation Authority (RVCA)
- Chief Building Official and Manager of Development Services of the Township of Rideau Lakes

During these meetings, the role of authority including their jurisdiction and regulatory roles relative to tourist campgrounds were identified and discussed. This section discusses the role of the regulatory authorities that were met and outlines their jurisdiction and role as they relate to tourist campgrounds.

Following the stakeholder workshops, we received feedback recommending further consultation with the Municipal Property Assessment Corporation (MPAC) in relation to taxation and with the local Regional Tourism Organization (RTO) in relation to economic impacts of tourist campgrounds. The consultant team has elected not to pursue consultation with MPAC or the RTO for the following reasons: MPAC's assessments inform the Township's taxation process. Further discussion of taxation follows in Section 2 of this report. An RTO is a marketing organization and not a regulatory one. RTOs may collect data on economic impacts from various tourism-related activities, including tourist campgrounds, and further discussion of comments received regarding economic impacts is provided in Section 2 of this report.

1.3.1 Parks Canada

Parks Canada has many roles, including the duty to protect the cultural and natural heritage value of the Rideau Canal a UNESCO World Heritage Site as well as the historic environment associated with it. Parks Canada also has a mandate to ensure a quality visitor experience and education that does not harm the integrity of the site. The jurisdiction of Parks Canada along the Rideau Canal includes all that is "in, on or over" the Canal and ends at the upper controlled water elevation, or the high water mark, throughout the waterway. In other words, Parks Canada has regulatory authority over everything that occurs "below" the high water mark. Any use, building, structure, or development (i.e., docks, boathouses, slips, shoreline stabilization, etc.) that occurs within this jurisdiction requires a permit from Parks Canada.

In addition to its regulatory role, Parks Canada also has an interest in all development that occurs within 30 metres of the high water mark along the Rideau Canal waterway, referred to as a buffer zone. Parks Canada does not have regulatory authority over the buffer zone, but it has a particular interest in preserving the integrity of the buffer zone and so the organization works closely with municipalities, Conservation Authorities, and property owners to avoid negative impacts on the Rideau Canal. In this capacity, Parks Canada partners with Conservation Authorities through the Rideau Waterway Development Review Team (RWDRT) to review and provide comments on Planning Act applications within 30 metres of the Rideau Canal.

1.3.2 Ministry of the Environment, Conservation, and Parks (MECP)

The mandate of the Ministry of the Environment, Conservation and Parks' (MECP) is to protect public health and Ontario's air, land, water and species at risk and their habitat through enforcement of provincial environmental laws. This is accomplished in part by regulating certain activities through the issuance of environmental permissions, such as approvals, permits and/or licenses. Permissions are issued if specific standards are met and are issued with conditions (e.g., monitoring, annual reporting). Activities regulated by the MECP include, but are not limited to, certain drinking water systems, sewage and wastewater treatment systems, stormwater management systems, water takings, the management and disposal of hazardous and non-hazardous wastes (liquid and solid), pesticide use, well construction and air emissions. The MECP's jurisdiction extends across Ontario.

Sites, such as tourist campgrounds, with one or more septic systems with a combined design capacity of more than 10,000 litres per day are regulated by the MECP. Septic systems serving more than one property, regardless of size, are also regulated by the MECP. An Environmental Compliance Approval (ECA) is required prior to the construction, altering, extending and use of these septic systems regulated by the MECP. ECAs are issued with conditions to ensure that septic systems are working as intended and in a manner which is protective to the environment. Approvals previously issued by the local health unit for existing sewage systems are valid unless the system was modified. In the case where approvals are missing for one or more septic systems on a site which MECP is aware of, they will work with a property owner to ensure there is a plan for how the system will be brought to compliance, which considers the urgency of the situation. As such, a property owner may be given more or less time to bring a system into compliance.

MECP also has an interest in stormwater management, with certain stormwater systems also requiring approval as they have the responsibility to protect water quality of lakes, rivers, and streams in the province. MECP works with municipalities to ensure that a 30-metre setback from surface waters for all new structures is enshrined in their OP and implementing zoning by-laws to protect buffer zones and water quality. In working with municipalities, MECP seeks to ensure no property owner discharges anything that may impair water quality. Additionally, MECP responds to complaints/notifications of actual or potential contravention of provincial environmental legislation. Confirmed contraventions must be addressed by the responsible party(ies). The nature of the contravention and the risk to public health and the environment are considered when determining how quickly a contravention must be addressed.

Additionally, MECP has an interest in air quality in particular air emitting equipment. Property owners may be required to undertake an ECA for air quality in accordance with provincial guidelines that generally apply to industrial or commercial uses. An ECA for noise would generally regulate matters such as impulse noises or point source for a commercial use (e.g. equipment). An ECA for noise is unable to regulate behavioural sources such as loud voices, music, etc. as these are otherwise regulated by municipal noise by-laws.

In addition to the regulatory powers of MECP as they relate to tourist campgrounds, they are also a commenting agency and can review and provide comment on development applications under the Planning Act. An example of some of the matters that MECP comments on when reviewing a development application include:

- / Density and setbacks
- / Buffer protection (ribbon of life) not just the buffer setback
- / Lake impact assessment and lake impact concerns

The commenting power of MECP is intended to ensure their mandate of protecting water quality is met by engaging proactively with applicants.

1.3.3 Ministry of Northern Development, Mines, Natural Resources and Forestry (MNRF)

The role of the Ministry of Northern Development, Mines, Natural Resources and Forests is to protect the biodiversity of Ontario while promoting opportunities in the resource sector and supporting outdoor recreation activities. The MNRF's jurisdiction includes Northern Ontario, provincially significant wetlands, and Crown Land within provincial jurisdiction (e.g. land under federal jurisdiction such as the Rideau Canal falls outside of MNRF's regulatory control).

MNRF has regulatory power over activities such as docks that are affixed to the bed of a waterbody where the footprint on the waterbed is in excess of 15 square metres as this falls under their mandate of regulating the Public Lands Act. MNRF also has the ability to regulate shoreline alteration below the highwater mark outside of the jurisdiction of Parks Canada. MNRF has commenting power over the creation of Official Plans, and development reviews in a similar capacity to MECP, and is capable of providing peer review services in support of municipalities.

1.3.4 Cataraqui Region Conservation Authority (CRCA)

The role of the Cataraqui Region Conservation Authority (CRCA) is to work in partnership with local municipalities, provincial and federal government agencies, environmental organizations and the general public to monitor and protect water, natural habitats, shorelines, and promote sustainable living in their community while also avoiding natural hazards. Conservation Authority boundaries are based on watershed boundaries, not political boundaries, and so the CRCA regulates only the southern portion of the Township of Rideau Lakes. CRCA regulatory authority extends to 15 metres from any erosion hazard, 120 metres from any provincially significant wetland, 30 metres from any non-significant wetland, and 15 metres from a mapped 1:100 year flood plain.

The CRCA has the ability to issue permits within its regulated area and therefore can influence the placement and positioning of a trailer that is seasonal or that has permanent decks. Docks and structures that are affixed to the shoreline, above the high water mark, also fall within the CRCA's regulatory mandate.

The CRCA also acts as a commenting agency over development applications outside of their regulated area but within the overall geography of the Conservation Authority. Their comments in the case of expansions and creation of new campgrounds generally relate to the peer-review of environmental impact studies, natural hazards protection, natural heritage protection, and stormwater management.

1.3.5 Rideau Valley Conservation Authority (RVCA)

The RVCA's regulatory role and jurisdiction is broadly similar to that of the CRCA. The role of the Rideau Valley Conservation Authority is twofold, the first is to protect people and property from natural hazards such as flooding and erosion hazards. The second is to protect the watershed through environmental monitoring and reporting, on-the-ground restoration and stewardship, conservation lands and education, development review and approval and flood forecasting and warning, and working in close partnership with member municipalities and other levels of government. The jurisdiction of the RVCA is the northern portion of the Township of Rideau Lakes and their regulatory boundary is 15 metres from the 1:100-year floodplain, 30 metres from the high-water mark, and 120 metres from a provincially significant wetland.

The RVCA has regulatory power over the shoreline and floodplain, however, the floodplain must be mapped for their regulatory power to come into effect. Additionally, the RVCA has regulatory power of all land within 120 metres of a provincially significant wetland. This means that development within these areas is unable to move forward without approval from the RVCA.

Similar to the CRCA, the RVCA acts as a commenting agency over development application outside of their regulated area including the peer-review of environmental impact studies but within the overall geography of the Conservation Authority.

1.3.6 Chief Building Officer and Manager of Development Services Rideau Lakes

The role of the Chief Building Official (CBO) is to act as the designated person responsible for implementing the Ontario Building Code (OBC) and the Ontario Building Code Act within the Township. The OBC requires permits

for any building or structure with a footprint of 10 square metres (108 square feet) or more. This means that any deck that exceeds this threshold is required to obtain a building permit. The seasonal placement of park model trailers with a CSA designation of Z-241 requires a building permit as well, to ensure that the structures and any required anchoring and construction of a secure pad is in conformity with the OBC. The OBC requirement for such structures refers to the manufacturer's installation specifications, therefore the CBO's responsibility is to ensure adherence to the approved specifications, including for anchoring.

The responsibility for overseeing land use planning applications under the Planning Act falls to the Manager of Development Services. In this capacity, the manager plays an administrative role in ensuring that applications adhere to Planning Act requirements and processes, as well as a professional role in reviewing applications for consistency, conformity and compliance with policy and regulatory documents. The manager's role further extends to conducting inspections for adherence to site plan control obligations as well as zoning compliance, where time and resources allow.

1.4 The Planning Process

Land Use Planning in Ontario follows a process which is set out by legislation. Referred to as top-down planning, land use planning has a hierarchical approach starting with the Planning Act at the top and with lower-tier municipal by-laws at the bottom. This section works through and explains the key documents related to land use planning starting from the top working to the bottom, with every document needing to conform with the preceding. The documents this section will cover are the Planning Act, the Provincial Policy Statement (PPS), upper- and lower-tier Official Plans, the zoning by-law, and the site plan control by-law.

1.4.1 The Planning Act

The Planning Act ("the Act") is provincial legislation which provides the legal guidance and describes who and how land use planning is controlled in Ontario. This means the Act is the law and all land use planning in the province must conform with it. With regard to tourist campground development, it should be noted the Act requires development applications adhere to policy statements such as the Provincial Policy Statement.

The Act provides the basis for Official Plans, which are enabled through section 16. What is important to note is Official Plans can be amended. Typically, Official Plan amendments occur when a property owner wants to use or develop their property in a way that does not conform or conflicts with the Official Plan. The Act allows such amendments under Section 16 and provides the process for such an amendment. Applicant driven amendments could allow a landowner to change the land use designation of their property to a designation which allows a tourist campground as a permitted use.

The Act also provides the basis for zoning by-laws, which are enabled through Section 34. Similar to official plans, zoning by-laws can also be amended to change the zoning of a property or create a site specific zone. Zoning by-law amendments are enabled by the Act under Section 34 and are typically utilized when an owner or applicant seeks to use or develop a property in a way that is not permitted under the current zoning by-law. Through the rezoning process, an applicant can change the zoning on a property with respect to permitted uses and/or performance standards by changing the zoning or through the creation of a site-specific zone. Under Section 45 of the Act, which deals with the powers of the Committee of Adjustment, an applicant can also seek adjustments in relation to interpretation of permitted uses, expansion of legal non-conforming rights, or by varying performance standards. The Act sets out specific tests for each application type under Section 45 that must be addressed by applicants to the satisfaction of the Committee of Adjustment.

1.4.2 Provincial Policy Statement, 2020 (PPS)

This section identifies the purpose of the PPS and how it influences land use planning in the province of Ontario. The PPS provides policy direction which recognizes the province's long-term prosperity, socio and environmental health are dependent on efficient land use patterns which are sustained by the promotion of strong, liveable, healthy and resilient communities, that protect public health and the environment while facilitating economic growth. The PPS deals with the protection natural heritage (such as wetlands and woodlands), water, agricultural, mineral, cultural heritage (such as structures and landscapes) and archaeological resources. The PPS also deals with protection of Ontario communities by directing development away from areas of natural or human-made hazards where there is an unacceptable risk to public health or

safety, or property damage. Any decision made by the Council of a municipality, planning board, and/or the Ontario Land Tribunal as it relates to development such as tourist campgrounds must be consistent with the PPS.

1.4.3 Official Plans

An Official Plan (OP) is a public document required by the Planning Act that describes the upper, lower or single-tier municipal council's policies on how land in the community is to be used as well as establishing overarching goals and objectives for the municipality with respect to a wide variety of policy areas related to land use planning. Official Plans are prepared utilizing community input to ensure they meet the needs of the community. OPs are reviewed and approved by the province or by an upper-tier municipality to ensure that they are consistent with the PPS and that they conform to upper tier OPs or provincial plans such as the Growth Plan for the Greater Golden Horseshoe. In the Township of Rideau Lakes, the upper-tier municipality is the United Counties of Leeds and Grenville (UCLG), and the lower tier is the municipality of the Township of Rideau Lakes. In the case of upper and lower tier municipalities, the Official Plan of the upper tier typically deals with broader planning issues that affect more than one municipality, while the lower tier official plan and accompanying zoning by-law must conform to the upper tier plan.

While being a key policy document for municipalities, Official Plans can be changed or amended as previously noted as the community's needs change. There are two processes to amend an Official Plan, the first being an applicant-driven amendment, and the second being a municipally-led five-year review as mandated by the Planning Act.

1.4.3.1 United Counties of Leeds and Grenville Official Plan

The United Counties of Leeds and Grenville Official Plan deals with planning issues for ten municipalities, including the Township of Rideau Lakes. The intent of this Official Plan is to provide over-arching policy direction for matters of county-wide significance, to direct growth management and land use decisions, and provide upper-tier land use planning guidance.

With regard to tourist campgrounds, these are broadly noted as a permitted use under the rural land use designation as a tourist commercial area. The UCLG Official Plan also provides broad guidance for the protection of natural heritage and avoidance of natural and human-made hazards. Specific guidance with respect to tourist commercial uses is generally left to lower tier municipalities to define in accordance with the needs of their respective community.

1.4.3.2 Township of Rideau Lakes Official Plan

The Township of Rideau Lakes is the lower-tier municipality and therefore its Official Plan must conform with the UCLG Official Plan. The Township has recently completed a five-year review of its Official Plan, which has been adopted by Council and which is currently under review by the UCLG. As this updated Official Plan is expected to go into full force and effect early in 2022, this report reviews the adopted OP only and does not provide further consideration of the current or previous OP.

With regard to tourist campgrounds, the OP has dedicated policies associated with Tourist Commercial uses, in particular tourist campgrounds:

Tourist Lodging Establishments and Tourist campgrounds are significant tourist commercial developments within the Rural designation due to their potential environmental and community impacts. Tourist Lodging Establishments are uses that offer temporary accommodation within buildings such as hotels, lodges, seasonal camps, or a series of cabins. Tourist campgrounds are uses that offer seasonal and temporary accommodations through the use of tents, recreational vehicles and/or trailers. This Plan recognizes that Tourist campground and Tourist Lodging Establishment density is an important component to managing environmental and land use compatibility concerns; the implementing Zoning By-law will identify specific density provisions to these uses in order to mitigate these concerns.

This policy of the Official Plan defines a tourist campground and recognizes the potential impact on the environment and community that this use represents. Additionally, this policy recognizes that density is to be addressed through zoning to manage potential land use compatibility and environmental concerns. Since the

zoning by-law must conform to the Official Plan, this means the future zoning of tourist campgrounds will need to introduce density controls which comply with the prescribed density metrics. Density controls can be implemented in different ways, as discussed later in this report.

The Official Plan also speaks to Waterfront Development Policies including Lake Impacts and Non-Conforming Development under section 2.2. In this section, the Official Plan notes the need for Lake Impact Assessments and Capacity Studies to support waterfront development, general development policies related to water setbacks and frontage, and it also speaks to the requirements that non-conforming uses must meet when being redeveloped along the waterfront including the replacement or renovation of insufficient septic systems. Environmental protection is broadly spoken to throughout the plan but is addressed more specifically through Natural Heritage Features and Systems under section 2.20. This section of the Official Plan outlines fish habitats, wetlands, woodlands, wildlife habitats, and endangered species and species at risk in relation to where development may occur near these resources, in addition to speaking to environmental impact statements and their requirements. The Official Plans also lists all of the potential studies that could be required for an application to be deemed complete which include a Lake Impact Study and Capacity Assessment, Environmental Impact Statement, Boat Capacity Study, and Hydrogeological Assessment under section 5.11.

1.4.4 Zoning By-law No. 2005-6

The current zoning by-law for the Township of Rideau Lakes is Zoning By-law No. 2005-6, this by-law is comprehensive and divides the municipality into different land use zones. As previously mentioned, a zoning by-law controls the use of land and prescribes:

- how land can be used;
- where building and other structures may be located;
- the type of building that are permitted and how they may be used; and
- the lot sizes and dimensions, parking requirements, building heights and densities (the number of people, jobs and building floor area per hectare), and setbacks from the street.

While an Official Plan provides the general policies for future land use in a municipality, the zoning by-law puts the plan into effect and provides specific requirements that are legally enforceable. Therefore, new development or construction that does not comply with the zoning by-law is not allowed and will be refused a building permit. When a zoning by-law is changed or when one is first created, any use or building that legally existed previously becomes a legal non-conforming use and is permitted to remain. When a property becomes legal non-conforming it may still operate and act as it did before it became non-conforming, however, if the owner of the use or land wishes to expand a use, it will be subject to the new zoning and will have to conform prior to receiving a building permit as previously noted. The Act provides a separate mechanism to allow expansions of legal non-conforming uses or buildings without requiring a zoning by-law amendment as well.

Regarding tourist campgrounds, the zone in the Township of Rideau Lakes Zoning By-law No. 2005-6 which permits the tourist campground use is the Tourist Commercial (CT) zone. Tourist campgrounds are defined as follows in the by-law:

[...] any parcel of land which is used to provide temporary accommodation for the public or members of an organization in tents, trailers, tourist trailers or recreational vehicles.

The requirements for tourist campgrounds in the current zoning by-law are presented in the table below:

| Zoning By-law Provision | Requirement |
|---|-------------|
| Tourist Campground (Section 6.3) | |
| Lot Area (minimum) – Tourist Campground | 2 hectares |
| Lot Frontage (minimum) | 60 metres |
| Front Yard (minimum) | 10 metres |
| Exterior Side Yard (minimum) | 10 metres |
| Interior Yard (minimum) | 10 metres |

| Zoning By-law Provision | | Requirement |
|--|--|--|
| Tourist Campground (Section 6.3) | | |
| Rear Yard (minimum) | | 15 metres |
| Accessory Dwelling Unit Area (minimum) | | 60 m ² |
| Tourist Campground Site | | |
| Site Area (minimum) | | 60 m ² |
| Open Deck (maximum) | | 30 m ² |
| Accessory Structures (maximum) | | 1 |
| Accessory Structure Size (maximum) | | 10 m ² |
| Lot Coverage (maximum) | | 30 % |
| Accessory Dwelling or Dwelling Units per lot (maximum) | | 1 |
| General Provisions (Section 3) | | |
| Parking Requirement – Mobile Home Park or Campground | | 1 space per site |
| Shoreline Area Occupancy | | Maximum of 20% or 15 metres (whichever is lesser) of the shoreline area shall be occupied by marine facilities, pump houses, stairs, decks, patios, gazebos and all other accessory buildings and structures. The shoreline shall include the portion of the lot within 3 metres of the high water mark. |
| Water Frontage and Water Setbacks | | Minimum Water Frontage shall be 60 metres |
| | | Minimum Water Setback shall be 30 metres for all buildings and structures, including all sewage disposal systems excluding the following: <ul style="list-style-type: none"> - Decks, gazebos and other similar structures such as hot tubs, unattached to a main building and have a combined horizontal surface area of less than 14 m² - Marinas, pump houses, marine facilities and stairs |
| Yard and Water Setback Encroachments | | The following encroachments are permitted: <ul style="list-style-type: none"> - Sills, belt courses, chimneys, cornices, eaves, gutters, parapets, bay windows and other ornamental features may project into any yard or water setback by not more than 0.6m - Attached decks and balconies may project from the main building into any minimum required yard setback by not more than 3m - Attached decks and balconies may project from the main building into any water setback by a maximum of: <ul style="list-style-type: none"> a. 1.2m where the main building is located less than 8m from the high water mark. This deck shall be limited to 2m² of horizontal surface area; b. 2m where the main building is equal to or greater than 8m but less than 15m from the high water mark. This deck shall not be limited in horizontal surface area; or c. 4m where the main building is equal to or greater than 15m. This deck shall not be limited in horizontal surface area |

| Zoning By-law Provision | Requirement |
|--|--|
| Tourist Campground (Section 6.3) | |
| | <ul style="list-style-type: none"> - Awnings, clothes poles, flag poles, garden trellises, fences, plant materials, play structures under 10m², temporary event tents, stairs, ramps for accessibility, landings (as minimal as required by the Ontario Building Code) and similar accessory structures shall be permitted in any required yard or water setback - Swimming pools may be located in a required interior side or rear yard, provided that the minimum yard shall be 3m. Swimming pools shall not encroach into the required water setback such that the water setback of the pool would be less than that of any existing noncomplying dwelling or non-residential main building. For the purposes of this section, hot tubs shall not be considered to be swimming pools. - For added clarity, an accessibility deck shall only encroach into the water setback when a main building has a water setback equal to or greater than 8m. An accessibility deck shall maintain the minimum required yard applicable to all other decks |
| Additional Lot Coverage and Floor Space Index Provisions for a Lot abutting a Water Body | The maximum lot coverage and floor space index requirements of this By-law shall also be complied with on the basis of including only that portion of the lot area situated within 60m of the high water mark for the purpose of the calculations. |

Within the zoning by-law, there are ten site-specific Tourist Commercial zones. Site specific zones are generally the result of an applicant-driven zoning by-law amendment, or they can be captured by a municipality at the time of a comprehensive zoning by-law update. Of the ten site specific zones, there are three identified site-specific zones for tourist campgrounds which are noted below:

CT-3 (Parts of Lots 20 & 21, Concession 2, North Crosby)

- Permitted uses shall be restricted to a tourist campground;
- A maximum of 30 tourist campground sites shall be permitted.

CT-5 (Part of Lot 25, Concession 1, Bastard & South Burgess)

- Permitted uses shall be restricted to a tourist campground;
- A maximum of 94 tourist campground sites shall be permitted.

CT-7 (Part of Lot 26 and 27, Concession 2, Bastard & South Burgess)

Notwithstanding the provisions of Section 6.3 to the contrary, on the lands zoned CT-7 the following additional provisions apply:

- The number of trailers or recreational vehicles permitted within the CT zoned shall not exceed 91;

- *The number of accommodation units permitted within the Tourist Lodging Establishment shall not exceed 8;*
- *An existing trailer or recreational vehicle that encroaches within a required yard or setback is permitted in its current location, but shall not be expanded, enlarged, or replaced except on an approved site in compliance with CT-7 zone standards;*
- *The interior side yard requirement shall be in accordance with the CT zone standard except the standard shall be 5 metres for that portion of the subject lands described as Part 18 on Plan 28R-5037 adjacent to the eastern side of the adjacent waterfront residential property, and 25m from the property line running between Parts 12 (on the subject lands) and Part 11 (on the adjacent waterfront residential property) on Plan 28R-5037;*
- *No constructed additions shall be permitted to the trailers except for those specifically manufactured as an attachment to a trailer. These permitted attachments shall comply to all standards of the CT-7 zone. A deck shall not be considered an addition; and*
- *Each trailer site shall be permitted one accessory building not to exceed 9.3m² (100ft²). (#2009-3 – January, 2009)*

In addition to the zoning requirements, below are some definitions which are important to note as they are relevant to interpretation of zoning in relation to tourist campgrounds. We include the definition of a Mobile Home, which is not permitted in a tourist campground, as it makes reference to terms (e.g. travel trailer, tent trailer, trailer) that are not otherwise defined in the by-law:

High Water Mark: *shall mean the mark made on the shore or bank of a water body through the action of water, which action has continued over such a long period of time that it has created a difference between the character of the vegetation or soil below the mark and that above the mark, except that in the case of the Rideau Canal the high water mark shall be the upper controlled water elevation. For the purposes of this definition, Rideau Canal shall include the following lakes and their connecting channels: Lower Rideau, Big Rideau, Upper Rideau, Newboro, Loon, Mosquito, Benson, Indian, Clear, Opinicon, Sand and Whitefish Lakes.*

Mobile Home: *shall mean a prefabricated building which bears a CSA Z240 approval and which is designed to be towed on its own chassis (notwithstanding that its running gear is or may be removed), designed and equipped for year round occupancy and containing therein facilities for cooking or for the installation of cooking equipment, as well as sanitary facilities including a flush toilet and shower or bathtub. This definition shall not include a travel trailer or tent trailer or trailer otherwise defined in this By-law.*

Shoreline: *shall mean any lot line or portion thereof which is the shore of a water body.*

Water Frontage: *shall mean, in the case of a lot which abuts a water body, the width of such lot measured between the intersections of the side lot lines with a line that is continuously 6 m back from and parallel to the high water mark.*

Water Setback: *shall mean, in reference to a water body, the horizontal distance between the high water mark and the nearest building line.*

1.4.5 Site Plan Control By-law

Site Plan Control is a process under the Act that precedes the issuance of a building permit under the OBC. The reason Site Plan Control is utilized is to ensure that:

- Developments are built and maintained the way they were approved by council
- New developments meet certain standards such as quality and appearance
- Access for pedestrians and vehicles is safe and easy
- There is adequate landscaping and drainage

- Nearby properties are protected from incompatible development

With regard to tourist campgrounds, the Planning Act states the following regarding trailers relative to the Site Plan Control area:

“development” means the construction, erection or placing of one or more buildings or structures on land or the making of an addition or alteration to a building or structure that has the effect of substantially increasing the size or usability thereof, or the laying out and establishment of a commercial parking lot or of sites for the location of three or more trailers as defined in subsection 164 (4) of the Municipal Act, 2001 or subsection 3 (1) of the City of Toronto Act, 2006, as the case may be, or of sites for the location of three or more mobile homes as defined in subsection 46 (1) of this Act or of sites for the construction, erection or location of three or more land lease community homes as defined in subsection 46 (1) of this Act. R.S.O. 1990, c. P.13, s. 41 (1); 1994, c. 4, s. 14; 2002, c. 17, Sched. B, s. 14 (1); 2006, c. 32, Sched. C, s. 47 (8).

This means that if a tourist campground that is currently bound by a Site Plan Control Agreement, an amendment to the agreement is not required if two or fewer trailers are added or relocated annually, so long as these otherwise comply with the zoning by-law. As this requirement is set forth in the Act, a municipal site plan control by-law is not able to supersede the provincial legislation and a municipality is not able to force a campground to amend its site plan control agreement if two or fewer trailers are added or relocated annually.

2.0

Issues + Options

During Phase 1 of the land use study, hundreds of comments regarding tourist campgrounds were received from the stakeholder sessions, surveys, email correspondence, and meetings with regulatory agencies. These comments have been documented and reviewed by the project team. Given the large number of comments and the variable nature in which those comments have been received, the project team has elected to present the comments in a summary format in the table below. Through the review of all the comments and concerns gathered during the consultation process, the project team identified prevalent themes, indicated in the left-hand column in the Issues Table. There were 29 themes identified, although there are a significant number of themes that overlap or that relate directly to one another. Relevant and paraphrased comments received in relation to the themes are provided in the centre column titled “Comments”. Although the same comment may have been received several dozen times, only a single instance of each specific comment is provided in the table.

During the public consultation period, the project team received a number of comments and concerns regarding their role in the project. The planning profession in Canada is subject to professional obligations that all members of the profession must adhere to, such as the Ontario Professional Planners Institute’s (OPPI’s) Professional Code of Practice & Standards and the Canadian Institute of Planners’ (CIP’s) Codes of Professional Conduct. Both Codes require that planners place the Public Interest above all other professional obligations. As planners, our primary responsibility is therefore to define and serve the interests of the public. The public interest is often not clearly defined, particularly when there are conflicting public opinions on an issue or subject. As such, planners attempt to identify and address underlying concerns and balance them against one another and against interests that are not easily found through outreach, to arrive at an independent professional planning opinion that represents a “best fit” in balancing multiple interests and upholding the public interest.

In the case of this study, the project team has experienced a plurality of opinions and perspectives as well as suggestions for addressing or resolving the issues being experienced. Some suggestions and opinions directly conflict, as can be expected in any circumstance such as this where a significant degree of public concern has been raised. This is relatively common in land use planning matters. Township Council will ultimately have the responsibility to make a decision on the recommendations arising out of this land use study. At this stage in the process, our aim is to communicate the issues and perspectives that we have received in a manner that is comprehensible while not compromising the underlying concerns. We invite stakeholders to provide feedback to the project team on the issues and options contained herein to ensure that we have accurately captured their perspectives and to ensure that we include as full a suite of options for Council’s consideration as possible given the scope and timing of this project.

2.1 Issues + Options Table

The table below identifies the overall Issues, specific concerns related to each issue, and options or responses as presented by the project team. The issues represent what the project team heard from the community and there is significant overlap between the issues. The table intends to capture the nuances in the issues received. For example, a number of comments related to specific issues reference the impact of tourist campgrounds on shorelines and water quality and a separate density issue is listed in the table as well, representing the concern with tourist campground density in and of itself. The purpose of the options/response column is to respond to comments which are unable to be addressed by one of the proposed options or to briefly capture which option will address the comment. The options represent approaches grounded in land use planning tools such as the Township’s Official Plan, zoning by-law, and other municipal by-laws that authorized under the Planning Act or the Municipal Act. Section 2.2 provides further detail on the options noted in the table below.

| Issue | Comment | Option/Response |
|-------------------------|--|--|
| 1. Water Quality | <p>Concerns for water quality impacts from septic, shoreline degradation, and stormwater management.</p> <p>Concerns over water pollution</p> <p>Concerns over nutrient loading</p> <p>Increased run off into lakes</p> <p>The presence of algae blooms are new and are a concern</p> <p>Increase in algae related run off</p> <p>Any threats to the lakes needs to be prevented</p> <p>Sewage is going into the lake</p> <p>Hardened surfaces due to tree loss has increased run off into lakes</p> | <p>Review and amend policy and/or regulatory framework regarding septic system setbacks, shoreline protection, and stormwater management. Potential options to address these comments include 2, 3, 5, 6, 7, 8 and 10.</p> |
| | <p>The creation of beaches have had an affect on the water</p> <p>The development of the shoreline has impacted the lakes and water quality</p> | <p>Consider new shoreline protection by-laws. Most efficiently addressed by option 7.</p> |
| | <p>Need for lake impact studies for development proposal over a certain size to ensure water quality</p> <p>Concern over the growth of weeds in the water</p> | <p>Review and amend policy framework and requirements for lake impact studies. Option 2.</p> |
| | <p>Need for Environmental Impact Study (EIS) for all waterfront development in addition to a Lake Impact Study</p> | <p>Amend OP to indicate most Environmental Impact Assessment's (EIA) are already being peer-reviewed by Conservation Authorities.</p> |
| | <p>Concern that overdevelopment or density will pollute the water or reduce water quality.</p> <p>Increased density will have a negative affect on water quality</p> | <p>Review and amend policy and/or regulatory framework regarding density of tourist campgrounds. Option 2 and 3.</p> |
| | <p>Collaboration with local government to tackle water quality</p> <p>Lack of resources for MECP had led to phosphorus from effluent running into the lake</p> | <p>Current policy framework supports collaboration between government and review agencies, including the MECP.</p> |

| Issue | Comment | Option/Response |
|---------------------|--|---|
| 2. Shoreline | <p>Collaboration with local government to tackle shoreline development</p> <p>Clear guidelines around shoreline modification</p> <p>Increase the shoreline buffering has an affect on the ribbon of life</p> <p>The need for a realization that shoreline development is not favourable for the township</p> <p>The creation of beaches have impacted shoreline vegetation</p> | <p>Current policy framework supports collaboration between government and review agencies.</p> <p>Review and amend policy and/or regulatory framework regarding shoreline protection. The OP has strong policies and would be best supplemented by options 5, 6, and 7.</p> |
| | <p>Concern over shoreline erosion</p> <p>Would like to see waterfront vegetation improved</p> <p>Shoreline should remain in its natural state</p> | <p>Consider a new shoreline protection by-law, option 5.</p> |
| | <p>No more secret shoreline modifications</p> | <p>Review potential for administrative or financial penalties by-laws, option 8.</p> |
| | <p>Use and access to waterfront</p> | <p>Review policies regarding provision of access to waterfront. Addressed in the OP and supplemented by options 2 and 5.</p> |
| | <p>Overuse and crowding of the waterfront</p> <p>Density affects the shoreline</p> | <p>Review and amend policy and/or regulatory framework regarding density of tourist campgrounds. Options 2 and 3.</p> |
| 3. Septic | <p>Collaboration with local government to tackle septic issues</p> | <p>Current policy framework supports collaboration between government and review agencies.</p> |
| | <p>There is a need for state-of-the-art septic systems in campgrounds typical of a village</p> | <p>MECP regulates large septic systems.</p> |
| | <p>Clear guidelines for septic systems</p> <p>Should be regulated on best practices and reviewed to ensure they are not over designed to under perform</p> | <p>MECP works with applicants to ensure that large septic systems achieve the required level of treatment.</p> |

| Issue | Comment | Option/Response |
|-----------------------|--|--|
| | Concern over campground weeping fields | |
| | Concerns over grey water | |
| | <p>Septic inspection only carried out by MECP and has been irregular with one failed septic not rectified for years – better management needed to ensure everything is up to standard</p> <p>Sewage leaks on Big Rideau Lake</p> | Existing systems are not “grandfathered”. MECP has the ability to review and require improvements. MECP works with property owners to achieve the required improvements within a timeframe that can be influenced by potential impacts from the existing septic system. |
| | <p>Concern over outdated and unregulated septic systems</p> <p>Regular inspections for septic</p> <p>Septic systems should have more strict guidelines</p> | Municipal site plan control agreements identify septic locations, and zoning can regulate setbacks. MECP environmental compliance approvals (ECA) provide a framework for ensuring that appropriate systems are used for new development. ECAs require regular monitoring and reporting. |
| | Not as strict as for campgrounds as cottages | The Township regulates septic systems for private dwellings and cottages, MECP regulates larger systems for most campgrounds. The design and ongoing monitoring and reporting requirements for large septic systems are significantly more robust than for private dwellings, however existing and older systems have to be brought up to current standards, which takes time. |
| | Septic flow rates using residential calculations don't make sense | MECP works with ECA applicants to implement appropriate standards. Use of actual data instead of code standards is possible with MECP approval. |
| 4. Lake Impact | <p>Concern over development on a small shallow lake</p> <p>Concern over lake impact from septic, shoreline degradation, and stormwater management</p> <p>Concern over fuel spills</p> <p>Litter in the lake</p> <p>There should be lake impact studies</p> <p>Concern over the growth of weeds in the water</p> <p>Need for lake impact studies for development proposals over a certain density</p> | Review and amend policy framework and requirements for lake impact studies. OP has strong policies but can be supplemented by options 2, 3, and 10. |

| Issue | Comment | Option/Response |
|-------------------|--|--|
| | Hardened surfaces due to tree loss has increased run off (nutrient loading, algae) and impacted the lakes | Review and amend policy framework as it relates to stormwater management and septic setback requirements. Addressed in options 2, 3, 5, 6, 7, 8. |
| | The development of the shoreline has impacted the lakes and water quality | Consider new shoreline protection by-laws. Option 5. |
| | Need setbacks from lakes to alleviate impacts | Review and amend policy framework as it relates to minimum required setbacks from waterbodies. Best addressed by option 3. |
| | Boat traffic tied to algae blooms Invasive species due to boat traffic | Review and amend policy framework as it relates to assessing impact from boat traffic on lakes. Option 2. |
| 5. Noise | Noise impact on small lake | Review and amend policy and regulatory framework as it relates to noise impacts. Option 9. |
| | Density means more noise | |
| | Local disruptions due to noise from campers and watercraft Overall noise issues Late night noise Noise intolerable over the weekends Noise from boats and residents is ridiculous all summer Noise issues have been affecting the wildlife The noise disrupts the community Noise from music shows and construction equipment | Review and amend the noise by-law if necessary. Option 9. |
| 6. Density | Concern over dense development on a small shallow lake There is a level of unchecked growth Increased density on a site threatens wildlife Excessive population issues, concerned campgrounds will be larger than a village Overuse of the water table due to high density | Review and amend policy and/or regulatory framework regarding density of tourist campgrounds. Option 2, 3, and 9. |

| Issue | Comment | Option/Response |
|----------------------|---|--|
| | Density has been left unchecked Additional density on a closed lake is not sustainable Density affects the environment Density affects tree coverage | |
| | Should examine, campsites per acre, trailers per acre or hectare, maximum size, campgrounds in an area, frontage relative to density An equation relative to waterfrontage to campsites should be created The need to be 200 feet for waterfrontage for a cottage, but campground do not have to follow this Density should be related to usable land Consistent application of how waterfront is to be used Need a density cap Density relative to water frontage need to be addressed | Various options for regulating density are proposed. Will need to consider options such as number of campsites as a function of property size, developable area on a property, shoreline, etc. Best addressed by option 3. |
| | Need to distribute campgrounds as opposed to the current concentration | Review and amend policy and/or regulatory framework regarding concentration of tourist campgrounds within a given area at a larger scale than individual properties. Option 3. |
| 7. Tree Cover | Clear guidelines around forest coverage through by-laws and Conservation Authority directives | Review policy framework as it relates to tree cover. Option 2. |
| | Concern over loss of forest coverage over shoreline degradation Concern over the cutting down of trees Conventional vegetation should be minimized to 'rewild' impacted areas Potential introduction of a tree cutting by-law to protect forest coverage | Consider creation of a tree cutting and/or shoreline protection by-law. Options 5 and 7. |
| 8. Habitat | Loss of habitat with increased land use Loss of habitat from shoreline degradation | Review policy framework and amend if necessary. Current OP supports protection of habitat, shorelines and species at risk. Option 2. |

| Issue | Comment | Option/Response |
|----------------------------|---|---|
| | Loss of fish habitat from excessive docks and boat slips Expansion would in areas with known species at risk | |
| 9. Boat Traffic | Local disruptions due to boat traffic Excessive boat traffic Increased boat traffic and wake Too much boat traffic on weekends during the summer Too high of a concentration of boats in Hudson Bay | Review policy framework regarding triggers or requirements for relevant studies. Option 2. |
| | Docks and boat lifts exceeding shoreline capacity – need for policies on density of docks/boat lifts, and boat slips Huge massive docks have led to increased boat traffic | Review policy framework regarding limits on the scale, sizing and concentration of docks, boat lifts, etc. Option 2 and 3. |
| | Unlawful boat traffic Boats not policed correctly | The OPP is the enforcement body responsible on the waterway and should be contacted if unlawful activity is identified. |
| 10. Clarity/process | Define required studies by type of application Concerns EIS's are not done properly What are the rules of engagement for an EIS Is an EIS allowed to only take place on a desktop Concerns EIS are not being done sufficiently (only desktop review) Independent citizens did a peer review of an EIS where specialist informed them an EIS can take between 1 – 5 years | Review the policy framework regarding required studies. The current OP identifies an extensive list of possible studies. Option 2. A majority of EIA's are already reviewed by Conservation Authorities as part of their commenting authority. |

| Issue | Comment | Option/Response |
|-------|---|--|
| | Campgrounds should be regulated the same way as homes and cottages, especially regarding land use and environmental issues | All land uses are regulated through the zoning by-law. Standards between land uses differ based on the nature of the land use. Option 3. |
| | Limits placed on campground expansion | Review and amend policy and regulatory framework regarding limitations on campground expansion. Option 2 and 3. |
| | <p>There are many hoops to jump as a property owner relative to the waterfront/shoreline, docks, and buildings that are on campgrounds which may have even more impact</p> <p>Opposed to unmanaged growth</p> <p>Urge the Township to take immediate actions from extensive campground expansions that consider the environment</p> <p>Concerns that an environmental impact study is the only stab at environmental impact mitigation</p> <p>There needs to be consistent rule regarding matters of environmental impact</p> <p>Need flexible policies that appreciate the challenges and opportunities of campgrounds</p> <p>The definition of Campgrounds need to be reviewed and redone to capture their current use for clarity</p> <p>PPS encourages recreation and tourism in rural areas</p> <p>Site plan not triggered for less than 3 trailers</p> <p>New comprehensive bylaw for campgrounds to dictate density, frontage, setbacks</p> <p>Regulations should be applied for setbacks from property lines and buffers from campgrounds</p> <p>Park model trailers should be subject to a master plan, change in zoning, and Township oversight</p> <p>Adaptive and flexible framework required</p> | |

| Issue | Comment | Option/Response |
|-------|---|--|
| | <p>OP does not have enough teeth to the policies to hold owners accountable</p> <p>Park model only zoning should be considered</p> <p>Don't want to eradicate campgrounds, just manage them better with regulations</p> <p>Having developments approved before the new OP is approved is short-sighted</p> <p>Expensive to modernize older equipment especially situated on rock – there should be flexibility in policies to reflect physical constraints</p> <p>Need for a transition period to give space to correct policies if needed</p> <p>Concern regulation will be so tight there will no longer be economic vitality for campgrounds</p> | |
| | Does the PPs regulate density? | The PPS provides a high level framework guiding municipalities. Official Plans and zoning by-laws, including amendments to these policy and regulatory tools, must be consistent with the PPS. The PPS does not, however, establish prescriptive measures such as density. |
| | Increased regulation of wells and septic systems for tourist campgrounds | Wells and septic systems are governed by regulations set by the province. |
| | <p>Requirements for all campgrounds should be the same</p> <p>Will this affect my zoning and land use designation</p> <p>Rectify the existing legal non-conforming before expansion</p> | <p>Zoning by-laws can be amended in accordance with a prescribed process to establish site-specific standards. The Planning Act also grants legal non-conforming status to any land use that legally existed prior to a change in zoning standard. Any amendments to the zoning by-law arising from this process will not take away legal non-conforming rights for existing campgrounds. Rather, any changes would impose new restrictions and requirements on new or expanded campgrounds in the future.</p> |

| Issue | Comment | Option/Response |
|---------------------|---|---|
| | There are cottagers that rent out their spaces, yet they are not paying commercial tax, insurance, water lot leases for docking. Also not under the microscope of CRCA, MNRF, RVCA and the township | Short-term rental of individual cottages and cabins is an emergent challenge in land use planning and one that many municipalities are exploring. It is, however, outside the scope of this land use study. |
| | MECP can take up to 5 years to review a faulty septic | MECP review timelines vary and the MECP has indicated the severity of a given non-compliance matter may influence their timeline. |
| | Are campgrounds subject to site plan? | Tourist campgrounds are subject to site plan control. |
| | Lake Associations want early review on development and should be regulated with noise by-laws, lighting plans, landscaping plans, and other by-laws | All planning applications become public once they are deemed complete by the municipality. Site plan control provides a framework for implementing measures such as noise mitigation, landscaping, lighting, etc. |
| | Potential introduction of a tree cutting by-law to protect forest coverage | Consider implementing a tree-cutting by-law. Option 7. |
| | Large development along a UNESCO heritage site | This land use study is not intended to address concerns about any specific development proposals. Such considerations will be reviewed through any development application process. |
| | Plurality of citizens should be weighed against a singular campground Everyone in TRL are equal stakeholders | Assessing the public interest is an imperfect practice that balances many, often competing, considerations. Council will ultimately have the responsibility of making a decision in the public interest. |
| 11. Lighting | Increased light has an affect on the environment The lighting is disruptive to the community Campgrounds have a free pass on lighting Bound to be light pollution form such a large population | Review policy and regulatory framework regarding requirements for lighting plans and municipal standards. Option 2 and 4. |
| 12. Wetlands | Need to ensure wetlands are not being developed with regard to tourist campgrounds Concern that wetlands may begin to be developed | The current OP protects wetlands in accordance with provincial policy. There is a spectrum of protection: provincially significant wetlands (PSW) are more protected than locally significant wetlands. Unclassified wetlands |

| Issue | Comment | Option/Response |
|------------------------|--|--|
| | <p>Concern that swamplands will be invaded by development</p> <p>There is need to protect wetlands</p> <p>Further expansion into wetlands should not be allowed</p> <p>Concerns about the classification of wetlands</p> | <p>receive reduced protection unless they are classified as locally or provincially significant as part of a development application.</p> |
| 13. Environment | <p>There is a need to understand the impacts of campgrounds and boats on the environment</p> <p>Environmental issue arise due to unchecked growth</p> <p>Impact on the environment</p> <p>Environment showing stress from boating traffic</p> <p>Concern negative impacts will not be able to be undone</p> <p>Concerns density will negatively impact the environment</p> <p>Ensure mitigation to prevent environmental impact</p> <p>Blue green algae is a concern</p> <p>There needs to be more co-existence and sharing of resources (water, boat launches) for the environment to thrive – all needs to be used in a sustainable way</p> <p>There needs to be consistent rules over matters of environmental impact</p> <p>Parks Canada is questioning the level of usage along the lake</p> <p>There is a need to protect the environment</p> <p>Don't base decisions on expanded tax revenue from larger campgrounds as it will impact the environment</p> <p>Density affects the environment</p> <p>Newer park model trailers have longer life cycles which is better for then environment</p> | <p>Review and amend policy and/or regulatory framework regarding environmental impacts, broadly, and requirements/triggers for EIA.</p> <p>A majority of EIA's are peer-reviewed by Conservation Authorities as part of their commenting power.</p> <p>Consider implementing a formal pre-application by-law or process that allows review agencies to work with applicants to clarify terms of reference for an EIA early in the process. Option 2 and 3.</p> |

| Issue | Comment | Option/Response |
|-------------------------------|--|--|
| | <p>Campgrounds happy to undertake an EIS</p> <p>MNRF did a sampling study with the results not out</p> | |
| 14. Rural Character | The encroachment of campgrounds makes you feel like you are living in the city | Review policy and regulatory framework regarding policies and standards related to protecting privacy and typical standards of privacy and separation in the rural area. Option 2 and 3. |
| | <p>There are privacy issues with development</p> <p>Concern expansion will be in close proximity to lakeside properties</p> <p>Unbridled development will take away the character of the area</p> <p>So much development creates a loss of the rural setting</p> | |
| | Concerts and special events negatively pervade their neighbours | |
| 15. Municipal Services | <p>Who pays for extra garbage</p> <p>Campgrounds do not receive all services</p> <p>Campgrounds do receive all services</p> <p>Campground pay for their own garbage and plowing if any municipal services and still pay taxes</p> | Campgrounds do not receive municipal services in the form of solid waste disposal. Snow plowing is provided by the Township along municipal roads only. |
| | One campsite at the end of a cottage road, with insufficient services if there were a fire with everyone using this road | The site plan control process includes review by emergency services personnel to ensure adequate provision of services. |
| | Rural hydro and phone issue occur frequently now | The current policy framework supports collaboration between the Township and other agencies and service providers. |
| 16. Traffic | <p>Increased traffic on Big Rideau Lake Road</p> <p>Concerns over increased traffic volume</p> <p>Big Rideau Road not safe during the summertime</p> <p>McCann road should be utilized to alleviate traffic on big Road Lake Road</p> | Review policy framework regarding triggers for traffic studies for new development. Option 2. |

| Issue | Comment | Option/Response |
|----------------------|--|---|
| | <p>Need better control of speeding</p> <p>No issue with completing traffic studies if required</p> | |
| 17. Wildlife | <p>Species such as the native loon and trumpeter swan are at risk if their nesting areas are developed</p> <p>Disruption of bird and animal breeding grounds</p> <p>Need for wildlife conservation</p> <p>Recognition of wildlife corridors and habitat including waterfowl</p> <p>Fish are becoming scarce with some birds suffering</p> <p>Issues with overfishing</p> <p>Disruption to native swans</p> <p>More shoreline fishing</p> <p>Expansion would be in areas with known species at risk</p> | <p>The OP requires that new developments, including expansions to existing campgrounds, in proximity to natural heritage features are required to undertake environmental impact studies to assess potential impact on wildlife and habitat. Option 2. Additionally, Conservation Authorities already peer-reviewed as part of their commenting power.</p> |
| 18. Behaviour | <p>Trespassing concerns</p> <p>Karaoke and fireworks leading to noise</p> <p>Litter in the lake and on land</p> <p>Heavy pollution on the back roads</p> <p>Littering from vehicular and boat traffic</p> <p>Enforcement of property lines by campground operators</p> <p>Increased trespassing by campers</p> <p>Fine campgrounds for police calls</p> <p>Encroachment and trespassing</p> <p>Lack of respect to private property abutting campgrounds</p> <p>People using other driveways to turn around</p> <p>Campers trespass leaving landowners liable</p> <p>Crime is on the rise</p> | <p>Land use planning tools assume that activities occur in accordance with permitted land uses and behaviours that comply with other legislation such as the Trespass Act, the Criminal Code, the Highway Traffic Act, etc.</p> <p>There may be design options that can mitigate undesirable behaviour that can be implemented through site plan control, such as traffic calming measures, however these are limited by the nature of those behaviours and by the willingness of the population to adhere to appropriate standards of behaviour.</p> |

| Issue | Comment | Option/Response |
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| | <p>There is now the need to call the police on trespassers</p> <p>Individual not cleaning up after their dogs on yards</p> <p>People using private docks to fish</p> <p>Stolen property</p> <p>Campgrounds have policing to deal with issues (rules + bylaws)</p> | |
| | Where are the nuisance complaints coming from – we all share the same waterway | |
| 19. Drinking Water | <p>Strain and contamination of the aquifer</p> <p>Well issues at the beginning and end of season when campground is opening</p> <p>Overuse of the water table due to high density</p> | Review policy framework regarding requirements and triggers for hydrogeological assessments. Option 2. |
| | Well water is a paramount concern and HydroGeo's need to be double checked | Consider adopting a peer review standard and a roster of peer reviewers for certain technical studies. Option 2. |
| 20. Fire Risk | Nuisance fire hazards | Development applications are reviewed by municipal staff for fire safety and fire department reviews for compliance with the Fire Code. Review the Open Air Burning by-law. Option 8. |
| 21. Air Quality | <p>Restriction on campfires to alleviate their negative impact on air quality</p> <p>Excess smoke pollution</p> | Consider a review of the Open Air Burning by-law as it relates to campgrounds. Option 8. |
| 22. Electrical | <p>Electrical systems need to be maintained and frequently inspected to reduce fire risk</p> <p>Enforcement of regulations for electrical services</p> | The Electrical Safety Authority (ESA) is the regulating body that regulates electrical wiring and related standards, where Hydro One is generally responsible for providing power throughout the Township. Through the development process, applicants are required to work with electricity providers as part of the servicing design to ensure compliance with the Ontario Electrical Safety Code. As part of the building permit review process, the Township may also seek assistance from the ESA or electricity providers such as Hydro One where appropriate. |

| Issue | Comment | Option/Response |
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| 23. Taxation | <p>Campgrounds should be taxed appropriately</p> <p>Campgrounds do not receive all of the services cottagers do, (i.e. garbage and plowing) despite paying taxes</p> <p>Not all of the tax claims are accurate based on the services received</p> <p>Don't base decisions on expanded tax revenue from larger campgrounds as it will impact the environment</p> <p>There needs to be an MPAC review insisted upon by the township</p> | <p>The project team received numerous comments surrounding taxation and electoral representation. In the Township of Rideau Lakes, tax ratios are set by UCLG which is required to adhere to regulations imposed by the province of Ontario. The Municipal Property Assessment Corporation (MPAC) is responsible for assessing the value of properties for tax purposes. The project team received comments specifically dealing with the processes of valuing tourist campgrounds, of taxing them, and of controlling the ability of campground residents to be elected to municipal office. Land use planning tools are not suitable for addressing these issues, which are all dealt with through different aspects of provincial legislation. It is not possible for a municipality, for example, to establish Official Plan policies that deal with taxation or political representation in any form. TRL Council and stakeholders are encouraged to open a dialogue with the province to further explore these inter-related issues.</p> |
| | <p>Trailers are essentially cottages and should be taxed the same</p> <p>If trailer owners and cottagers both only use their cottages half of the year they should be taxed the same</p> <p>Fair and equitable taxation – not fair for a campsite with over 100 trailers to pay a similar tax rate</p> <p>Cottagers pick up the tax burden on campgrounds</p> <p>Increase campground taxes</p> <p>Campgrounds receive the same municipal services as everyone else</p> <p>If campground members pay tax they should have voting rights</p> | |
| 24. Land Use Study | <p>An adoption of an evidence-based approach using best practices</p> <p>Concern options will be presented without understanding the full picture</p> | <p>Recommendations will incorporate best practices.</p> |
| | <p>Campgrounds are a small portion of the commercial businesses, there are golf courses, resorts, and cottage renters; why are we targeted?</p> | <p>This land use study is examining land use issues dealing with tourist campgrounds at Council's direction.</p> |
| | <p>Fair and open consultation to determine a fair outcome for all</p> <p>Trust the land use study will be comprehensive and fair to all parties</p> | <p>The intent of this study is to maintain a broad and transparent public consultation process.</p> |

| Issue | Comment | Option/Response |
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| | <p>Need for transparency- not guided by politics</p> <p>Do not rush the process, take all of the time needed to ensure that the process finds out the issues</p> <p>Need for transparency - not guided by politics</p> | |
| | There should be an examination into how the campsites are being used | The zoning by-law regulates how campsites can be used. |
| | Encouragement of a land use study that incorporates all utilities and inspection needed on a more frequent basis | Consultation with regulatory agencies that conduct inspections (e.g. MECP, Township planning and building department, Parks Canada, Conservation Authorities) has taken place and is ongoing. |
| | <p>Council needs to have all of the information</p> <p>Lack of trust with council as they make promises in meetings and do not follow up in public meetings</p> | The purpose of this and subsequent reports is, in part, to inform Council and stakeholders. |
| 25. Economic Impact | <p>Campgrounds support the local economy and are vital to the success of the Township</p> <p>Park model trailer bring in a clientele which will positively impact the Township</p> <p>Campgrounds are strategic TRL partners in the sense they bring local merchants business and are key to their survival</p> <p>Residents with trailers bring their own goods and don't impact the community the same way as itinerant users</p> <p>The economic impact will be lessened if campgrounds get all of their necessities on site</p> <p>Campground users go to restaurants and local businesses</p> <p>There should be a TRIEM to demonstrate campgrounds economic impact</p> | While the economic impact of existing tourist campgrounds is of interest to the public, evaluating or assessing their economic impact is outside of the scope of this land use study. It is the project team's recommendation that campground operators work with the Regional Tourism Organization or another appropriate marketing body to collect economic information and share that data with Council and the public to continue the conversation regarding the economic benefits of tourist campgrounds in TRL. |

| Issue | Comment | Option/Response |
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| | <p>On campground polled their users and found families spend between \$3500-\$7500 per season in the community</p> <p>Some members of the community recognize that these campgrounds have a positive economic impact on the community</p> <p>Campgrounds impact through the creation of jobs, local service use, community involvement, and support the community and are an economic way to bring people to the community</p> <p>Needs to be an examination of a total economic cost benefit factor</p> | |
| 26. Non-compliance | <p>Enforcement of seasonal dates</p> <p>Need resources to police compliance with the by-law and other approvals</p> | <p>Review and consider licensing and administrative penalties by-laws. Options 8 and 10.</p> |
| | <p>Things seem to be done with asking for forgiveness coming after the fact</p> <p>Campgrounds have not been upfront with their plans and have done construction without township approval</p> <p>Not enough resources to ensure orderly development</p> <p>Inspect everyone – no discrimination</p> <p>Township is reactive rather than proactive to issues</p> | |
| | <p>Is it okay for campgrounds to circumvent the by-law for additional density?</p> | <p>The Planning Act allows property owners to apply to amend or vary zoning by-laws in accordance with a prescribed process.</p> |
| | <p>Decks are becoming more plentiful without regulation it seems</p> | <p>Decks below a certain size do not require building permits, though the Township is aware of decks having been constructed without permits where permits were required. Campground owners are required to obtain permits and clarify requirements with the Township when uncertain. Option 3 and 4.</p> |
| | <p>Parks Canada does not do a sufficient job regulating the waterways</p> | <p>Parks Canada regularly reviews waterways for compliance and follows up with reports of non-compliance.</p> |

| Issue | Comment | Option/Response |
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| 27. Residential Drift/Trailer Types | <p>Park Model trailer only zoning</p> <p>Z241 should be accepted as the standard in TRL for CT's – 540 ft²</p> <p>Trend to move towards park model trailers as they are what the market is looking for</p> <p>The newer park models have to be brought in on tractor trailer and are more permanent</p> <p>No longer "tourist" campgrounds</p> <p>These park model trailers are there year round and act the same as a cottage – they are built to be mobile but are not used this way</p> <p>Campgrounds becoming more of a trailer park than a campground</p> | <p>Review and amend the OP and zoning by-law as they relate to permitted trailer types, length of occupation, etc. Option 2 and 3.</p> |
| | <p>Clear definition of mobile homes vs permanent structures</p> <p>Campground upgrading camper sites to permanent mobile homes with 10 ft of farmland</p> <p>The Z241 is more homey and is being requested not forced</p> <p>Need clear definitions, the z241 is in essence a cottage</p> <p>Tourist campgrounds are no longer what they were 30 years ago – the new structures are cottages</p> <p>Just because its on wheels does not make it a camper</p> <p>Campgrounds need to remain seasonal and not year round</p> <p>Becoming permanent vs what was transient</p> <p>People are living in these dwelling year round and they are no longer seasonal – something must be defined</p> <p>Resort style community is not consistent with the intent of the zoning</p> | |

| Issue | Comment | Option/Response |
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| | People are staying their trailer year round now | |
| 28. Telecommunications | Installation and distribution of satellite and internet services are putting excessive loads on broadband infrastructure over the weekends and four summer months | Ensuring that telecommunication infrastructure is provided to new developments is a land use planning matter in the general sense of ensuring that telecommunication services are made available to new development. The project team received comments regarding overburdening of existing telecommunication infrastructure resulting in reduced service levels. While this is not a matter that can be addressed through land use planning tools, the province is currently working to address the issue of telecommunication services in Eastern Ontario through the Eastern Ontario Regional Network (EORN) and the Improving Connectivity for Ontario (ICON) program. |
| 29. Property Values | Cottages around campgrounds are still selling for 3x purchase price – is there really land devaluation There is a perception that campgrounds may deteriorate property values | Property values were also noted as an issue during the consultation process, in particular the project team heard that residents living near tourist campgrounds will see their property values decrease as a result of campground expansions or the creation of new campgrounds. While changes in land use planning policy and regulations may affect property values, these changes are not indicative of whether a change represents good land use planning and are not taken into consideration when evaluating the appropriateness of planning decisions. |

2.2 Options

The table above identifies, in brief, numerous options for addressing the identified issues and comments received. Generalized options indicated in the table above are discussed in greater detail below.

2.2.1 Do nothing

Township Council has the option of taking no action in response to one or more of the identified issues. The adopted Official Plan, for example, includes numerous changes incorporated through consultation with stakeholders and may sufficiently address a number of issues and concerns when combined with other tools such as the zoning by-law, site plan control and other by-laws.

2.2.2 Review and Amend the Official Plan

This option is issue-specific and generally relies on amending one or more of the policies in the adopted OP, or it may require a new policy. Commentary regarding current policies and suggested changes for each issue are discussed below:

Water Quality

The issue of Water quality includes direct effects to water such as sewage, pollution, nutrient loading, and the presence of algae. It also includes indirect issues that impact the overall quality of the water such as the increase in stormwater runoff into the lake due to the increase of impermeable surfaces and the removal of shoreline vegetation. Consultation also provided feedback on the studies required to measure water quality such as a Lake Impact Study should be required.

- Section 2.2.1 – Lake Capacity and Assessments
 - Outlines the need for Lake Impact and Lake Capacity Assessments in relation to waterfront development and water quality
- Section 2.2.2 – Water Setback
 - Requires all development or site alteration to be a minimum of 30 metres from the upper controlled water elevation from lakes on the Rideau Canal Corridor or the normal high-water mark of any other water body.
 - The intent is to prevent the disturbance of the shoreline area as a result of the placement of buildings and structures, including sewage systems, or the removal of the soil mantle and natural vegetation in addition to the reduction in phosphorus and other nutrient loads from making it into the lake. It is also to prevent prevent erosion and sedimentation, and improve the habitat of plant, fish and animal species
- Section 2.2.6 – Waterfront Development Policies for Changes to Non-Complying/Non-Conforming Development
 - Ensures development of non-conforming uses may not encroach closer to a lake.
 - Requires the replacement or renovation of septic systems that are non-compliant and that maximize setbacks from the water, also ensures new septic systems are setback from the water.
 - Requires vegetation on land abutting the shoreline.
 - Incorporates stormwater management through vegetation encouragement and the requirement of drainage plans.
- Section 2.20.3 – Fish Habitat and Adjacent Lands
 - Ensures no development or site alteration shall occur within 120 metres of fish habitat areas, unless demonstrated there are no negative impacts by an EIA.
- Section 21.3 – Development Adjacent to Water Bodies
 - Ensures that all developments must conform with all applicable Waterfront Development Policies under section 2.2 of the plan.
- Section 2.21.4 – Stormwater Management
 - Sets evaluation criteria for site plans in relation to storm water design plans.
 - Fosters partnerships with the CRCA and RVCA to utilize water quality data when reviewing development applications.
- Section 2.21.5 – Water Quality Monitoring
 - Speaks to the partnerships the Township has the CRCA, RVCA, and MECP as it relates to water quality data and water quality monitoring programs introduced by the Township

The adopted OP provides sufficient policy framework to support protection of water quality. Any development application on a tourist campground is required to satisfy the policies above. Further refinements to other by-laws may be necessary to align with and implement these OP policies. In addition, the following amendments may also be appropriate:

1. Specify thresholds or triggers for a Lake Impact Assessment or Lake Impact Study under section 2.2.1
2. Add reference to Lake Impact Studies and Lake Capacity Assessments to the Tourist Commercial Policies under section 3.8.5.2

Shoreline

Issues relating to shoreline protection stemmed out of concerns around shoreline modification, erosion, overuse and crowding, alterations, and the objective of keeping shorelines unchanged for the protection of wildlife habitat.

- Section 2.2.2 – Water Setback
 - Requires all development or site alteration to be a minimum of 30 metres from the upper controlled water elevation from lakes on the Rideau Canal Corridor or the normal high-water mark of any other water body
 - The intent is to prevent the disturbance of the shoreline area as a result of the placement of buildings and structures, including sewage systems, or the removal of the soil mantle and natural vegetation in addition to the reduction in phosphorus and other nutrient loads from making it into the lake. It is also to prevent prevent erosion and sedimentation, and improve the habitat of plant, fish and animal species
- Section 2.2.4 – Narrow Channels
 - Identifies a Narrow channel where the distance from shore to shore is less than 150 metres
 - Restricts development of marine facilities in these areas
 - Setout out shoreline frontage requirements for new development
- Section 2.2.6 – Waterfront Development Policies for Changes to Non-Complying/Non-Conforming Development
 - Ensures development of non-conforming uses may not encroach closer to the lake
 - Requires vegetation on land abutting the shoreline
 - Ensures new development shall incorporate a 30-metre strip of unaltered naturalized land abutting the shoreline that may have a modest shoreline access path
- Section 2.6 – Environmentally-Sensitive Development
 - Ensures the maintenance of a 30-metre strip of substantially undisturbed and naturally-vegetated area abutting the length of the shoreline on waterfront properties
 - Ensures where possible development and structure along the shoreline shall not occupy more than 25% of the water frontage
- Section 2.17.2 – Rideau Canal
 - Requires Site Plan Control development for all lands adjacent to the Canal which demonstrates the extent to which vegetation within 30 metres of the shoreline will remain undisturbed and mitigation measures where alteration has taken place previously
- Section 2.21.3 – Development Adjacent to Water Bodies
 - Ensures that all developments must conform with all applicable Waterfront Development Policies under section 2.2 of the plan
- Section 3.8.5.2 – Tourist Commercial Policies
 - In the review of applications efforts shall be made to integrate waterfront tourist commercial uses with the shoreline environment so as to minimize visual and other impacts, in accordance with the Environmentally-Sensitive Development section of the Plan

As with Water Quality, the adopted OP provides a robust framework for protecting shorelines. One possible amendment to the OP is to introduce a policy that requires improvement to the shoreline for any development or

changes to existing tourist campgrounds. The zoning by-law can also be amended to capture some of the policies noted above.

Septic Systems

The MECP is the regulatory body associated with the review of large septic systems that treat more than 10,000 litres per day, which applies to a majority of the campgrounds in the area. The comments frequently heard regarding septic systems were concerns over the resources for regulating such systems, the quality of septic systems, the impacts of insufficient systems, and the guidelines associated with them.

- Section 2.2.1 – Lake Capacity and Assessments
 - Ensures that septic systems shall be placed in an optimal location to minimize impact
- Section 2.2.6 – Waterfront Development Policies for Changes to Non-Complying/Non-Conforming Development
 - The replacement of existing systems or the installation of new systems shall maximize water setback, and may require specialized studies and reports from septic installers
 - Existing septic systems which are determined to be non-compliant may require replacement or upgrades in addition to proof the system is functioning properly
- Section 2.14.1 – Changes to Non-conforming Uses involving Extension or Enlargements
 - Requires proposed extensions or enlargements on or adjacent to the waterfront to not remove the ability for future complying septic systems to be located on the property away from sensitive environmental areas
- Section 2.21.1 – Potable Water Supply and Waste Water Treatment
 - Policy to encourage the regular maintenance of waste water treatment systems and the upgrading or replacement of substandard systems, which may be promoted through the Township's commitment to an annual septic re-inspection program
- Section 2.21.2 – Source Water Protection
 - As resources permit, the Township will encourage and support a septic system inspection program

The municipality has limited authority to establish policies or regulations surrounding large scale septic systems, though the zoning by-law can incorporate required setbacks and the OP can include policies concerning the types of impacts the Township seeks to avoid. The adopted OP policies align with the prevailing intent of the concerns and issues expressed to the project team. There may be opportunities to strengthen the OP policies slightly to provide municipal staff with greater authority during the review of development applications, however the OP already provides sufficient direction to this effect. As large septic systems are already regulated by the province, there are few to no meaningful changes that the municipality can make to other municipal by-laws that could affect the placement or regulation of septic systems directly. Instead, options relating to other themes such as water quality, lake impact, etc. can be explored to reduce potential negative impacts from septic systems on waterbodies. The zoning by-law can also be amended to capture some of the policies noted above.

Lake Impact

The theme of Lake Impact includes the increase of impermeable surfaces, densification of tourist campgrounds, and the removal of trees and vegetation. It also includes impact due to spills, pollution and introduction of invasive species from boats as well as impacts from septic systems such as nutrient loading (e.g. increase in phosphorous levels).

- Section 2.2.1 – Lake Capacity and Assessments
 - Outlines the need for Lake Impact and Lake Capacity Assessments in relation to waterfront development and water quality and ensures that septic is placed in a suitable location.
- Section 2.2.6 – Waterfront Development Policies for Changes to Non-Complying/Non-Conforming Development

- The replacement of existing systems or the installation of new systems shall maximize water setback, and may require specialized studies and reports from septic installers
- Existing septic systems which are determined to be non-compliant may require replacement or upgrades in addition to proof the system is functioning properly
- Section 2.14.1 – Changes to Non-conforming Uses involving Extension or Enlargements
 - Requires proposed extensions or enlargements on or adjacent to the waterfront to not remove the ability for future complying septic systems to be located on the property away from sensitive environmental areas
- Section 5.11 – Complete Applications
 - Notes a Lake Impact Study as one of the requirements in support of an application

The adopted OP provides sufficient policy framework for the Township to require Lake Impact Studies through the development application process. Any development application on a tourist campground is required to conform to the policies above, among others. The zoning by-law can also be amended to capture some of the policies noted above. In addition, the following amendments may also be appropriate:

1. Specify thresholds or triggers for a Lake Impact Assessment or Lake Impact Study under section 2.2.1
2. Add reference to Lake Impact Studies and Lake Capacity Assessments to the Tourist Commercial Policies under section 3.8.5.2

Noise

The issue of Noise can be broken into three areas. The first being noise emitted from campgrounds due to activities and the number of people located on the site at varying hours of the day, The second is the emission of noise from watercraft. The third is the impacts noise has caused on quality life and its potential impacts on wildlife.

Under the Township of Rideau Lakes new Official Plan, the sections of the Plan related to Noise are as follows below:

- Section 2.16.5 – Other Land Use Compatibility Policies
 - Certain land uses such as residences, day care centres and educational and health facilities may be particularly sensitive to the effects of odour, noise, vibration and other emissions associated with facilities such as transportation corridors and various types of industries.

The adopted OP does not provide strict guidance as it is related to noise relative to tourist campgrounds. A possible way to strengthen OP policies as they relate to noise could be as follows:

1. Create policy to address the effects of noise as it relates to land use compatibility for uses abutting a Tourist Commercial use.

Density

The issue of density covers a variety of interrelated concerns and comments. Primarily however, the comments deal with regulating density within campgrounds as well as the density of the number of campgrounds in a given area. Impacts of density on the environment, water table, and water quality were raised as was the perception that density is not being sufficiently regulated. The adopted OP has a number of policies that speak to density at a high level as well as the impacts of density, as follows:

- Section 2.2 – Waterfront Development Policies
 - Recognizes that waterfront areas of the Township are overall low density development that are also distinguished by the presence of other long-standing uses that are functionally-related to the water such as tourist campgrounds in addition to cottages
- Section 2.2.7 – Further Preservation of Waterfront areas

- Development shall have regard to the Water Resources and Waste Water Treatment section of this Plan so water is protected from stormwater runoff that is affected by the scale, density or physical form of development
- Section 3.8.1 – Intent of the Rural Designation
 - Recognition that while the predominant built form is low density, limited commercial development is permitted
- Section 3.8.5.2
 - Recognition that tourist campgrounds are significant development due to potential environmental and community impacts and that density is an important component to manage environmental and land use compatibility. This section notes the zoning by-law will identify density provisions to mitigate these concerns
- Section 5.5.6 – Increased Height and Density By-laws
 - Increase in density otherwise permitted in the zoning by-law. May be granted in return for the provision of services, facilities or matters set out in the by-law

The OP does not establish limits on density of tourist campgrounds which requires the consideration of some amendments. The zoning by-law can also be amended to capture some of the policies noted above. The amendments to consider are noted below:

1. Establish density limits in the Official Plan and/or zoning by-law associated with the tourist campground use. Specifically, these could limit the number of camp sites based on the length of shoreline, property area, useable area (which would need to be defined), or establishing a minimum size of campsite. These options are all highly prescriptive and generally better suited to a zoning by-law than an OP.
2. Establish limits in the OP and/or zoning by-law that prescribe a maximum number of campgrounds within a on a waterbody or geographic area or that establish other requirements requiring separation. For example, instead of limiting the number of campgrounds in a geographic area, the OP/zoning by-law could limit the number of campgrounds on a given water body.

Tree Cover

The issue of tree cover is an issue which covered multiple themes which first included the impacts of tree loss on the environment in addition to the creation of hardened surfaces due to tree loss. Second was the need to regulate tree cutting with guidelines and directive from conservation authorities. Third and final were ways to implement the reforestation projects.

- Section 2.2 – Waterfront Development Policies
 - It is the policy of this Plan that minimum disturbances and limited removal of vegetation occur beyond that required for development. tree cutting by-laws and site alteration by-laws as authorized in the Municipal Act, as well as Site Plan Control may be utilized by the Township for this purpose.
- Section 2.22.1 – Climate Change and Sustainability
 - Promote incentives and programs that increase tree planting
- Section 3.8.1 – Intent of the Rural Designation
 - Recognition that overall development will be consistent and retain natural and cultural heritage landscapes including the maintenance of the it tree-covered and large open areas
- Section 5.11 – Complete Applications
 - Notes a Tree Conservation and Protection Plan as one of the requirements in support of an application

The adopted OP does not provide strict policies relating to tree cover however, there are some amendments that may be made to the OP as follows:

1. Create policy which enforces improvement to the shoreline for any new development or development to existing tourist campgrounds to ensure the shoreline remains in a more natural state.

Habitat

The issue of Habitat brought out concerns regarding increased density, shoreline degradation, boat docking, and potential expansion into areas that contain species at risk.

- Section 2.2.2 – Water Setback
 - Requires all development or site alteration to be a minimum of 30 metres from the upper controlled water elevation from lakes on the Rideau Canal Corridor or the normal high-water mark of any other water body
 - The intent is to prevent the disturbance of the shoreline area as a result of the placement of buildings and structures, including sewage systems, or the removal of the soil mantle and natural vegetation in addition to the reduction in phosphorus and other nutrient loads from making it into the lake. It is also to prevent prevent erosion and sedimentation, and improve the habitat of plant, fish and animal species
 - Alteration may be permitted within the 30 metres but will subject to the Environmentally Sensitive Development, Fish Habitat and Adjacent Lands, and the Environmental Impact Assessments sections of the Official Plan
- Section 2.18.3 – Steep Slopes
 - Recognition that development on steep slopes can have significant negative impacts on wildlife habitat and requires a geotechnical study reviewed by the CRCA, RVCA, in addition to Parks Canada to ensure the massing and location of buildings, structures, driveways and other features, limit the extent of alteration to the landscape and natural vegetation
- Section 2.18.5 – Wildland Fire Hazards
 - Wildland fire mitigation measures may occur within a significant wildlife habitat pending an EIA which must indicate there are no negative impacts
- Section 2.20.3 – Fish Habitat and Adjacent Lands
 - Ensures no development or site alteration shall occur within 120 metres of fish habitat areas, unless demonstrated there are no negative impacts by an EIA
- Section 2.20.4 – Wildlife Habitat and Adjacent Lands
 - Constitutes all wetlands as a significant wildlife habitat and prohibits development within any provincially-significant wetland and permits development within a locally-significant wetland only if it can be demonstrated there are no negative impacts through an EIA
 - Site alteration such as filling, grading and excavating on adjacent lands within 120 metres of significant wildlife habitat or on lands where there is a reasonable potential for negative impacts upon the natural features or ecological functions may require an EIA
- Section – 2.20.5 Endangered Species and Threatened Species Habitat and Adjacent Lands
 - Development may be permitted on adjacent lands within 120 metres of a significant habitat subject to an EIA demonstrating there will be no negative impact on the habitat
- Section – 2.20.6 – Woodlands and Adjacent Lands
 - Development shall not be permitted within 120 metres unless an EIA demonstrates there will be no negative impacts on the natural features or their ecological functions.
- Section 21.3 – Development Adjacent to Water Bodies
 - Ensures that all developments must conform with all applicable Waterfront Development Policies under section 2.2 of the plan

- Section 5.11 – Complete Applications
 - Notes an Environmental Impact Assessment as one of the requirements in support of an application

The adopted OP provides a robust framework for protecting wildlife habitat, and the zoning by-law can also be amended to capture some of the policies noted above. The options for strengthening policies around habitat are as follows:

1. Increase the buffer area around lands adjacent to natural heritage features.

Boat Traffic

The issue of Boat Traffic was identified as a factor generated by increased numbers of campground users. This issue also included comments surrounding the size of docking and shoreline regulations, and also the impact of boat traffic on the environment.

Under the Township of Rideau Lakes new Official Plan, the sections of the Plan related to Boat Traffic are as follows below:

- Section 2.2.5 – Boat Capacity
 - Recognition that there are no current boat capacity issues in the Township
 - Requires large-scale water-oriented development projects will be required to consult with the approval authority and if applicable, Parks Canada during the preparation of a concept to assess the effect of development on safe and enjoyable navigation of the Rideau Canal and inland lakes
- Section 5.11 – Complete Applications
 - Notes a Boat Capacity Study as one of the requirements in support of an application

The adopted OP does not establish the trigger or thresholds for a Boat Capacity, nor does the OP recognize boat traffic as an issue. Further refinement to the OP policies around Boat Traffic should consider:

1. Specify thresholds or triggers for a Boat Capacity Study under section 2.2.5.

Clarity/Process

The issue of Clarity/Process was raised in relation to regulatory guidelines for septic systems, trailer types, how expansion should take place, the definition of tourist campgrounds, and associated policies and regulations (e.g. zoning compliance and legal non-conformity).

- Section 1.1 – Intent of the Plan
 - Embracing an evidence-based decision making system will help the community benefit and share responsibility for one of Canada's most unique and diverse ecological and natural landscapes
- Section 2.2.1 – Lake Capacity and Assessments
 - Ensures that septic systems shall be placed in an optimal location to minimize impact
 - Outlines the need for Lake Impact and Lake Capacity Assessments in relations to waterfront development and water quality
- Section 2.2 – Waterfront Development Policies
 - Recognizes that waterfront areas of the Township are overall low density development that are also distinguished by the presence of other long-standing uses that are functionally-related to the water such as tourist campgrounds in addition to cottages
- Section 2.2.6 – Waterfront Development Policies for Changes to Non-Complying/Non-Conforming Development
 - Ensures development of non-conforming uses may not encroach closer to the lake

- Requires the replacement or renovation of septic systems that are non-compliant that maximizes setbacks from the water, and ensures new septic systems are setback from the water
- Requires vegetation on land abutting the shoreline
- Incorporates stormwater management through vegetation encouragement and the requirement of drainage plans
- The replacement of existing systems or the installation of new systems shall maximize water setback, and may require specialized studies and reports from septic installers
- Existing septic systems which are determined to be non-compliant may require replacement or upgrades in addition to proof the system is functioning properly
- Ensures new development shall incorporate a 30-metre strip of unaltered naturalized land abutting the shoreline that may have a modest shoreline access path
- Section 2.14.1 – Changes to Non-conforming Uses involving Extension or Enlargements
 - Requires proposed extensions or enlargements on or adjacent to the waterfront to not remove the ability for future complying septic systems to be located on the property away from sensitive environmental areas
- Section 2.21.1 – Potable Water Supply and Waste Water Treatment
 - Policy to encourage the regular maintenance of waste water treatment systems and the upgrading or replacement of substandard systems, which may be promoted through the Township's commitment to an annual septic re-inspection program
- Section 2.21.2 – Source Water Protection
 - As resources permit, the Township will encourage and support a septic system inspection program
- Section 3.8.1 – Intent of the Rural Designation
 - Recognition that while the predominant built form is low density, limited commercial development is permitted
- Section 3.8.5.2
 - Recognition that tourist campgrounds are significant development due to potential environmental and community impacts and that density is an important component to manage environmental and land use compatibility. This section notes the zoning by-law will identify density provisions to mitigate these concerns
- Section 5.5.6 – Increased Height and Density By-laws
 - Increase in density otherwise permitted in the zoning by-law. May be granted in return for the provision of services, facilities or matter set out in the by-law
- Section 5.11 – Complete Applications
 - Notes all potential required studies for a complete application

The adopted OP policies align with the prevailing intent of the concerns and issues expressed to the project team. However, there may be opportunities to strengthen the OP policies slightly to provide municipal staff with greater authority during the review of development applications. The zoning by-law can also be amended to capture some of the policies noted above. There are therefore a number of amendments to consider:

1. Establish density limits in the Official Plan and/or zoning by-law associated with the tourist campground use. Specifically, these could limit the number of camp sites based on the length of shoreline, property area, useable area (which would need to be defined), or establishing a minimum size of campsite. These options are all highly prescriptive and generally better suited to a zoning by-law than an OP.

2. Establish limits in the OP and/or zoning by-law that prescribe a maximum number of campgrounds within a on a waterbody or geographic area or that establish other requirements requiring separation. For example, instead of limiting the number of campgrounds in a geographic area, the OP/zoning by-law could limit the number of campgrounds on a given water body.
3. Clarify that EIA's are generally peer-reviewed by Conservation Authorities and the Township will continue to send EIA's submitted with development applications for peer review
4. Expand the adjacent land buffer for locally significant wetlands under section 2.20.1
5. Establish guiding policies regarding Z-241 trailers
6. Create a new definition for the Tourist Commercial designation and permitted development in relation to park model trailers

Lighting

Stakeholders raised concerns about the impact of light pollution in the rural area and on wildlife.

- Section 2.2.5 – Environmentally-Sensitive Development
 - Seeks to implement a “dark skies” policy where practical in relation to private property to minimize light pollution and spill-over
- Section 2.14.1 – Changes to Non-conforming Uses involving Extension or Enlargements
 - Applications are assessed for appropriateness with regard to lighting, which also ensures neighbouring uses are protected from it effects
- Section 5.4 – Site Plan Control
 - Used as planning tool to ensure that design details such as lighting are adequate

The adopted OP provides clear guidance for staff and applicants with respect to expectations and requirements to be adhered to during the site plan control process. Additional clarity could be added to the OP as follows:

1. Introduce a policy requiring that Tourist Commercial uses, specifically, demonstrate conformity with section 2.6 to reduce light spillover and that this is to be implemented through site plan control.

Wetlands

The issue of wetlands discovered during the consultation process were concentrated around development in proximity to or within wetlands, the need to protect them, and how they are to be classified.

- Section 2.17.2 – Rideau Canal
 - Recognition that the Rideau Canal has several provincially significant wetlands
 - Subject to the Provincially Significant Wetlands section of this Plan
- Section 2.18.3 – Steep Slopes
 - Recognition that development on steep slopes can have significant negative impacts on wetlands and requires a geotechnical study reviewed by the CRCA, RVCA, in addition to Parks Canada to ensure the massing and location of buildings, structures, driveways and other features, limit the extent of alteration to the landscape and natural vegetation
- Section 2.18.5 – Wildland Fire Hazards
 - Prohibits wildland fire mitigation measures on lands designated as Provincially Significant wetlands or within adjacent areas.
- Section 2.20.1 – Wetlands and Adjacent Lands
 - Development or alteration shall be permitted on lands adjacent to wetlands providing an EIA has demonstrated there will be no negative impacts on the wetland's natural features or their ecological and hydrologic functions
 - Adjacent lands for a Provincially Significant Wetland are 120 metres

- Adjacent lands for a locally significant wetland are 30 metres
- Section 2.20.4 – Wildlife Habitat and Adjacent Lands
 - Constitutes all wetlands as a significant wildlife habitat and prohibits development within any provincially-significant wetland and permits development within a locally-significant wetland only if it can be demonstrated there are no negative impacts through an EIA
 - Site alteration such as filling, grading and excavating on adjacent lands within 120 metres of significant wildlife habitat or on lands where there is a reasonable potential for negative impacts upon the natural features or ecological functions may require an EIA
- Section 3.4.2 – Natural Heritage A (Provincially Significant Wetlands)
 - No development or alteration permitted
- Section 3.6.2 – Natural Heritage C (Locally Significant Wetlands)
 - permitted uses shall generally include only those related to conservation, wildlife management and outdoor recreation activities that do not require negative alteration to the natural features
- Section 5.11 – Complete Applications
 - Notes an Environmental Impact Assessment as one of the requirements in support of an application

The adopted OP provides a robust framework for protecting Wetlands, which sufficiently addresses the majority of issues and concerns expressed to the project team. However, there are some potential additions which can be made to the OP to strengthen such policies which are as follows:

1. Clarify language to indicate most EIA's are already being peer-reviewed by Conservation Authorities
2. Expand the adjacent land buffer for locally significant wetlands under section 2.20.1

Environment

The Environment was raised as an umbrella concern which overlaps broadly with a number of other issues. The options related to this issue therefore also overlap significantly with those of other issues. In addition to the need for regulation, consultation also identified partner regulatory authorities such as Parks Canada and MNRF and their role in helping mitigate environmental impact.

- Section 1.4 – Our Objectives
 - Goals of the plan include improving the quality of the environment, preserving and enhancing waterbodies and the shoreline environment, enhancing the natural environment, and working with public health agencies build the natural environment
- Section 2.2.1 – Lake Capacity and Assessments
 - Outlines the need for Lake Impact and Lake Capacity Assessments in relations to waterfront development and water quality
- Section 2.2.2 – Water Setback
 - Requires all development or site alteration to be a minimum of 30 metres from the upper controlled water elevation from lakes on the Rideau Canal Corridor or the normal high-water mark of any other water body
 - The intent is to prevent the disturbance of the shoreline area as a result of the placement of buildings and structures, including sewage systems, or the removal of the soil mantle and natural vegetation in addition to the reduction in phosphorus and other nutrient loads from making it into the lake. It is also to prevent prevent erosion and sedimentation, and improve the habitat of plant, fish and animal species

- Alteration may be permitted within the 30 metres but will subject to the Environmentally Sensitive Development, Fish Habitat and Adjacent Lands, and the Environmental Impact Assessments sections of the Official Plan
- Section 2.2.4 – Narrow Channels
 - Identifies a Narrow channel where the distance from shore to shore is less than 150 metres
 - Restricts development of marine facilities in these areas
 - Setout out shoreline frontage requirements for new development
- Section 2.2.5 – Boat Capacity
 - Recognition that there are no current boat capacity issues in the Township
 - Requires large-scale water-oriented development projects will be required to consult with the approval authority and if applicable, Parks Canada during the preparation of a concept to assess the effect of development on safe and enjoyable navigation of the Rideau Canal and inland lakes
- Section 2.6 – Environmentally-Sensitive Development
 - Ensures the maintenance of a 30-metre strip of substantially undisturbed and naturally-vegetated area abutting the length of the shoreline on waterfront properties
 - Ensures where possible development and structure along the shoreline shall not occupy more than 25% of the water frontage
- Section 2.17.2 – Rideau Canal
 - Requires Site Plan Control development for all lands adjacent to the Canal which demonstrates the extent to which vegetation within 30 metres of the shoreline will remain undisturbed and mitigation measures where alteration has taken place previously
 - Recognition the Rideau Canal has several provincially significant wetlands
 - Subject to the Provincially Significant Wetlands section of this Plan
- Section 2.18.3 – Steep Slopes
 - Recognition that development on steep slopes can have significant negative impacts on wildlife habitat and requires a geotechnical study reviewed by the CRCA, RVCA, in addition to Parks Canada to ensure the massing and location of buildings, structures, driveways and other features, limit the extent of alteration to the landscape and natural vegetation
- Section 2.18.5 – Wildland Fire Hazards
 - Allows development in hazardous forest types where risk is mitigated in accordance with wildland fire assessment and mitigation standards, as identified by the Ministry of Northern Development, Mines, Natural Resources and Forestry.
- Section 2.20.1 – Wetlands and Adjacent Lands
 - Development or alteration shall be permitted on lands adjacent to wetlands providing an EIA has demonstrated there will be no negative impacts on the wetland's natural features or their ecological and hydrologic functions
 - Adjacent lands for a Provincially Significant Wetland are 120 metres
 - Adjacent lands for a locally significant wetland are 30 metres
- Section 2.20.2 – Areas of Natural and Scientific Interest (ANSIs) and Adjacent Lands
 - Ensures no development or site alteration shall occur within 120 metres of provincially significant or identified candidate ANSI, unless demonstrated there are no negative impacts by an EIA
- Section 2.20.3 – Fish Habitat and Adjacent Lands

- Ensures no development or site alteration shall occur within 120 metres of fish habitat areas, unless demonstrated there are no negative impacts by an EIA
- Section 2.20.4 – Wildlife Habitat and Adjacent Lands
 - Constitutes all wetlands as a significant wildlife habitat and prohibits development within any provincially-significant wetland and permits development within a locally-significant wetland only if it can be demonstrated there are no negative impacts through an EIA
 - Site alteration such as filling, grading and excavating on adjacent lands within 120 metres of significant wildlife habitat or on lands where there is a reasonable potential for negative impacts upon the natural features or ecological functions may require an EIA
 - Section – 2.20.5 Endangered Species and Threatened Species Habitat and Adjacent Lands
 - Development may be permitted on adjacent lands within 120 metres of a significant habitat subject to an EIA demonstrating there will be no negative impact on the habitat
- Section – 2.20.6 – Woodlands and Adjacent Lands
 - Development shall not be permitted within 120 metres unless an EIA demonstrates there will be no negative impacts on the natural features or their ecological functions.
- Section 2.20.7 – Environmental Impact Statement
 - Provides the requirements of an EIA and notes that recommendations of the EIA be altered based on the recommendation of the relevant Conservation Authority or applicable provincial ministry
 - In reviewing environmental impact assessment submissions, the approval authority will consult with independent professionals and other bodies such as the relevant Conservation Authority, as required and the Township, at its discretion, may recover the cost of any peer review of professional and technical studies
- Section 2.21.1 – Potable Water Supply and Waste Water Treatment
 - Policy to encourage the regular maintenance of waste water treatment systems and the upgrading or replacement of substandard systems, which may be promoted through the Township's commitment to an annual septic re-inspection program
- Section 2.21.2 – Source Water Protection
 - As resources permit, the Township will encourage and support a septic system inspection program
- Section 2.21.3 – Development Adjacent to Water Bodies
 - Ensures that all developments must conform with all applicable Waterfront Development Policies under section 2.2 of the plan
- Section 2.21.4 – Stormwater Management
 - Sets evaluation criteria for site plans in relation to storm water design plans
 - Utilizes partnerships with the CRCA and RVCA to utilize water quality data when reviewing development applications
- Section 2.21.5 – Water Quality Monitoring
 - Speaks to the partnerships the Township has with the CRCA, RVCA, and MECP as it relates to water quality data and water quality monitoring programs introduced by the Township
- Section 2.21.3 – Development Adjacent to Water Bodies
 - Ensures that all developments must conform with all applicable Waterfront Development Policies under section 2.2 of the plan
- Section 5.11 – Complete Applications

- Notes an Environmental Impact Assessment as one of the requirements in support of an application

The adopted OP provides a robust framework for protecting the Environment, which sufficiently addresses a majority of the issues and concerns expressed to the project team. This is done through buffering around areas of natural heritage, waterfront development, and the required studies which may be required if work is to happen adjacent to such lands. The zoning by-law can also be amended to capture some of the policies noted above. However, there are a number of potential additions which can be made to the OP to strengthen such policies which are as follows:

1. The introduction of Lake Impact Studies and Lake Capacity Assessments to the Tourist Commercial Policies under section 3.8.5.2
2. Create policy requiring EIA's be peer-reviewed
3. Expand the adjacent land buffer for locally significant wetlands under section 2.20.1
4. Establish density limits in the Official Plan and/or zoning by-law associated with the tourist campground use. Specifically, these could limit the number of camp sites based on the length of shoreline, property area, useable area (which would need to be defined), or establishing a minimum size of campsite. These options are all highly prescriptive and generally better suited to a zoning by-law than an OP.
5. Establish limits in the OP and/or zoning by-law that prescribe a maximum number of campgrounds within a on a waterbody or geographic area or that establish other requirements requiring separation. For example, instead of limiting the number of campgrounds in a geographic area, the OP/zoning by-law could limit the number of campgrounds on a given water body.
6. Specify thresholds or triggers for a Boat Capacity Study under section 2.2.5.

Rural Character

The issue of Rural Character had two major themes, being the impacts of denser development on the feel of the rural setting and loss of privacy.

- Section 2.2 – Waterfront Development Policies
 - Recognizes that waterfront areas of the Township are overall low density development that are also distinguished by the presence of other long-standing uses that are functionally-related to the water such as tourist campgrounds in addition to cottages
- Section 2.16.5 – Other Land Use Compatibility Policies
 - Policy of the Official Plan to minimize conflicts between land uses through the implementation of distance separations and buffering to mitigate adverse effects
- Section 3.8.1 – Intent of the Rural Designation
 - Recognition that while the predominant built form is low density, limited commercial development is permitted
- Section 3.8.5.2
 - Recognition that tourist campgrounds are significant development due to potential environmental and community impacts and that density is an important component to manage environmental and land use compatibility. This section notes the zoning by-law will identify density provisions to mitigate these concerns

Although the OP provides general direction with respect to recognizing and preserving the Township's rural character, introducing policies limiting density of campgrounds may address the concerns raised surrounding rural character. The zoning by-law can also be amended to capture some of the policies noted above. The possible Official Plan amendments are noted below:

1. Establish density limits in the Official Plan and/or zoning by-law associated with the tourist campground use. Specifically, these could limit the number of camp sites based on the length of

shoreline, property area, useable area (which would need to be defined) or establishing a minimum size of campsite. These options are all highly prescriptive and generally better suited to a zoning by-law than an OP.

2. Establish limits in the OP and/or zoning by-law that prescribe a maximum number of campgrounds within a on a waterbody or geographic area or that establish other requirements requiring separation. For example, instead of limiting the number of campgrounds in a geographic area, the OP/zoning by-law could limit the number of campgrounds on a given water body.

Municipal Services

The issue of Municipal Services was generally focused on the public services received or not received by tourist campgrounds and who was paying for them. However, this issue also included an increase in the use of municipal and third-party services such as road infrastructure, impacts to hydro and telecommunications, and the availability of emergency services such as fire, ambulance and police on congested roads close to campgrounds.

Under the Township of Rideau Lakes new Official Plan, the sections of the Plan related to Municipal Services are as follows below:

- Section 2.3 – Economic Policies
 - Council may deem applications for further residential development as premature until it is satisfied that it has the financial resources to continue to supply municipal services
- Section 2.15 – Road Access
 - The Township is committed to maintaining its current “best efforts” policy with respect to existing and new waterfront development on private roads. Where access to dwellings is provided by private roads, municipal services such as snow ploughing, or road maintenance and improvement are neither available nor the responsibility of the Township.
- Section 2.7.1 Community Improvement Objectives
 - In order to achieve the community improvement objectives, Council intends to use a variety of implementation techniques and to choose the appropriate technique(s) for each improvement initiative. Such techniques may include, but are not limited to, the following:
 - i) Considering requiring a Community Infrastructure Assessment in conjunction with the review of proposals for significant commercial or industrial developments. The assessment should evaluate the current availability, need to upgrade, or potential to provide or collaborate with public agencies to provide, relevant community infrastructure including:
 - water supply and waste water management facilities;
 - storm water infrastructure, particularly where new Low Impact Development best practices are introduced;
 - emergency services;
 - road capacity and condition;
 - on-street or off-street public parking spaces;
 - utility services and use optimization;
 - waste management services;
 - active transportation supportive features and links;
 - community gathering spaces or access to – library, community centre, post-office, grocery store, park improvements or outdoor recreation areas;
 - transportation and accessibility access.

The adopted OP provides sufficient policy framework for the Township to require a Community Infrastructure Assessment to evaluate the impact on existing infrastructure and municipal services from a “significant commercial development” such as a new or expanded tourist campground.

Traffic

The issue of Traffic was mostly concerned with increased volumes of traffic in general and at certain times of the year. It was also an issue concerned with the regulation of speeding and traffic impact studies.

- Section 2.14.1 – Changes to Non-conforming Uses involving Extension or Enlargements
 - In considering applications, applications which create or aggravate traffic generation shall not be approved
 - Traffic conditions on-site and traffic hazards will be kept to a minimum by appropriate design of ingress and egress
- Section 3.8.5.2 – Tourist Commercial Policies
 - Tourist commercial uses shall be located to be readily accessible to tourist traffic with minimum of disruption to adjacent residential uses
 - Has policies which may require the applicant to demonstrate the anticipated traffic volume to ensure the proposed use will comply with the intended function of the access road
 - The United Counties of Leeds and Grenville may require the proponent to submit a traffic impact report prepared by a qualified professional
- Section 4.1 – Transportation (General)
 - Development proposals may require the undertaking of traffic impacts or other studies to identify potential issues and mitigation measures
- Section 5.11 – Complete Applications
 - Notes a Traffic Impact Assessment as one of the requirements in support of an application

The adopted OP provides sufficient policy framework for the Township to require Traffic Impact Assessments through the development application process. Any development application on a tourist campground is required to conform to the policies above, among others. In addition, the following amendments may also be appropriate:

1. Specify thresholds or triggers for a Traffic Impact Assessment.

Wildlife

The issue of Wildlife was generally concerned with specific wildlife and the need to protect and conserve their habitats such as the trumpeter swan, waterfowl, birds, and fish. It was also concerned overfishing and the impacts of development on wildlife from noise and loss of habitat.

- Section 2.18.3 – Steep Slopes
 - Recognition that development on steep slopes can have significant negative impacts on wildlife habitat and requires a geotechnical study reviewed by the CRCA, RVCA, in addition to Parks Canada to ensure the massing and location of buildings, structures, driveways and other features, limit the extent of alteration to the landscape and natural vegetation
- Section 2.18.5 – Wildland Fire Hazards
 - Wildland fire mitigation measures occur in a significant wildlife habitat if an EIA can demonstrate there are to be no negative impacts.
- Section 2.20.1 – Wetlands and Adjacent Lands
 - Development or alteration shall be permitted on lands adjacent to wetlands providing an EIA has demonstrated there will be no negative impacts on the wetland's natural features or their ecological and hydrologic functions
 - Adjacent lands for a Provincially Significant Wetland are 120 metres
 - Adjacent lands for a locally significant wetland are 30 metres
- Section 2.20.2 – Areas of Natural and Scientific Interest (ANSIs) and Adjacent Lands

- Ensures no development or site alteration shall occur within 120 metres of provincially significant or identified candidate ANSI, unless demonstrated there are no negative impacts by an EIA
- Section 2.20.3 – Fish Habitat and Adjacent Lands
 - Ensures no development or site alteration shall occur within 120 metres of fish habitat areas, unless demonstrated there are no negative impacts by an EIA
- Section 2.20.4 – Wildlife Habitat and Adjacent Lands
 - Constitutes all wetlands as a significant wildlife habitat and prohibits development within any provincially-significant wetland and permits development within a locally-significant wetland only if it can be demonstrated there are no negative impacts through an EIA
 - Site alteration such as filling, grading and excavating on adjacent lands within 120 metres of significant wildlife habitat or on lands where there is a reasonable potential for negative impacts upon the natural features or ecological functions may require an EIA
- Section – 2.20.5 Endangered Species and Threatened Species Habitat and Adjacent Lands
 - Development may be permitted on adjacent lands within 120 metres of a significant habitat subject to an EIA demonstrating there will be no negative impact on the habitat
- Section – 2.20.6 – Woodlands and Adjacent Lands
 - Development shall not be permitted within 120 metres unless an EIA demonstrates there will be no negative impacts on the natural features or their ecological functions.
- Section 2.20.7 – Environmental Impact Statement
 - Provides the requirements of an EIA and notes that recommendations of the EIA be altered based on the recommendation of the relevant Conservation Authority or applicable provincial ministry
 - In reviewing environmental impact assessment submissions, the approval authority will consult with independent professionals and other bodies such as the relevant Conservation Authority, as required and the Township, at its discretion, may recover the cost of any peer review of professional and technical studies
- Section 2.21.1 – Potable Water Supply and Waste Water Treatment
 - Policy to encourage the regular maintenance of waste water treatment systems and the upgrading or replacement of substandard systems, which may be promoted through the Township's commitment to an annual septic re-inspection program
- Section 2.21.2 – Source Water Protection
 - As resources permit, the Township will encourage and support a septic system inspection program
- Section 2.21.3 – Development Adjacent to Water Bodies
 - Ensures that all developments must conform with all applicable Waterfront Development Policies under section 2.2 of the plan
- Section 2.21.4 – Stormwater Management
 - Sets evaluation criteria for site plans in relation to storm water design plans
 - Utilizes partnerships with the CRCA and RVCA to utilize water quality data when reviewing development applications
- Section 2.21.5 – Water Quality Monitoring
 - Speaks to the partnerships the Township has with the CRCA, RVCA, and MECP as it relates to water quality data and water quality monitoring programs introduced by the Township
- Section 2.21.3 – Development Adjacent to Water Bodies

- Ensures that all developments must conform with all applicable Waterfront Development Policies under section 2.2 of the plan
- Section 5.11 – Complete Applications
 - Notes an Environmental Impact Assessment and Slope Stability Assessment as potential studies required in support of an application

The adopted OP provides a robust framework for protecting wildlife, however there are a number of possible additions to the OP to strengthen policies around wildlife. The zoning by-law can also be amended to capture some of the policies noted above. The possible Official Plan amendments are as follows:

1. The introduction of Lake Impact Studies and Lake Capacity Assessments to the Tourist Commercial Policies under section 3.8.5.2
2. Create policy requiring EIA's be peer-reviewed
3. Expand the adjacent land buffer for locally significant wetlands.
4. Set density thresholds in the Official Plan associated with the tourist campground designation.

Drinking Water

The issue of drinking water was concerned with the water table, aquifers, and fluctuations in service that were potentially related to the opening and closing of campgrounds. It was also an issue that was concerned with the process of determining water feasibility which are determined through Hydrogeological Assessments.

- Section 2.21.1 – Potable Water Supply and Waste Water Treatment
 - Policy to encourage the regular maintenance of waste water treatment systems and the upgrading or replacement of substandard systems, which may promoted through the Township's commitment to an annual septic re-inspection program
- Section 2.21.2 – Source Water Protection
 - The determination of site suitability for proposed waste water systems may require servicing reports such as hydrogeological investigations, terrain analyses, impact assessments and servicing options reports to the satisfaction of the approval authority including the relevant approval authority for water supply and waste water treatment
 - As resources permit, the Township will encourage and support a septic system inspection program
- Section 5.11 – Complete Applications
 - Notes a Hydrogeological Assessment as one of the requirements in support of an application

The adopted OP provides sufficient policy framework to support protection of Drinking water. Any development application on a tourist campground is required to satisfy the policies above. The following amendments may also be appropriate:

1. Specify a requirement for Hydrogeological Assessment for Tourist Commercial developments, both new proposals and proposals for expansions.
2. Introduce a peer review policy to provide greater clarity to staff and applicants that peer review of hydrogeological assessments is anticipated where such studies are required.

Fire Risk

The issue of Fire Risks revolved around potential fires from electrical systems and the fire created at campgrounds.

- Section 1.4 – Our Objectives
 - Goals of the plan include minimizing the risks to persons from wildland fire
- Section 2.18.5 – Wildland Fire Hazards

- Wildland fire areas have been assessed by the province identifying hazardous forest types associated with high or extreme risk of wildland fire
- Allows for development in hazardous forest types where risk is mitigated in accordance with wildland fire assessment and mitigation standards, as identified by the Ministry of Northern Development, Mines, Natural Resources and Forestry

There are no policies that are associated with the impacts associated with campfires coming from uses such as Tourist Commercial or electrical systems, though the OP does include standard policies with regard to wildland fire hazards.

Air Quality

Concerns regarding the impact of campfires on air quality were received during the process. This issue is understood to be related to the matter of density and campground scale as a single campfire is not likely to be at issue, but the number of campfires in a concentrated area is of greater concern.

- Section 2.16.5 – Other Land Use Compatibility Policies
 - certain land uses such as residences, day care centres and educational and health facilities may be particularly sensitive to the effects of odour, noise, vibration and other emissions associated with facilities such as transportation corridors and various types of industries

The adopted OP contains satisfactory wildland fire policies; however, it does not provide strict guidance as it related to Air Quality relative to tourist campgrounds and campfires. A possible way to strengthen OP policies as they relate to Air Quality could be as follows:

1. Create policy requiring consultation with MECP to determine if an Air Quality ECA is required

Land Use Study

The issue of the land use study was concerned with multiple parts of the study including the proposed options, the consultation process itself including transparency, its comprehensiveness, and the need for the study to be long enough in duration to capture the entirety of the issues at hand. This issue also noted other issues focused on why this study is being done for this form of development, lack of trust with council, and the need for such a study to not be guided by politics. Although not specifically related to tourist campgrounds, the project team felt that this issue should be acknowledged, and Council made aware through this report that this concern exists in the community. The project team and Township staff are committed to completing this study in accordance with professional standards and Council direction.

Non-compliance

The issue of non-compliance relative to the development of tourist campgrounds was focused on the enforcement and circumvention of the zoning by-law, in addition to tourist campgrounds not following their plans for development. This issue also included the enforcement of seasonal dates, the lack of resources to ensure development is orderly, the need for inspections, and the need for the creation of more proactive policies from the Township.

- Section 2.2.6 – Waterfront Development Policies for Changes to Non-Complying/Non-Conforming Development
 - Ensures development of non-conforming uses may not encroach closer to the lake
 - Requires the replacement or renovation of septic systems that are non-compliant that maximizes setbacks from the water, and ensures new septic systems are setback from the water
 - Requires vegetation on land abutting the shoreline
 - Incorporates stormwater management through vegetation encouragement and the requirement of drainage plans
 - The replacement of existing systems or the installation of new systems shall maximize water setback, and may require specialized studies and reports from septic installers

- Existing septic systems which are determined to be non-compliant may require replacement or upgrades in addition to proof the system is functioning properly
- Ensures new development shall incorporate a 30-metre strip of unaltered naturalized land abutting the shoreline that may have a modest shoreline access path
- Section 3.8.5.2 – Tourist Commercial Policies
 - Tourist commercial uses shall be located to be readily accessible to tourist traffic with minimum of disruption to adjacent residential uses
 - Has policies which may require the applicant to demonstrate the anticipated traffic volume to ensure the proposed use will comply with the intended function of the access road
 - The United Counties of Leeds and Grenville may require the proponent to submit a traffic impact report prepared by a qualified professional
- Section 4.1 – Transportation (General)
 - Development proposals may require the undertaking of traffic impacts or other studies to identify potential issues and mitigation measures
- Section 5.11 – Complete Applications
 - Notes a Traffic Impact Assessment as one of the requirements in support of an application

The adopted OP provides sufficient policy framework for the Township relative to non-compliant development. It should also be noted that in order to attain a building permit, all development must conform with the Ontario Building Code and be subjected to inspection by the Township. Any development application on a tourist campground is required to conform to the policies above, among others. In addition, the following amendments may also be appropriate

1. Create policy to set seasonal dates for the Tourist Commercial use under section 3.8.5.2.

Residential Transition/Trailer Types

The issue of Residential Transition/Trailer Types can be broken down into two themes the first being residential drift which is the shift of the trailers to something that is more residential in form and is being utilized for longer periods of time due to its build. The second is trailer types which included comments surrounding the Z-241 (Park model) CSA standard and how they are shifting from something transient to something more permanent that is taking on the form of cottage.

Under the Township of Rideau Lakes new Official Plan, the sections of the Plan related to Residential Drift/Trailer Types are as follows below:

- Section 2.2 – Waterfront Development Policies
 - Recognizes that waterfront areas of the Township are overall low density development that are also distinguished by the presence of other long-standing uses that are functionally-related to the water such as tourist campgrounds in addition to cottages
- Section 3.8.1 – Intent of the Rural Designation
 - Recognition that while the predominant built form is low density, limited commercial development is permitted
- Section 3.8.5.2
 - Recognition that tourist campgrounds are significant development due to potential environmental and community impacts and that density is an important component to manage environmental and land use compatibility. This section notes the zoning by-law will identify density provisions to mitigate these concerns
- Section 5.5.6 – Increased Height and Density By-laws

- Increase in density otherwise permitted in the zoning by-law. May be granted in return for the provision of services, facilities or matter set out in the by-law

The adopted OP does not provide strict guidance as it is related to the trailer types within tourist campgrounds. A possible way to strengthen OP policies as they relate to lighting could be as follows:

1. Create a new definition for the Tourist Commercial designation and the development allowed within it with regard to park model trailers
2. Create policy to set seasonal dates for the Tourist Commercial use

2.2.3 Review and Amend the Zoning By-law

The current zoning by-law has the potential to better regulate tourist campgrounds in alignment with the adopted OP as well as with the potential changes referenced above. The following represents potential amendments to the CT zone and general provisions of the by-law to better capture the intent of the OP:

- a) Increase the current provisions for all yard setbacks abutting a residential use (e.g. increase to 30 metres)
- b) Introduce minimum landscaped open space and/or buffering requirement for campgrounds adjacent to non-commercial or non-industrial uses. This could permit existing vegetation to remain if it provides suitable buffering or could require new vegetation or fencing to provide additional buffering, for example.
- c) Introduce a density metric for the tourist campground use, such as:
 - Number of sites per hectare of the property
 - Number of sites per a given length of frontage
 - Number of sites per a given length of shoreline
 - Number of sites per developable area on the property (developable area to be defined)
 - Minimum area requirement for campsites
 - Minimum separation requirement between campsites
 - Limit to the number of campgrounds or campsites on a waterbody or within a geographic area
- d) Increase the minimum length of waterfrontage for tourist campgrounds either broadly or in relation to the number of campsites.
- e) Introduce enhanced standards for shoreline protection in the zoning by-law for tourist campgrounds specifically.
- f) With regard to section 3.26 of the by-law which speaks to Water Frontage and Water Setbacks, enact the following:
 - Prohibit any kind of accessory structure or building except marine development
 - Change the 30-metre minimum setback to 30 metres from the upper controlled water elevation
- g) With regard to section 3.27 of the by-law which speaks to Yard and Water Setback Encroachments enact the following:
 - Prohibit certain exceptions from applying to the tourist campground use
- h) Provide a policy within the general provisions which prohibits marine facilities on a narrow channel (less than 150 metres shore to shore) as noted in section 2.2.4 of the OP
- i) Provide policy within the general provisions which ensures new development shall incorporate a 30-metre strip of unaltered naturalized land abutting the shoreline that may have a modest shoreline access path as noted in section 2.2.6 of the OP
- j) Introduce a provision that would require a security fence adjacent to a residential or rural land use
- k) Provide provision under section 6.3 which requires new tourist campgrounds to provide a minimum frontage requirement onto a public road

- l) Consider refining the following definitions to provide easier interpretation and ensure they reflect the intent of the by-law and OP:
 - High Water Mark
 - Shoreline
 - Tourist Campground
 - Water Frontage
 - Water Setback
- m) Include new definitions to provide clarity for potential amendments such as:
 - Narrow Channel
 - Modest Access

2.2.4 Review and Amend the Site Plan Control By-law

The current site plan control by-law is a tool to regulate development prior to the issuance of a building permit, this tool may be further amended to address the concerns and issues regarding tourist campgrounds. For example:

- a) Introduce the ability and requirement for the Township to collect securities for on- and off-site works through the site plan control process.
- b) Amend Section 4 (g) as it relates to expansions or additions to trailers to be per campsite and not the entire campground unless related to a communal campground amenity
- c) Require Campgrounds to capture changes in future site plan modifications

2.2.5 Implement a Shoreline Preservation By-law

- a) Implement a Shoreline Preservation By-law which:
 - a) Regulates all lands within a certain distance of the high water mark
 - Establishes a minimum requirement for natural/vegetative cover
 - Limits site alteration such as the placing or dumping of fill, moving or adding rocks, removing topsoil, altering grades in a way that affects the natural drainage of the site, etc.
 - b) Allows for inspection at any reasonable time by a by-law enforcement officer
 - c) Restricts tree removal
 - d) Provides reasonable exemptions for trees that are required to be removed
 - e) Specifies penalties for non-compliance

2.2.6 Implement a Site Alteration By-law

- b) Implement a Site Alteration By-law which:
 - a) Regulates properties over a certain area with respect to the placing or dumping of fill, removing of topsoil, and altering the grade of land. This could address the following impacts:
 - drainage patterns are maintained
 - interference and potential damage to watercourses
 - water quality
 - erosion and sedimentation
 - natural heritage features
 - prevent the use of hazardous or improper fill
 - b) Allows exemptions for minor alterations

- c) Specifies penalties for non-compliance
- d) Utilize section 2.20.4 of the Official Plan which states: "Site alteration such as filling, grading and excavating on adjacent lands within 120 metres of significant wildlife habitat or on lands where there is a reasonable potential for negative impacts upon the natural features or ecological functions may require an EIA"

2.2.7 Implement a Tree Protection (Forest Conservation) By-law

- c) Implementation of a Tree Protection By-law which:
 - a) Regulates properties over a certain area regarding the cutting or removal of trees
 - b) Could provide sufficient exemptions to allow tree removal for:
 - The erection of a type of building or structure and a specified buffer around it
 - The harvesting of trees for personal use as long as the activity does not reduce the number of trees below a certain defined threshold
 - Exemptions for certain land uses (e.g. residential)
 - c) Protects tree cover and natural stormwater retention
 - d) Specifies penalties for non-compliance
 - e) Utilize section 2.20.4 of the Official Plan which states: "Site alteration such as filling, grading and excavating on adjacent lands within 120 metres of significant wildlife habitat or on lands where there is a reasonable potential for negative impacts upon the natural features or ecological functions may require an EIA"

2.2.8 Administrative Penalties By-law

- a) The implementation of an Administrative Penalties By-law under the Municipal Act would allow the Township of Rideau Lakes to issue financial penalties to property owners that do not adhere to other municipal by-laws such as a Shoreline Protection By-law, Site Alteration By-law, Tree Protection By-law, Noise By-law, Open Air Burning By-law etc.

The primary benefit to the municipality of implementing an administrative penalties by-law is that it allows the municipality to impose financial penalties through the issuance of tickets, rather than having to rely on taking non-compliance matters to civil court. Legal clarification regarding the nature of any such fines and whether they can be punitive or whether they should primarily be based on a cost-recovery system is recommended and should be explored as part of the implementation of this option, should Council choose to do so.

2.2.9 Strengthen the Current Noise By-law

- a) Update the Noise By-law to target noise emitted by yelling, shouting, and hollering

2.2.10 Licensing

Require tourist campgrounds to apply for a yearly license which require the campground to:

- a) Provide updated site plans prior to receiving a license
- b) Allow the Township to undertake inspections for compliance with municipal by-laws

2.2.11 Community Planning Permit System

Implement a Community Planning Permit System (CPPS) which would:

- a) Work similarly to a zoning by-law in regulating permitted land uses as well as performance standards such as height, setbacks, density, etc.
- b) Include substantial additional controls that overlap with those of a site plan control by-law and also allows for minor deviations that would require minor variance approval under a zoning by-law.

- c) Operate instead of, rather than in conjunction with, a zoning by-law and site plan control by-law.
- d) Would not permit public appeals, only appeals by the applicant

3.0 Recommendations

The following section discusses and provides accompanying rationale for the Options presented in Section 2 that we recommend for action. Should these recommendations be supported by Township Council, municipally-initiated applications to amend the Official Plan (OP) and zoning by-law will be required. In addition, amendments to the site plan control by-law and noise by-law are recommended, and a number of new by-laws under the Municipal Act will also need to be crafted.

3.1 Do nothing

Upon reviewing the existing policy and regulatory framework as well as the identified issues, it is our opinion that amendments to Planning Act tools are appropriate, as is the creation of new by-laws under the Municipal Act, as discussed further below. We do not recommend the “do nothing” option.

3.2 Official Plan Amendments

The following numbered list captures all of the OP amendments presented above as Options for responding to the identified issues. Options that are crossed out below are not proposed to be implemented while options that are presented in plain text are recommended. Each item in the list below is followed by a brief rationale discussing the reason for our recommendation. We note that as the United Counties are continuing their review of the Township-adopted Official Plan, any amendments

- ~~1. Establish density limits in the Official Plan and/or zoning by-law associated with the tourist campground use. Specifically, these could limit the number of camp sites based on the length of shoreline, property area, useable area (which would need to be defined), or establishing a minimum size of campsite. These options are all highly prescriptive and generally better suited to a zoning by-law than an OP.~~

Rationale: The OP is a policy document rather than a regulatory one. As much as possible, OPs should avoid including highly prescriptive parameters, particularly in the absence of supportive study. A 30-metre shoreline setback is a prescriptive requirement which is reflected in the OP because it is a standard that was preceded by significant study prior to its widespread implementation and adoption in Ontario. Further, the adopted OP provides sufficient basis to support the inclusion of a density metric in the zoning by-law, therefore its inclusion in the OP is not necessary.

- ~~2. Establish limits in the OP and/or zoning by-law that prescribe a maximum number of campgrounds on a waterbody or within a geographic area or establish other requirements requiring separation. For example, instead of limiting the number of campgrounds in a geographic area, the OP/zoning by-law could limit the number of campgrounds on a given water body.~~

Rationale: As above. The OP is not the appropriate tool for providing prescriptive standards limiting the number of campgrounds within a given area. It is our opinion that restricting the number of campgrounds within a geographic area or on a given lake is not appropriate and cannot be supported from a land use planning perspective as it fails to account for the potential impacts of those campgrounds.

3. Create policy which encourages improvement to the shoreline for any new development or development to existing tourist campgrounds to ensure the shoreline remains in a more natural state.

Rationale: Introduction of a policy to this effect would be appropriate in both the section dealing with waterfront development policies for legal non-complying/non-conforming development (section 2.2.6) and the section dealing with Tourist Commercial policies (section 3.8.5.2). Should Council decide to implement a shoreline protection by-law, enabling policies should also be incorporated into these sections. This is in many ways a clarification or supporting policy, as the Township already has a separate Shoreline Buffer Planting Policy in place which is triggered through Site Plan Control.

4. Increase the buffer area around lands adjacent to natural heritage features.

Rationale: The OP currently identifies a number of setbacks or distances that trigger additional study, as follows:

| Feature | Distance (setback or trigger) |
|---|-------------------------------|
| Fish habitat | 120 metres |
| Significant Wildlife Habitat | 120 metres |
| Woodlands | 120 metres |
| Provincially Significant Wetland | 120 metres |
| Locally significant wetland | 30 metres |
| Areas of Natural and Scientific Interest (ANSI) | 120 metres |
| Water setback | 30 metres |

The setbacks and triggers in the Official Plan are generally consistent with best practices and standards throughout Ontario. In addition, an EIA is always required for any proposed development or site alteration within the distances noted above and it is the responsibility of applicants to demonstrate to the satisfaction of any review authorities that no negative impacts will occur.

The typical 30-metre setback from shorelines is the only metric that we determined may warrant closer examination. A study completed by Hutchinson (2014) is employed by a number of conservation authorities and municipalities to determine an appropriate shoreline setback on Canadian Shield lakes. This study provides a methodology that assesses soil depth, soil texture, slope percentage, and vegetation when seeking to determine an appropriate setback for development, which can range between 30 metres and 90 metres. As this method accounts for site-specific parameters, it cannot be used to establish a Township-wide standard, but inclusion of language that allows for or requires an analysis conducted with the method identified by Hutchinson is appropriate to provide greater opportunity to ensure that appropriate setbacks are implemented in Tourist Campgrounds on a site-specific basis.

5. Add reference to Lake Impact Studies and Lake Capacity Assessments to the Tourist Commercial Policies under section 3.8.5.2 and specify appropriate triggers or standards.

Rationale: Applicants seeking to develop a new or expand an existing tourist campground will be required to demonstrate the proposed development would not result in negative impacts on the lake in terms of water quality or capacity. Section 5.11 of the OP allows the Township to require these studies but does not mandate their completion. It is appropriate to specify that such study is required for expansions to existing campgrounds, or proposals to create new campgrounds, which require a zoning by-law amendment or site plan control application. This threshold ensures that appropriate technical studies are completed as part of the evaluation of larger scale campgrounds or expansions, recognizing that small scale expansions that do not require site plan control approval or that require a Committee of Adjustment approval do not necessarily trigger such potentially significant studies. The OP would still allow the Township to require such studies in support of smaller proposals however, should staff or review agencies determine that they are warranted.

6. Specify thresholds or triggers for a Boat Capacity Study under section 2.2.5. And require this study under section 3.8.5.2

Rationale: As with lake capacity studies, the OP allows the Township to require a Boat Capacity Study but the specified trigger is not precise (e.g. the trigger is “[...] *significant docking facilities such as those associated with marinas and large resorts* [...]”). It is our recommendation that the OP specify that proposals for new or expanding campgrounds that require zoning by-law amendments or site plan control approval and that propose to increase the number of boat slips or introduce additional services in support of existing docking facilities on a site be required to undertake a Boat Capacity Study to evaluate the potential impact in terms of boat traffic. This would require amendment to section 3.8.5.2g). This type of study takes into consideration the space required for all boats on the lake, existing and proposed, and identifies potential mitigation measures if any are required.

- ~~7. Clarify that Environmental Impact Studies are generally to be peer-reviewed by Conservation Authorities and the Township will continue to send EIA's submitted with development applications for peer review~~

Rationale: Section 2.20.7 Environmental Impact Assessments of the OP specifies that the Township “[...] *In reviewing environmental impact assessment submissions, the approval authority will consult with independent professionals and other bodies such as the relevant Conservation Authority, as required and the Township, at its discretion, may recover the cost of any peer review of professional and technical studies.*” This policy provides sufficient basis for staff to require peer review of EIA’s. We note that a peer review process ensures that studies are completed in accordance with industry best practices, standard terms of reference where they exist, as well as typical expectations given the characteristics of a site and proposed development.

~~8. Expand the adjacent land buffer for locally significant wetlands under section 2.20.4~~

Rationale: The buffers for locally significant wetlands identified in the OP are consistent with provincial best practices. The inclusion of a requirement to undertake a Hutchinson evaluation may result in greater setbacks for locally significant wetlands adjacent to Canadian Shield lakes.

~~9. Establish guiding policies regarding Z-241 trailers~~

Rationale: The OP is a policy document and is not the appropriate document to address matters as prescriptive as trailer types. Further clarification of Z-241 trailers is discussed below in relation to recommended amendments to the zoning by-law.

~~10. Create a new definition for the Tourist Commercial designation and permitted development in relation to park model trailers~~

Rationale: The OP is a policy document and is not the appropriate document to address matters as prescriptive as trailer types. Further clarification of Z-241 trailers is discussed below in relation to recommended amendments to the zoning by-law.

11. Introduce a policy requiring that Tourist Commercial uses, specifically, demonstrate conformity with section 2.6 to reduce light spillover and that this is to be implemented through site plan control.

Rationale: This recommendation will be consistent with section 2.6 (f) which states “*Attempting to implement a “dark skies” policy, where practical, in relation to lighting on public roads, parks and on private property, in order to minimize light pollution and spill-over*”. Given overall scale of the development, adding this provision to section 3.8.5.2 as a requirement for development applications to demonstrate will just ensure this policy is extended to new and expanding tourist campgrounds.

12. Specify thresholds or triggers for a Traffic Impact Assessment.

Rationale: The threshold for a traffic impact assessment will be for any new or expanding tourist campground requiring a zoning by-law amendment or site plan control approval. This would be addressed under section 3.8.5.2.

~~13. Set density thresholds in the Official Plan associated with the tourist campground designation.~~

Rationale: It is our opinion that density considerations pertaining to tourist campgrounds are better addressed through zoning than through the Official Plan, as these represent highly prescriptive development criteria. The zoning by-law amendment section below discusses density criteria in detail.

14. Specify a requirement for Hydrogeological Assessment for Tourist Commercial developments, both new proposals and proposals for expansions.

Rationale: This requirement is currently noted within section 5.11 regarding complete applications. Clarifying in the Tourist Commercial policies that a hydrogeological assessment will be required to support a proposal for a new tourist campground or significant expansion to an existing campground which would require a zoning by-law amendment or site plan control application would provide clarity for the community and applicants.

~~15. Introduce a peer review policy to provide greater clarity to staff and applicants that peer review of hydrogeological assessments is anticipated where such studies are required.~~

Rationale: Section 5.11 of the OP specifies that any of the studies required in support of a complete application can be sent away for peer review. Where additional clarity regarding EIAs may be appropriate, similar clarification is not necessary in our opinion as it relates to hydrogeological assessments.

~~16. Create policy requiring consultation with MECP to determine if an Air Quality ECA is required~~

Rationale: The MECP advised that an Air Quality ECA would not be required for the activities taking place at tourist campgrounds, and that the Township's noise by-law is the appropriate tool for regulating such activities. Potential air quality impacts from campfires are regulated through the open air burning by-law.

17. Establish seasonal dates for tourist campgrounds in the Tourist Commercial section

Rationale: New and existing tourist campgrounds are seasonal establishments. Ontario Regulation 170/03 specifies that drinking water systems may be designated as seasonal drinking water systems if they do not operate for 60 consecutive days in either a calendar year or every period that begins April 1 in one year to March 31 in the following year.

Septic systems subject to an ECA are required to be identified as seasonal or year-round as part of the ECA application process, however the MECP does not provide specific guidance for what constitutes seasonality in that instance.

For the purposes of providing direction and clarity to applicants and the public, and to ensure that tourist campgrounds remain a commercial and seasonal use, we recommend incorporating the drinking water system standard identified above in an OP policy that applies to the classification of tourist campgrounds.

3.3 Zoning By-law Amendments

The following is a discussion of the zoning by-law amendments identified as options in the previous section of this report. Each amendment or group of amendments is provided below. Items that are not recommended are crossed out and our rationale provided below to discuss and explain our recommendation. In examining these options and developing the recommendations, we reviewed a total of 20 other zoning by-laws in Ontario, including the following:

- Municipality of Brighton
- Township of Drummond North Elmsley
- Township of Central Frontenac
- Township of South Frontenac
- Township of Leeds and the 1000 Islands
- Tay Valley
- Township of Georgian Bay
- Bracebridge
- Township of Montague
- OPS- Kawartha Lakes
- Dysart et al – Haliburton County
- Municipality of Highlands East
- Algonquin Highlands
- Township of Fenelon
- Township of Douro-Dummer
- Municipality of Trent Lakes

- Township of Selwyn
- Township of Verulam
- Town of Bancroft
- Township of Bonnechere Valley

a) Increase the current provisions for all yard setbacks abutting a residential use (e.g. increase to 30 metres)

Rationale: The current yard setbacks in the Tourist Commercial (CT) zone are 10 metres for front, interior side and exterior side yards, and 15 metres for rear yards. In reviewing other zoning by-laws in Ontario for this type of land use, we found that 10 to 15 metres is fairly typical but that a number of municipalities have requirements as low as 3 metres (e.g. Township of Drummond/North Elmsley) and as high as 20 metres (e.g. Township of Georgian Bay).

It is our opinion that the current yard setbacks are appropriate in relation to non-residential uses, however increased setbacks are appropriate adjacent to residential land uses. Our recommendation is therefore to amend the zoning to introduce an increase of **10 metres** to the current setbacks within the CT zone for property lines that abut non-commercial, non-industrial, or non-institutional zones. This increased setback will provide greater separation and privacy between tourist campgrounds and adjacent sensitive uses while maintaining the overall rural character of the Township.

b) Introduce minimum landscaped open space and/or buffering requirement for campgrounds adjacent to non-commercial, non-industrial uses. This could permit existing vegetation to remain if it provides suitable buffering or could require new vegetation or fencing to provide additional buffering, for example.

Rationale: In addition to introducing an enhanced setback adjacent to sensitive uses, our recommendation is to require that a landscaped strip be contained within the increased setback, with a minimum width of 3 metres. This landscaped strip would be permitted to include existing natural vegetation. Introducing this provision allows the Township to ensure that applicants provide vegetative buffering for new or expanded campgrounds adjacent to sensitive uses. The intent of this amendment is also to encourage maintaining natural vegetation along property boundaries.

c) Introduce a density metric for the tourist campground use, such as:

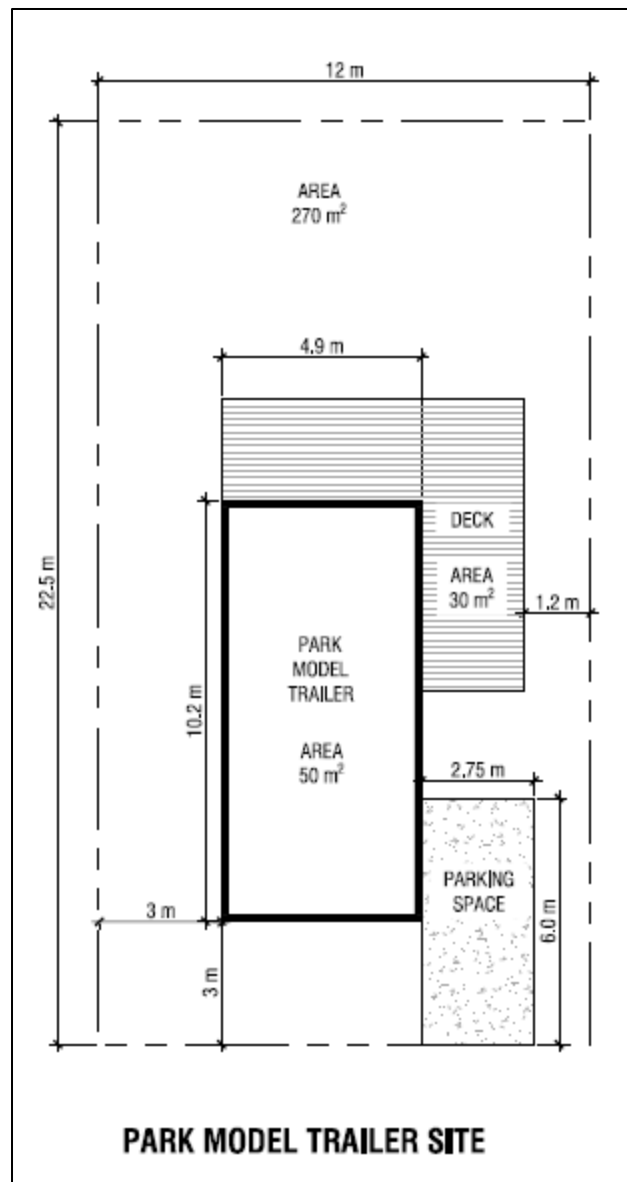
- ~~○ Number of sites per hectare of the property~~
- ~~○ Number of sites per a given length of frontage~~
- ~~○ Number of sites per a given length of shoreline~~
- ~~○ Number of sites per developable area on the property (developable area to be defined)~~
- Minimum area requirement for campsites
- ~~○ Minimum separation requirement between campsites~~
- ~~○ Limit to the number of campgrounds or campsites on a waterbody or within a geographic area~~

Rationale: In reviewing municipal zoning by-laws in Ontario and exploring alternative scenarios for regulating campsite density, we found that there are numerous approaches with varying suitability. The current zoning by-law specifies that each campsite must be provided with a minimum site area of 60 square metres, which establishes a practical limit on the number of campsites that can be developed on a property while accounting for the developable area on a property. For example, each campsite must comply with separation distances from other campsites as well as yard and water setbacks, as well as any other applicable setbacks or separation distances. 60 square metres is generally sufficient for a tent camping site, but does not reflect the size needed to accommodate contemporary travel trailers or park model trailers, which can be up to 50 square metres in area, not accounting for a parking space and any decks or attached structures.

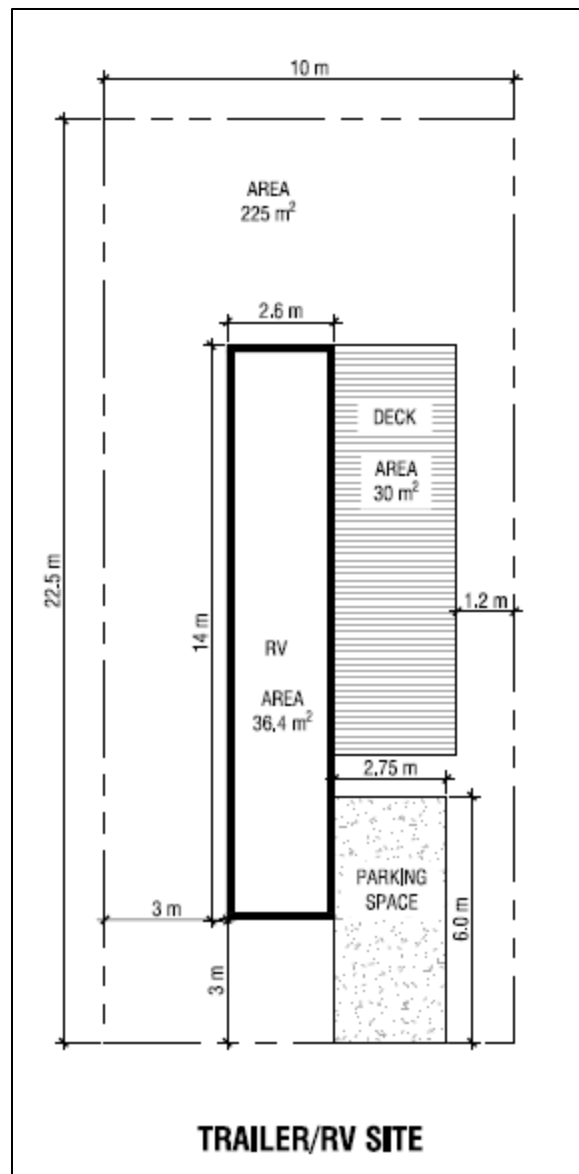
Following a preliminary assessment of the minimum site area requirements for the larger commercially-available trailer types in the travel trailer or park model categories, we have arrived at recommended minimum site areas and other performance standards as set out in the table below:

| | |
|--|--------------------|
| Park Model Trailer Site | |
| Site Area (minimum) | 270 m ² |
| Minimum separation from abutting camp site (minimum) | 3 m |
| Site Coverage (maximum) | 30% |
| Parking Space (maximum) | 1 space |
| Open Deck (maximum) | 30 m ² |
| Trailer/RV Site | |
| Site Area (minimum) | 225 m ² |
| Minimum separation from abutting camp site (minimum) | 3 m |
| Site Coverage | 30% |
| Parking Space (minimum) | 1 |
| Open Deck (maximum) | 30 m ² |

The minimum requirements for park model trailer site area takes into account the existing maximum permitted 30 square metres open deck and maximum Z-241 size of 50 square metres. The minimum site area would ensure that a maximum coverage of 30% could be accommodated on such sites. The figure below illustrates a conceptual site plan based on these provisions:



The minimum requirements for travel trailer or recreational vehicle (RV) site area take into account the existing maximum permitted 30 square metres open deck and maximum size of 36.4 square metres based on our research. The minimum site area would ensure that a maximum coverage of 30% could be accommodated on such sites. The figure below illustrates this configuration conceptually:



As part of the development of this recommendation, we carefully considered options such as a maximum number of sites based on lot area, developable area, shoreline frontage, or usable shoreline frontage. These options were ultimately ruled out as we are not in a position to determine an appropriate metric for any of these based on the limitations of this study. For example, in the absence of hydrogeological or ecological impact assessment, it is not possible for us to determine whether 2, 10, 20, or 50 campsites per hectare can be supported from a technical standpoint. Similarly, a requirement based on waterfrontage in the absence of technical studies that can evaluate shoreline impacts is also not appropriate at this time. Such broad standards would fail to account for individual site characteristics and would be too arbitrary for us to propose at this time.

A minimum site area requirement, as we are proposing, can be arrived at by evaluating the spatial needs of a trailer site based on readily available information. Technical studies completed in support of development applications for new or expanded campgrounds may identify larger or smaller minimum requirements based on individual site characteristics, which would require evaluation as part of the development process.

- d) ~~Increase the minimum length of waterfrontage for tourist campgrounds either broadly or in relation to the number of campsites.~~

Rationale: The current minimum waterfrontage requirement for the Tourist Commercial zone is 60 metres, which is consistent with the overall minimum requirement in the zoning by-law that applies to any use adjacent to a waterbody. When considered alongside the general provision that limits Shoreline Occupancy, a tourist campground is subject to the same limitations that apply to Residential Waterfront-zoned parcels with respect to limitations for shoreline disturbance, including the requirement for site plan control approval. Site plan control approval for tourist campgrounds, however, will require a greater degree of technical study to demonstrate that no negative impacts result than is typical for individual waterfront residential lots.

- ~~e) Introduce enhanced standards for shoreline protection in the zoning by-law for tourist campgrounds specifically.~~

Rationale: This currently would be best addressed by the shoreline protection by-law and policies in the Official Plan which can be implemented through the site plan control process. Section 3.22 of the zoning by-law limits Shoreline Area Occupancy to 20% or 15 metres of the shoreline area for marine facilities, pump houses, stairs, decks, patios, gazebos, and all other accessory buildings and structures. The shoreline area is defined as any portion of a lot within 3 metres of the high water mark. In addition, the implementation of a shoreline preservation or site alteration by-law under the Municipal Act would provide significantly greater control over the types of activities and changes that would be permitted along a shoreline, for new and existing campgrounds. These tool are discussed further below in sections 3.5 and 3.6.

- f) With regard to Water Frontage and Water Setbacks, address permitted development in the encroachment area

- ~~o Prohibit any kind of accessory structure or building except marine development~~

Rationale: Sections 3.22 and 3.26 of the zoning by-law effectively limit the extent of construction permitted along a shoreline and within the water setback. These ensure that proposals to occupy a greater portion of the shoreline or to further encroach into the water setback would require detailed technical analysis through a minor variance or zoning by-law amendment process to demonstrate that no negative impacts result. Site plan control would continue to apply even to proposals that comply with the zoning by-law requirement as well.

- g) With regard to section 3.27 of the by-law which speaks to Yard and Water Setback Encroachments, enact the following:

- o Prohibit certain exceptions from applying to the tourist campground use

Rationale: The following types of encroachments are currently permitted in Section 3.27. Our recommendation is to remove these permissions to limit further impacts within the water setback, recognizing that the intensity of use and the number of users within tourist campgrounds is greater than typical waterfront residential uses:

- *Attached decks and balconies may project from the main building into any water setback by a maximum of:*
 - a. *1.2m where the main building is located less than 8m from the high water mark. This deck shall be limited to 2m² of horizontal surface area;*
 - b. *2m where the main building is equal to or greater than 8m but less than 15m from the high water mark. This deck shall not be limited in horizontal surface area; or*
 - c. *4m where the main building is equal to or greater than 15m. This deck shall not be limited in horizontal surface area*
- *Awnings, clothes poles, flag poles, garden trellises, fences, plant materials, play structures under 10m², temporary event tents, stairs, ramps for accessibility, landings (as minimal as required by the Ontario Building Code) and similar accessory structures shall be permitted in any required yard or water setback*
- *Swimming pools may be located in a required interior side or rear yard, provided that the minimum yard shall be 3m. Swimming pools shall not encroach into the required water setback such that the water setback of the pool would be less than that of any existing noncomplying dwelling or non-residential main building. For the purposes of this section, hot tubs shall not be considered to be swimming pools.*

- *For added clarity, an accessibility deck shall only encroach into the water setback when a main building has a water setback equal to or greater than 8m. An accessibility deck shall maintain the minimum required yard applicable to all other decks*

h) Provide a policy within the general provisions which prohibits marine facilities on a narrow channel (less than 150 metres shore to shore) as noted in section 2.2.4 of the OP

Rationale: The OP includes a policy restricting prohibiting marine facilities on a narrow water channel, which is not currently captured in zoning. A new provision will be added to the Tourist Campground use to implement this policy, which would have the effect of prohibiting new or expanded marine facilities where the distance from shore to shore is 150 metres or less within a navigable water channel.

~~i) Provide policy within the general provisions which ensures new development shall incorporate a 30-metre strip of unaltered naturalized land abutting the shoreline that may have a modest shoreline access path as noted in section 2.2.6 of the OP~~

Rationale: The zoning by-law currently applies limitations on permitted structures within a water setback. A site alteration or shoreline preservation by-law is better suited to regulating the types of site alteration within a water setback than the zoning by-law. Those tools are also generally easier to enforce in combination with an administrative monetary penalties by-law.

~~j) Introduce a provision that would require a security fence adjacent to a residential or rural land use.~~

Rationale: The introduction of a security fence is not warranted as a broad requirement in zoning. Other provisions discussed above would support and require the inclusion of vegetative screening, with a preference for maintaining existing vegetation. Mandating the construction of new security fencing would conflict with the intent of those provisions, however owners and operators of campgrounds would continue to have the option to install security fencing. Further review of proposals on a site-specific basis through the development review and application process may find that security fencing is required in specific situations, and it is our opinion that such situations should be evaluated on a case by case basis rather than imposing a standard in zoning that would introduce a contradictory condition.

k) Provide provision under section 6.3 which requires new tourist campgrounds to provide a minimum frontage requirement onto a public road

Rationale: The CT zone currently requires a minimum frontage of 60 metres. Due to the way in which lot frontage is defined in the zoning by-law for waterfront lots, this requirement indicates that tourist campgrounds are required to provide 60 metres of waterfrontage, but there is presently no minimum road frontage requirement. Section 3.4 of the zoning by-law requires only that such lots provide sufficient road frontage on an improved street to obtain driveway access. Our recommendation is to apply a minimum road frontage requirement of 60 metres for tourist campgrounds to ensure that the extent of frontage on a public road is consistent with the Rural (RU) zone.

l) Consider refining the following definitions to provide easier interpretation and ensure they reflect the intent of the by-law:

○ ~~High Water Mark~~

Rationale: The current definition for High Water Mark is sufficient and is provided below for reference. This definition provides an explanation as what the high water mark is, in addition to recognizing the level varies in accordance with the Rideau Canal.

High Water Mark, shall mean the mark made on the shore or bank of a water body through the action of water, which action has continued over such a long period of time that it has created a difference between the character of the vegetation or soil below the mark and that above the mark, except that in the case of the Rideau Canal the high water mark shall be the upper controlled water elevation. For the purposes of this definition, Rideau Canal shall include the following lakes and their connecting channels: Lower Rideau, Big Rideau, Upper Rideau, Newboro, Loon, Mosquito, Benson, Indian, Clear, Opinicon, Sand and Whitefish Lakes.

- Tourist Campground

Rationale: The current definition for a Tourist Campground is provided below. The definition specifies that tourist campgrounds must be limited to temporary accommodation in tents, trailers, tourist trailers, or recreational vehicles. The term “temporary accommodation” is not defined, nor are the various forms of accommodation. It is our recommendation that the seasonality component referenced above in relation to amending the OP be included in this definition. This will provide the Township with a regulatory mechanism to ensure that tourist campgrounds in fact remain seasonal uses, preventing their use for year-round residency.

Tourist Campground, shall mean any parcel of land which is used to provide temporary accommodation for the public or members of an organization in tents, trailers, tourist trailers or recreational vehicles.

- Water Frontage

Rationale: The current definition for water frontage is provided below and is sufficient. This definition takes into consideration the high watermark and the geographic reality of a shoreline which is unlikely to be linear.

Water Frontage shall mean, in the case of a lot which abuts a water body, the width of such lot measured between the intersections of the side lot lines with a line that is continuously 6 m back from and parallel to the high water mark.

- Water Setback

Rationale: The current definition for water setback is sufficient and is provided below. This definition considers the relation to the high watermark and does not need adjustment or clarification.

Water Setback shall mean, in reference to a water body, the horizontal distance between the high water mark and the nearest building line.

m) Include new definitions to provide clarity for potential amendments such as:

- Narrow Channel

Rationale: In order to implement previous recommendations regarding prohibited uses on a narrow channel, the term must be defined. Our recommendation is to introduce a new definition for this term, based on the definition in the OP.

- Trailer types

Rationale: The zoning by-law currently references tents, trailers, tourist trailers, and recreational vehicles in the definition for a tourist campground. These terms are not defined in the zoning by-law however, nor is a park model trailer. We recommend introducing definitions for these uses either in relation to the tourist campground use or as standalone definitions.

3.4 Site Plan Control By-law Amendments

Three options for amending the site plan control by-law are identified in section 2.2.4 of this report, and our recommendation is that all three options be implemented, as follows.

a) Introduce the requirement for the Township to collect securities for on- and off-site works through the site plan control process.

Rationale: The site plan control process allows municipalities to collect financial securities from applicants to ensure that on- and off-site works be completed in accordance with approved site plan drawings. If applicants choose not to complete works accordingly, collecting financial securities allow the Township to complete the works without burdening the taxpayer. The Township’s site plan control by-law currently does not include the collection of securities, therefore it is our recommendation that the by-law be updated to include this requirement.

- b) Amend Section 4 (g) as it relates to expansions or additions to trailers to be per campsite and not the entire campground unless related to a communal campground amenity

Rationale: The wording of section 4(g) is unclear and not reflective of the intent of the by-law. It is our recommendation that the wording be amended to clarify that site plan control approval is not required for additions of up to 30 square metres on individual camp sites within a 12-month period.

- c) Require Campgrounds to capture changes in future site plan modifications

Rationale: The site plan control by-law does not currently specify that that incremental modifications that do not trigger site plan control approval need to be included in future site plan control approvals. While it is understood that future applications would require existing conditions to be reflected, including a clause that specifies the requirement to reflect existing conditions on a new site plan control application, especially any changes that have occurred following a previous site plan control approval, provides clarity to applicants regarding the application requirements. This also provides Township staff an opportunity to assess the evolution of a tourist campground and require that technical studies reflect the overall condition of campground.

3.5 Shoreline Preservation By-law

A Shoreline Preservation By-law regulates activities within a certain distance of the high water mark regarding alterations to grade, topography, and vegetation. This by-law would be enacted under sections 135 and 142 of the Municipal Act and combines aspects of tree protection and site alteration contained in that legislation to define an area wherein certain activities are prohibited without prior approval from the Township. Such a by-law is a powerful tool that would allow the Township to limit activities within a defined distance from the high water mark regardless of whether other applications under the Planning Act are pursued. Existing conditions would generally be permitted to continue, but changes that contravene this by-law would not be permitted, even for existing campgrounds. A Shoreline Preservation By-law can be written to permit minor activities such as landscape maintenance, pruning of trees, and creation of pathways of a defined dimension, etc. given they are minor in nature in accordance with specified parameters. It is our recommendation that the Township develop a Shoreline Preservation By-law specific to tourist campgrounds to provide greater ability to evaluate potential impacts in proximity to a shoreline. It is anticipated that this type of by-law could overlap with areas regulated by conservation authorities and/or Parks Canada. Such a by-law can also be written so that properties that receive site plan control approval can be exempted for works completed in accordance with approved site plan drawings.

| Pros | Cons |
|--|---|
| Allows for the regulation of specified activities within a specified distance from the high water mark | Requires further consultation and revisions to meet its intended goal |
| Can incorporate administrative monetary penalties for non-compliance | May require additional staff resources to process additional applications |
| Can be modified edited over time to evolve with development | May be perceived as over-regulating development |
| Provides additional regulation for site alteration within the ribbon of life | |

3.6 Site Alteration By-law

A Site Alteration By-law under section 142 of the Municipal Act that regulates activities such as the addition of fill, removal of topsoil, and the alteration of grade on a property. The purpose of this type of by-law is to provide the Township greater ability to manage and regulate changes to drainage, impacts on water quality, and erosion and sedimentation, particularly with respect to filling in gaps that exist in the mandate of other regulatory agencies such as conservation authorities. Minor alteration can still be permitted such as the addition of flower beds, vegetable gardens, etc. Such a by-law can be written so that properties that receive site plan control approval can be exempted for works completed in accordance with approved site plan drawings. It is our recommendation that the Township implement a site alteration by-law that would apply to tourist campgrounds.

| Pros | Cons |
|---|--|
| Only applies to parcels of land of a given size | Requires time for permits to be processed |
| Protects the following: <ul style="list-style-type: none"> / drainage patterns / interference and potential damage to watercourses / water quality natural heritage features | May require additional staffing to process applications |
| Prevents the following: <ul style="list-style-type: none"> / erosion and sedimentation / the use of hazardous or improper fill / interference and potential damage to watercourses | Only regulates grading, topsoil removal, and the addition of fill and does not deal with tree removal that may otherwise be required |
| Can be revised over time to evolve with development | |
| Can be linked to an administrative monetary penalties By-law | |

3.7 Tree By-law

A Tree Cutting (Forest Conservation) By-law is a by-law under section 135 of the Municipal Act which regulates the removal of trees within woodland areas as specified within the by-law. The purpose of this by-law is to ensure the longevity of woodlands within the municipality. The by-law can be crafted to maintain flexibility recognizing the rural character of the Township while also ensuring that an appropriate process and compensation is provided for removal of certain types of trees. A tree cutting by-law is made more effective when approached in tandem with a site alteration by-law. It is our opinion that a tree cutting by-law would be appropriate for the Township to introduce in conjunction with a site alteration by-law, in relation to tourist campgrounds only.

| Pros | Cons |
|---|--|
| Protects the forest coverage of the municipality | Requires time for a permit to be processed |
| Allows the removal of trees around a building or structure | Places the responsibility on the property owner to fill out a permit |
| Works in tandem with the site alteration by-law ensuring trees are permitted to be removed prior to site alteration | Only regulates the removal of trees on a property |
| Protects a natural form of stormwater retention | |
| Can be tied to the administrative monetary penalties By-law | |

3.8 Administrative Monetary Penalties By-law

An Administrative Monetary Penalties By-law would allow the municipality to impose financial penalties to property owners that do not abide by other by-laws passed under the Municipal Act such as the Shoreline Protection, Site Alteration, Tree Cutting By-laws recommended above. Financial penalties are intended to encourage compliance or discourage violations and are significantly more cost effective for the Township to collect than traditional means such as provincial court. Financial penalties can be applied to the tax roll for a property if not paid within a given timeframe as well. It is our recommendation that the Township implement an Administrative Monetary Penalties By-law in conjunction with the other Municipal Act By-laws referenced above.

| Pros | Cons |
|--|---|
| Provides an added level of enforcement for Municipal Act by-laws within the municipality | Requires non-compliance to be reported |
| Ties the financial penalty to the tax roll of a property | Requires legal advice to draft the by-law |
| Provides a matter to address non-compliance without having to go to civil court | |

3.9 Amend Noise By-law

One option for amending the noise by-law is identified in section 2.2.9 of this report, and our recommendation is that the following be implemented:

- a) Update the Noise By-law to target noise emitted by yelling, shouting, and hollering

Rationale: This implementation will capture the noise emitted by people that is not currently captured within the by-law. This phrasing is consistent with other noise by-laws in the province including the city of Kingston.

3.10 Licensing

A Licensing By-law would require that tourist campgrounds apply annually for operating licenses. Such applications would be accompanied by updated site plans and would allow Township staff to undertake inspections at the time of renewal to ensure compliance with municipal by-laws and with submitted site plans. A licensing by-law provides significant ability for the Township to regulate and monitor changes to properties over time and provides a mechanism to ensure that other by-laws are adhered to as well. A licensing by-law requires significant expenditure of staff time for administration and enforcement and that such considerations may significantly impact the effectiveness of a licensing by-law.

This report recommends a number of significant changes to the land use planning regime in the Township through amendments to the OP, zoning by-law, site plan control by-law, noise by-law, and introduction of four new by-laws (shoreline preservation, site alteration, tree cutting, and administrative monetary penalties). These tools collectively are anticipated to address most, if not all, of the issues identified through this study. A licensing by-law provides a mechanism that may assist in the implementation of the other tools. The primary effect of a licensing by-law is that it would facilitate ongoing monitoring of specified business types. Introduction of the other Municipal Act tools discussed previously would grant the Township the ability to physically investigate for compliance should there be cause for the Township to suspect non-compliance but does not inherently establish a mechanism for regular review and monitoring to ensure that site plans are regularly updated and kept up-to-date. We therefore recommend the implementation of a licensing by-law to proceed concurrent with the other recommended Municipal Act tools. Consultation with campground operators will be a crucial aspect to the successful implementation of this by-law.

| Pros | Cons |
|---|--|
| Provides additional opportunity to monitor compliance with regard to tourist campground development | Requires substantial staffing requirement and Township resources |
| Establishes a consistent review and enforcement mechanism and expectation for licensed campgrounds | |
| Incentivises compliance | |

3.11 Community Planning Permit System

A Community Planning Permit System (CPPS) is a Planning Act tool that works similarly to a zoning by-law in that it regulates permitted land uses as well as performance standards such as height, setbacks, density, etc. A CPPS differs from a zoning by-law though, as it includes substantial additional controls that overlap with those

of a site plan control by-law and also allows for minor deviations that would require minor variance approval under a zoning by-law. A CPPS, however, operates instead of, rather than in conjunction with, a zoning by-law and site plan control by-law. The area of a municipality regulated under a CPPS should not also be regulated under zoning and site plan control. As such, a CPPS requires a complete re-think of the OP to be implemented.

| Pros | Cons |
|--|--|
| Shorter approval time from 90 to 45 days | Requires a foundational planning shift and re-think of the new OP which is to be implemented |
| Provides a holistic examination of the application taking into site plan control | Requires significant staff and financial resources to prepare all of the required materials |
| Provides additional flexibility as it takes into site specific constraints which may be captured by a minor variance application | |

4.0 Conclusion

The purpose of this report is to present and make recommendations regarding issues and options regarding land use tools pertaining to tourist campgrounds in the Township of Rideau Lakes. Eleven options are presented, some of which include additional sub-options. Of the eleven overarching options, nine are recommended for action. The options recommended in this report can be separated into Planning Act recommendations and Municipal Act recommendations. The Planning Act recommendations include proceeding with amendments to the official plan, the zoning by-law, and the site plan control by-law. The Municipal Act recommendations will provide additional enforcement measures and clarity regarding permitted activities with the added benefit of applying to existing campgrounds. The shoreline preservation by-law will regulate how develop occurs along the shoreline, the site alteration will regulate how proposed site alteration on a tourist campground will occur, a tree by-law will work in tandem with both by-laws to ensure certain trees are protected from being destroyed, and the administrative monetary penalties by-law will enforce these by-laws with financial penalties for non-compliance.

This Issues and Options Report is intended to provide recommendations to council as to which options to pursue as part of the overall land use study. This report introduces the project, its history, relevant agencies associated with the tourist campground land use, and the current planning policy which governs this form of development. The second part provides the issues as we heard them and the proposed options. This report finishes by providing recommendations to council derived from the proposed options which represent what we believe to be options that are in the public interest.

APPENDIX A

RESPONSES TO WRITTEN COMMENTS

| Comment | Response |
|---|---|
| Common Themes regardless of topic are: | |
| 1) There must be comprehensive baseline data available for campgrounds in TRL regarding existing circumstances; | Broad technical baseline data and its associated analysis, such as hydrogeological data, traffic, etc. is outside the scope of this study. As part of the development approvals process, supporting studies would be required to assess existing conditions against proposed development to evaluate the change that would result from development. |
| 2) There are too many " may " and not enough " shall "; | Our recommended OP amendments would result in greater clarity regarding supporting study requirements. |
| 3) Require applicable studies for all campground development; | Recommended OP amendments would specify more required studies. |
| 4) Enforcement and taking of securities are the best way to ensure compliance; | Recommended site plan control amendments would add ability to collect securities. |
| 5) Follow-up site control plan inspections need to occur earlier; | The Township has a program in place to follow up with site plans two years after their approval. |
| 6) Imposing conditions of approval where things are non-conforming can be better than denying a project. If you create an incentive to do shoreline planting then you are more likely to get it; | Shoreline planting is a requirement as part of the Township's current practice. |
| 7) Many of the policies can apply to any major development project, not just campgrounds but multi-unit proposals or commercial ventures - anywhere site plan approval is required. | Our recommendations apply only to tourist campgrounds in accordance with the mandate provided by Council. |
| Comments and Suggestions | |
| Background | |
| The cover page should be amended to remove the impression that it is only the main Rideau System that is part of the study. At a minimum, Otter Lake and Bass Lake could be highlighted as they have campgrounds. | The image on the cover page includes the entire Township. |
| This section indicates that Fotenn and staff did not feel an ICBL was necessary whereas Council did. Reasons for this should be included in the report. | The reasons for Fotenn not supporting the ICBL are detailed in the report provided to Township council prior to their approval of the ICBL. |
| Regulatory Authorities | |
| The explanation of the roles of various agencies was quite useful but should be more definitive in explaining how the TRL can be more proactive in requesting inputs or making inputs a condition of approval. For example, all site control plans need an Environmental Impact Study (EIS) at a minimum. This, and the need for enforcement, will be a common theme in these comments. | The Township currently requests the input from the agencies that have commenting power or regulatory authority. |
| Planning Process | |

| Comment | Response |
|---|---|
| The TRL Official Plan (OP) must be amended to better define uses which are permitted in campgrounds such as tents/RVs /seasonal cabins or camper trailers. In addition, this is the place to make all background studies that could be recommended as mandatory. | The OP is a higher order policy tool. Our recommended OP amendments provides greater clarity regarding required studies for tourist campgrounds. Our recommended amendments to the zoning by-law provide detailed direction regarding trailers, etc.. |
| Before the Phase 3 - Land Use Study, Council needs to know what the existing situation with all campgrounds in TRL is in relation to the Table that outlines the Zoning By-Law provisions and requirements for Campgrounds. | This report includes the current zoning by-law and site-specific zones regarding tourist campgrounds in the Township. |
| This section states that the application of site plan approval authority by TRL is not allowed under the Planning Act for two or less new sites. TRL should not only be able to tell us how many times this has occurred but should apply to the province to change the Act. | Building permit records can be requested from the Township. Any individual or council can request changes to provincial legislation by contacting their MPP, the relevant minister, or the Ministry of Municipal Affairs. |
| Issues and Options | |
| Do Nothing | |
| Since the Consultants felt an Interim Control By-Law (ICB) was not necessary, this may influence the Township into thinking the Official Plan is good enough and hopefully will not consider this as an option. | We do not recommend the “do nothing” approach. |
| Review and Amend the Official Plan | |
| Water Quality | |
| 1) There is a need to emphasize enforcement and make Shoreline Impact Studies / EIS mandatory prior to issuance of any approval. The conditions of approval need to be enforced within one year. | The recommendations herein collectively will have significant impact on shoreline protection and provide greater ability to the Township to regulate activities and ensure that approved site plans are implemented as required. |
| 2) The requirement for studies should be mandatory for large developments; “large” must be defined. | Our recommended OP amendments would result in greater clarity regarding supporting study requirements. |
| 3) This is all about specifying thresholds or triggers for when a Lake Impact Assessment or Lake Capacity Study would be required. Add reference to Lake Impact Studies and Lake Capacity Assessments to the Tourist Commercial Policies under section 3.8.5.2. | Our recommended OP amendments would result in greater clarity regarding supporting study requirements. |
| 4) Water Setback and coverage on small lots needs to be evaluated if variances are sought. Should be considered along with proposed mitigation. Lack of conformity should not mean denial if circumstances make conformity difficult. For example, many lots on our Bass Lake private roads are very shallow so some creativity is needed. All about enforcement and mitigation. It should also be noted that recent OMB decisions say that non-compliance and non-conformity could be interchangeable terms. | Recommended OP amendments would allow the Township to apply more nuanced approaches to establishing shoreline setbacks. |
| Shoreline | |
| 1) TRL and the Consultant feel the existing OP is good enough to protect shorelines although development approvals may require enhancements. | Please refer to the recommendations in this report. |

| Comment | Response |
|--|---|
| 2) Create policy which enforces an improvement to the shoreline for any new development or development to existing non-conforming sites to ensure the shoreline remains in a more natural state. | Please refer to the proposed OP amendments and Municipal Act tools discussed in our recommendations. |
| Septic Systems | |
| 1) Septic System Inspections has been a very successful program in our Township and Council is applauded for instituting this program. | Noted. |
| Lake Impact | |
| 1) Lake Impact studies should be mandatory for all campground and multi-unit development applications and the study should include evaluation of existing situation. | Our recommended OP amendments would result in greater clarity regarding supporting study requirements. |
| 2) The OP should cover all applications. In addition, a better method of dealing with nonconformity is to ensure site plan conditions mitigate lake Impacts. | Legal non-conformity is protected in the Planning Act. Our recommended Municipal Act tools could be framed in such a way as to limit shoreline-impacting activities even for legal non-conforming conditions. |
| 3) No application should be considered without all the mandatory studies that the new OP requires. | The Township currently has the ability to deem an application "incomplete" if it is not accompanied by all of the supporting studies and plans identified as requirements through the pre-consultation process. |
| Noise | |
| 1) The word "lighting" should be changed to "noise" in third last line. | Addressed. |
| Density | |
| 1) Need baselines of the existing situation are required so any new proposals can be evaluated, with appropriate background studies, against that baseline. Conditions of approval can then be generated and enforced. Should apply to all development applications. | Broad technical baseline data and its associated analysis, such as hydrogeological data, traffic, etc. is outside the scope of this study. As part of the development approvals process, supporting studies would be required to assess existing conditions against proposed development to evaluate the change that would result from development. |
| 2) Add mitigation techniques for noise, light, boat traffic, screening and so on. | Please refer to the recommendations in this report. |
| Tree Cover | |
| 1) Encourage existing developments to seek guidance from RVCA or Watersheds Canada to improve shorelines. | Conservation Authorities provide comments on development applications adjacent to waterbodies and have regulatory authority adjacent to shorelines. |
| Habitat | |
| 1) This section is very good except for Recommendation #2. Do not see a need to increase wetland buffers. | No change to wetland buffers is recommended. |
| Boat Traffic | |
| 1) Require a mandatory Boat Capacity study for campgrounds and multi-unit proposals/ applications. | Our recommended OP amendments would result in greater clarity regarding supporting study requirements. |
| Clarity Process | |
| 1) Set specific procedures for enforcement, inspection and security deposits. | Recommended site plan control by-law amendments would allow for collecting securities. The Township currently has an inspection program in place. |
| Lighting | |
| 1) Lighting -See Noise section above – same study, mitigation requirements. | Our recommended OP amendments would result in greater clarity regarding supporting study requirements. |

| Comment | Response |
|---|---|
| Wetlands | |
| 1) An EIS should be mandatory for any multi-unit or campground development. | Our recommended OP amendments would result in greater clarity regarding supporting study requirements. |
| 2) Not in favour of increasing buffers to local wetlands. Conditions of Approval to get what is needed (shoreline planting) is a more powerful tool. | No change to wetland buffers is recommended. Please refer to our recommended Municipal Act tools. |
| Environment | |
| 1) Create policy requiring EIS's be peer-reviewed by Conservation Authorities and the Township. | Our recommended OP amendments would result in greater clarity regarding supporting study requirements and peer review. |
| Municipal Services | |
| 1) These are general issues presented which suggest Campgrounds do not pay their fair share. | Taxation is outside the scope of this land use study. |
| 2) While it is agreed that MPAC sets the values there are other ways to get Campgrounds to pay their fair share including special area charges. | Taxation is outside the scope of this land use study. |
| 3) This further suggests that TRL should undertake a study of the impacts (economic vs adverse) and regulate accordingly. | Although not a recommendation of our study, we agree that further examination of the economic considerations is appropriate. |
| Wildlife | |
| 1) The eight recommendations are fine although expanding a buffer on locally significant wetlands could adversely affect existing properties. | No change to existing wetland buffers is recommended. |
| 2) An EIS can identify issues, recommend mitigation and quite possibly improve wildlife Habitat. | Noted. |
| Drinking Water | |
| 1) Specify a requirement for Hydrogeological Assessment for Tourist Commercial developments, both new proposals and proposals for expansions. | Our recommended OP amendments would result in greater clarity regarding supporting study requirements. |
| 2) Introduce a peer review policy to provide greater clarity to staff and applicants that peer review of hydrogeological assessments is anticipated where such studies are required. | Our recommended OP amendments would result in greater clarity regarding supporting study requirements and peer review. |
| Land Use Study | |
| 1) The Land Use Study must recognize that non conformity/compliance is common around Bass Lake and that mitigation is sometimes better than a "do nothing approach". Any proposal can be conditioned to improve shorelines. | Please refer to the Municipal Act tools recommended in this report. |
| Non-Compliance | |
| 1) We feel the recommendation/options are quite strong here. | Noted. |
| Residential Transition/Trailer Types | |
| 1) We support the recommended enhancements in the Zoning by-law. This is where TRL can be very specific. | Noted. |
| 2) Create policy addressing the Z241 trailer within the tourist campground use under section 3.8.5.2; | Please see our recommended amendments to the zoning by-law. It is our opinion that the OP is not the appropriate place for dealing with specific trailer types. |
| 3) Residential Transition/Trailer Types- Agree with recommendations as clear definition of all seasonal dwelling types is required. | Please refer to our recommended zoning by-law amendments. |
| Review and Amend the Zoning By-law | |

| Comment | Response |
|--|--|
| 1) Introduce a density metric for the tourist campground use regarding number of sites per hectare; number of sites per a given length of frontage; number of sites per a given length of shoreline; number of sites per developable area on the property (developable area to be defined); minimum area requirement for campsites; minimum separation requirement between campsites; limit to the number of campgrounds or campsites on a waterbody or within a geographic area. These options are all highly prescriptive and generally better suited to a zoning by-law than an OP. | Please refer to our recommended zoning by-law amendments. |
| 2) Introduce a policy requiring that Tourist Commercial uses, specifically, demonstrate conformity with sections 2.2.5 to reduce light spillover and that this is to be implemented through site plan control. | Please refer to our recommended OP amendments. |
| Review and Amend Site Plan Control By-law | |
| 1) List the studies required for any multi-unit proposal. Included would be: noise, traffic, shoreline, lighting, tree, hydrogeological etc. They could be waived if there is a good reason to do so. | Our recommended OP amendments would result in greater clarity regarding supporting study requirements. |
| 2) Site Plan Applications should include all the various studies before they are deemed complete and processed. Enforcement policies need to be specified. | Our recommended OP amendments would result in greater clarity regarding supporting study requirements. |
| Implement Shoreline Preservation By-law | |
| 1) Agree with a Shoreline Preservation By-law Option 2.2.5 to: a) regulate lands within a specified distance of the high-water mark; b) limit site alteration; c) allow for inspection; d) restrict tree removal; d) provide reasonable exemptions; and e) specify penalties for non-compliance. | Noted. |
| Implement a Site Alteration By-law | |
| 1) Agree with a Site-Alteration By-Law Option 2.2.6 to: a) regulate properties over a certain area with respect to the placing and dumping of fill, removal of topsoil and altering grade; b) allow minor exceptions; c) specify penalties for non compliance, and d) utilize section 2.20.4 of the Official Plan to require an EIS. | Noted. |
| Implement a Tree Protection (Forest Conservation By-law) | |
| 1) Where trees are lost because of a project, a condition of approval could be replacements. | This can be incorporated into a Tree Cutting By-law. |
| 2) TRL should promote reforestation plans or advertise the RVCA planting program. | Noted. |
| Administrative Penalties By-law | |
| 1) Agree that the recommended Administrative Penalties By-law (Option 2.2.8) assists in such enforcement, but it is not clear to what extent such a ticketing practice would address issues of non-compliance, particularly in the matter of more serious offences such as failure to apply for appropriate building and development permits. | The intent of administrative monetary penalties is to discourage non-compliance. The degree to which such a tool is effective can be evaluated periodically. |
| Strengthen Current Noise By-law | |

| Comment | Response |
|---|---|
| 1) Agree with amendment to: <i>Noise By-law</i> : Option 2.2.9 to target noise emitted by individuals or activities outside specified times; specify penalties for non-compliance; | Please refer to our recommended Municipal Act tools. |
| 2) The noise by-law (Option 2.2.9) as it stands needs revision anyway since it is incomplete and virtually unenforceable; it provides no scientific metric by which to ascertain the noise level beyond subjective opinion. | Please refer to our recommended Municipal Act tools. |
| Licensing | |
| 1) Agree with recommendation to create – <i>Tourist Campground License By-law</i> Option 2.2.10 to require tourist campgrounds to apply for a yearly license wherein business owners provide updated site plans and to allow for inspections for compliance with by-laws. | Please refer to our recommended Municipal Act tools. A licensing by-law is recommended. |
| As for amending and creating by-laws, the inclusion of rights of inspection for campgrounds allows for oversight, but how would this be achieved to ensure enforcement? Although as the Fotenn report states “[t]he adopted OP provides sufficient policy framework for the Township relative to non compliant development”, no formal processes, or procedures for investigating and enforcing infringements are in place in the TRL for dealing with infringements of regulations. Currently, excessive time required, insufficient resources, and high costs are cited as reasons for the TRL’s challenges to address issues of non-compliance brought to their attention by the community | Please refer to our recommended Municipal Act tools. |
| There seems to have been significant creep in the scope of this issue which in July 2021 was a background report that identified a few campgrounds in the area were the subject of nuisance complaints. There was lack of transparency around the issue from the beginning with no clear identification of the number of complaints, who defined them as “many” (in relation to what?) and whether the complaints were valid or vexatious | Noted. |
| We note that this draft report, which comprises part of phase 2, has been provided with the note that dialogue with stakeholders in phase 1 has not been concluded. We question the timeline adjustment to the report to “provide greater opportunity to consult with the public, including seasonal residents as they return in the spring”... Does this mean that consultation with campers with seasonal contracts in campgrounds will occur? They are taxpayers with the option of voting in municipal elections or is Council going to again eliminate them from the consultation process. TRL Council seems to have decided on a plan of action and is pursuing it, regardless of information or best practices in these cases. | Public consultation for this study will be ongoing. Although this report is now issued as a final document, there remain opportunities for continuing consultation with the Township and the public through the conclusion of Phase 2 and into Phase 3 of this study. |

| Comment | Response |
|--|--|
| <p>We note that Eastern Ontario is home to many rural based campgrounds in several townships and counties. It would stand to reason that consultation with other townships with respect to their policies and regulations with respect to campgrounds would be beneficial and informative. The United Counties of Leeds and Grenville includes a number of townships and one would think that county leadership would ensure consistency between township official plans and subsequent zoning by-laws to support consistency for taxpayers and to support the public interest.</p> | <p>Zoning by-laws from 20 municipalities in Ontario were examined, including several from Eastern Ontario.</p> |
| <p>We do appreciate the clarity and comprehensive nature of the report prepared by Fotenn and the attempt to remain unbiased in providing information. It is acknowledged that this process has created tension between campground operators and the TRL since the overwhelming perception is the Council is concerned with appeasing cottage owners and has little to no interest in supporting private tourism operators. The failure of TRL to consider the economic impact of changes in policy and regulation as it relates to tourist campgrounds is irresponsible government. While evaluating/assessing economic impact may be outside of this land use study it is crucial to decision making to avoid a much larger negative impact on township businesses that benefit economically from campgrounds.</p> | <p>Noted.</p> |
| <p>Implementation of proposed by-law changes would benefit TRL financially and the perception is that Council is using this issue to deceptively reach into the pockets of campers and campground owners. We question the response that would be received from landowners if the proposed by-laws were uniformly applied to all landowners and not just campgrounds. We suspect it would be overwhelmingly negative</p> | <p>Noted.</p> |
| <p>While the draft report is comprehensive, we note the absence of comment in two areas: climate change and communication. A number of zoning by-law recommendations speak to issues that could very well be caused by climate change (eg. Water quality). It is a well known fact that climate change (warming water) has created an increase in algal blooms. No number of additional by-laws are going to effectively correct the wrath of mother nature.</p> | <p>Existing and future background conditions, such as climate change, are expected to be considered through site-specific technical studies as part of the development application process for new or expanding campgrounds.</p> |

| Comment | Response |
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| <p>As well, there are no recommendations that address enhancing or improving communication to address NIMBY (not in my backyard) complaints or issues. Again while by-laws have their place to support official plan policy they are not a replacement for effective communication from Council to taxpayers. There has been a lack of attempt to educate or inform the parties that are in conflict and rather an approach to “tar everyone with the same brush” authoritarian approach. This approach is usually ineffective and does nothing to resolve the underlying issues. It usually increases the conflict and causes polarization between the parties.</p> | <p>The Planning Act establishes mandatory public consultation requirements. Individual property owners, applicants and councils may choose to implement additional communication programs.</p> |
| <p>As noted in the options document, 2.2.1 Council has the option of “do nothing”. I would suggest this option may be the most challenging for TRL to adopt but it is the correct one to undertake particularly if it is supported by processes to engage parties in conflict and with a robust communication strategy and effective Council leadership. Council needs to have confidence in their decision making instead of being swayed by the loud minority, again ensuring the global public interest is met.</p> | <p>This option is not recommended by our report.</p> |
| <p>On page 39 and 40 it is stated that: “The adopted OP policies align with the prevailing intent of the concerns and issues expressed to the project team. However, there may be opportunities to strengthen the OP policies slightly to provided municipal staff with greater authority during the review of development applications.” It offers 9 amendments (none of which could be described as slight but are rather extensive). We take issue with amendment #9 “establish seasonal dates for Tourist Commercial or tourist campground use”. This amendment is also noted on page 50 “create policy to set seasonal dates for the Tourist Commercial use under section 3.8.5.2”. It is ludicrous to propose that township council will set the dates that a campground may open and close. This amendment has no relationship to the goal to support staff during the review of development applications. It is clearly an attempt to control and override the private owner/operator of a campground. If TRL so desperately wants to control the operating dates of a private campground, a more appropriate amendment would be that a campground may operate for a maximum of 7 months of the year.</p> | <p>Please refer to our recommended zoning by-law amendments, which include specificity regarding seasonal operations. We do not recommend implementing this option through the OP.</p> |

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| <p>Page 51, Section 2.2.3 Review and amend the zoning by-law offers numerous additional restrictions. Amendment “i” is for a 30 metre (98 feet) strip of unaltered naturalized land abutting the shoreland with the exception of a modest shoreline access path. It needs to be understood that campgrounds are expected to have beaches to promote a play area for children to play and swim. Additionally, a 100 strip of unaltered naturalized land is a haven for ticks, particularly the black legged tick which carries Lyme disease. In our area, it is estimated that 50% of the ticks carry Lyme bacteria. A more appropriate amendment would be that x percent of the overall length of the campground waterfront property will be permitted to be a developed area (childrens play area, swimming/beach/picnic).</p> | <p>Please refer to our recommended zoning by-law amendments and associated discussion of amendments that we are not recommending.</p> |
| <p>Section 2.2.4 of page 52 Review and amend the site plan control by-law has two amendments that are unclear, “a” and “d”.</p> <p>Amendment ‘a’ states: introduce the ability and requirement for the township to collect securities for on and off-site works through the site plan control process. What is the “securities” that are to be collected? This seems to be a form of hidden taxation</p> <p>Amendment “d” states: trailers in a calendar year requires an application to amend the site plan control agreement or enter into a new agreement if one does not exist. What does this mean?</p> | <p>Please refer to our revised site plan control amendments.</p> <p>Securities are financial commitments made to the Township during the site plan process, based on engineering cost estimates, that pertain to the cost of works associated with the approved site plan. These securities incentivize completion of required works by the applicant and can be used by the Township to complete works if an applicant decides not to, while limiting costs to the taxpayer.</p> <p>Please refer to our revised site plan control amendments for clarity.</p> |
| <p>Section 2.2.5 is related to earlier comment on the naturalized land recommendation. We are supportive of shoreline preservation provided it can be balanced with the expected amenities that are consistent with those found in a campground.</p> | <p>Noted.</p> |
| <p>Section 2.2.8 Administrative Penalties By-Law comments that the primary benefit of implementing this by-law is that it allows the municipality to impose financial penalties rather than taking matters to civil court. It should be noted that any fine system must include an appeal process which can culminate in civil court litigation. The township would be increasing their workload with a fine system and again, if this is not consistent with by-laws in other townships it could be perceived as a hidden taxation process.</p> | <p>Noted. An AMP By-law incentivizes compliance with municipal by-laws. There would be an appeal process which can lead to civil court litigation.</p> |
| <p>Section 2.2.10 Licensing proposes that campgrounds will apply for a yearly license. This license is to provide an updated annual site plan and to give the township permission to undertake inspections for compliance with municipal by-laws. We are very strongly opposed to this recommendation and quite honestly appalled at the suggested abuse of power.</p> | <p>Please refer to our recommended Municipal Act tools. A licensing by-law is recommended.</p> |

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| <p>The concept of a license has absolutely no relevance to the land use study which is related to the establishment of new or expanding campgrounds. If one has gone through the site plan control process why is there an expectation for an annual license. This recommendation far exceeds the authorities set out in the Official Plan and by-laws and is an example of targeting private campgrounds to appease political pressure. No other private business is required to apply for an annual license in order to open for business unless they have other overarching authority (liquor license etc). Licensing is unrelated to the issues raised in the draft report and as a recommendation satisfies none.</p> | <p>Please refer to our recommended Municipal Act tools. A licensing by-law is recommended.</p> |
| <p>A more appropriate recommendation is to include a requirement that campgrounds will advise TRL within 90 days of any changes to their site plan agreement.</p> | <p>Prior to amending site plan control agreements, applicants must pre-consult with the Township to clarify application requirements.</p> |
| <p>Essentially, Council will be threatening a campground that they cannot open unless the campground gives written permission to TRL to inspect annually for compliance with by-laws when there has been no reasonable grounds to support an infraction. Campgrounds already have more than sufficient federal, provincial and county and township oversight without TRL looking to obtain additional fees and control for a license. It is suggested that TRL is abusing their authority, and overreaching the Planning Act which speaks adequately to the site plan control agreement. They would be implementing a punitive measure inconsistent with county and provincial plans and direction</p> | <p>Please refer to our recommended Municipal Act tools. A licensing by-law is recommended.</p> |
| <p>There needs to be a reminder to TRL that this ICBL was related to new or expanding campgrounds. We agree that measures need to be in place to ensure campgrounds meet environmental restrictions and that they are located where they can operate effectively in harmony with neighbouring landowners. Where existing campgrounds and landowners are in conflict, additional policies, bylaws and regulations will do little if anything to resolve the issue. TRL needs to step up to the plate and show leadership, engaging those parties through an effective communication strategy to resolve the conflict. After all, those campgrounds were originally approved by township officials to operate in those locations. We learn over time and need to reach resolution rather than creating a negative relationship between TRL and all campgrounds in the township.</p> | <p>noted.</p> |
| <p>Our three suggestions are:</p> | |

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| <p>1) Clearly identify who within the Township is responsible for compliance to the new rules and ensure that they have adequate time and/or staff to address that objective and build that into their yearly documented objectives. Those objectives include interaction with all the appropriate provincial, federal and conservation authorities documenting plans/requirements as well as follow up to ensure that commitments are achieved.</p> <p>2) We applaud your recommendation to require yearly license renewals for all campgrounds. Included in that license renewal should be a compliance document clearly outlining all the campground requirements. That document requires signature by the campground owner validating that they are compliant. That compliance certification should be required every year prior to opening the campground. Each compliance document lasts only one year.</p> <p>3) Most of the focus has been on campgrounds located along waterways. We want to ensure that these requirements meet the needs of landlocked campgrounds as well.</p> | <p>Township staff will be responsible for reviewing applications that relate to new and expanding campgrounds.</p> <p>Please refer to our recommended Municipal Act tools. A licensing by-law is recommended.</p> <p>The recommendations of this report will apply to all tourist campgrounds in the Township.</p> |
| <p>We believe that it is very important to clearly identify the impact in terms of tourist dollars associated with campgrounds. Some provincial studies have provided a view of \$3,000+ per month (or some other time period). We do not believe that is an appropriate reflection of the impact of Tourist Campgrounds. Tourist Campgrounds are only open 6 months per year, not 12 months per year like other trailer parks. Summerhill clearly identified that they are focused on executive level clientele which implies that most of these trailers will be used on weekends and perhaps 2 weeks of vacation per year. Those of use who had weekend cottages within driving range recognize that you buy food, alcohol, and other staples at home and bring them with you to the cottage so that you can maximize time spent outdoors. There needs to be a thorough review of that provincial estimate to ensure that it applies to Tourist Campgrounds where most of the inhabitants are only there on weekends.</p> | <p>Economic impact is outside the scope of this report but we agree that further consideration is warranted.</p> |

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| <p>We also believe that current Park Model trailers (in reality cottages) are replacing significantly smaller trailers. A good example is the set of trailers next to Bob Bolton's farm. Larger Park Model Trailers (cottages) are closer to the fence than the previous trailers since they cannot intrude on a roadway that is in place. While they remain the same distance from the roadway, their additional length puts them closer to the fence. One is about 12 feet from the fence while an older, smaller trailer is 21 feet from the fence. Given that physical reality, we do not believe that grandfathering of sites should be allowed when Park Model trailers(cottages) replace current trailers, especially when the old trailers are only about 20 feet from the fence – substantially less than a 30 M setback!</p> | <p>Legal non-conformity is protected in the Planning Act. Our recommended changes to the zoning by-law would have the effect of extending legal non-conforming status to park model trailers that legally exist at the time that an amending zoning by-law is approved, however new park model trailers would be subject to the new requirements such as larger sites.</p> |
| <p>There have been ongoing debates about when building permits are required – for decks, for mounting Park Model Trailers are two examples. The bylaws or OP should clearly state when building permits are required in a Tourist Campground to eliminate any further debate or confusion.</p> | <p>The Ontario Building Code specifies when building permits are required.</p> |
| <p>We are not experts in Thresholds for studies, so we would like to propose simplifying things for everyone. Any time there is a commercial campground operation being initially planned or planned for expansion (both require site plans, so the site plan could be the trigger), the following are required:</p> | <p>Answered below.</p> |
| <p>1) Lake Impact Study Thresholds</p> | <p>Our recommended OP amendments would result in greater clarity regarding supporting study requirements.</p> |
| <p>2) Boat Capacity Study</p> | <p>Our recommended OP amendments would result in greater clarity regarding supporting study requirements.</p> |
| <p>3) Traffic Impact Assessment</p> | <p>Our recommended OP amendments would result in greater clarity regarding supporting study requirements.</p> |
| <p>4) Hydrogeological Study</p> | <p>Our recommended OP amendments would result in greater clarity regarding supporting study requirements.</p> |
| <p>5) Air Quality Study</p> | <p>Our recommended OP amendments would result in greater clarity regarding supporting study requirements.</p> |
| <p>6) Environmental Impact Study</p> | <p>Our recommended OP amendments would result in greater clarity regarding supporting study requirements.</p> |

| Comment | Response |
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| <p>The Environmental assessment must be done by on the ground research for review of wetlands, etc. during the period when animals and birds are present – perhaps late May through early October (not 1 hour in November as was completed for one campground application). That will be followed by a full Environmental Impact Statement. The work should be completed by a qualified environmental consulting firm from an approved list provided by the township</p> | <p>The peer review process ensures that studies are conducted in accordance with industry standards and best practices.</p> |
| <p>We had a long discussion about the review of these documents by independent professionals. If we take Waterways as an example, Summerhill had advanced discussions on requirements with Township Council, RVCA and at least one Ontario Government department in April 2020. That was a positive approach and allowed Summerhill to present their views and obtain tentative agreement from those agencies who were all part of the negotiations and understood all the concessions made by all parties. Having any one of those groups act as an independent reviewer on any subsequent studies is like “the fox guarding the henhouse”. The Township should provide a list of acceptable companies who can act as an independent reviewer for each type of study. The cost of that independent review should be covered by the campground.</p> | <p>Individual campgrounds and development applications are outside the scope of this study. However, we note the following:</p> <ul style="list-style-type: none"> / It is common practice, even often required, for applicants to pre-consult with agencies prior to a development application to determine the requirements of those respective review agencies. / The Township can establish a roster of approved third party peer reviewers however both conservation authorities and provincial agencies often offer to provide peer review services. |
| <p>In the case of any development on Big Rideau Lake, the requirements of the Lake Impact study should be adjusted to reflect that Big Rideau Lake is the last remaining “Trout Lake” in the area. Loss of that designation would have a very serious negative impact on tourism in Rideau Lakes Township.</p> | <p>Our recommended OP amendments would result in greater clarity regarding supporting study requirements.</p> |
| <p>Density Limits</p> | |
| <p>The recommendations need to specifically limit the size of a campground to an acreage or number of campsites. We would recommend a maximum size of 150 campsites in a campground or 80 usable acres.</p> | <p>Please refer to our recommended zoning by-law amendments.</p> |
| <p>The recommendations need to specifically limit the distance between campgrounds. We would recommend a minimum distance of 3 Km (as the crow flies) between campgrounds. In the Hudson Bay area, we have 4 campgrounds within 1 Km (as the crow flies).</p> | <p>Please refer to our recommended zoning by-law amendments.</p> |

| Comment | Response | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| <p>We would recommend a density of 2 campsites per usable acre (5 per hectare) which is twice the density of cottages. In parallel with that, the current bylaw restrictions need to remain in place as outlined in the FoTenn report:</p> <p>The requirements for tourist campgrounds in the current zoning by-law are presented in the table below:</p> <table><tr><th>Zoning</th><th>By-law</th><th>Provision</th><th>Requirement</th><th>Tourist Campground (Section 6.3)</th></tr><tr><td>Lot Area (minimum)</td><td>–</td><td>Tourist Campground</td><td>2 hectares</td><td></td></tr><tr><td>Lot Frontage (minimum)</td><td></td><td></td><td>60 metres</td><td></td></tr><tr><td>Front Yard (minimum)</td><td></td><td></td><td>10 metres</td><td></td></tr><tr><td>Exterior Side Yard (minimum)</td><td></td><td></td><td>10 metres</td><td></td></tr><tr><td>Interior Yard (minimum)</td><td></td><td></td><td>10 metres</td><td></td></tr><tr><td>Rear Yard (minimum)</td><td></td><td></td><td>15 metres</td><td></td></tr><tr><td>Accessory Dwelling Unit Area (minimum)</td><td></td><td></td><td>60 m2</td><td></td></tr><tr><td>Tourist Campground Site Area (minimum)</td><td></td><td></td><td>60 m2</td><td></td></tr><tr><td>Open Deck (maximum)</td><td></td><td></td><td>30 m2</td><td></td></tr><tr><td>Accessory Structures (maximum)</td><td></td><td></td><td>1</td><td></td></tr><tr><td>Accessory Structure Size (maximum)</td><td></td><td></td><td>10 m2</td><td></td></tr><tr><td>Lot Coverage (maximum)</td><td></td><td></td><td>30 %</td><td></td></tr><tr><td>Accessory Dwelling or Dwelling Units per lot (maximum)</td><td></td><td></td><td>1</td><td></td></tr></table> | Zoning | By-law | Provision | Requirement | Tourist Campground (Section 6.3) | Lot Area (minimum) | – | Tourist Campground | 2 hectares | | Lot Frontage (minimum) | | | 60 metres | | Front Yard (minimum) | | | 10 metres | | Exterior Side Yard (minimum) | | | 10 metres | | Interior Yard (minimum) | | | 10 metres | | Rear Yard (minimum) | | | 15 metres | | Accessory Dwelling Unit Area (minimum) | | | 60 m2 | | Tourist Campground Site Area (minimum) | | | 60 m2 | | Open Deck (maximum) | | | 30 m2 | | Accessory Structures (maximum) | | | 1 | | Accessory Structure Size (maximum) | | | 10 m2 | | Lot Coverage (maximum) | | | 30 % | | Accessory Dwelling or Dwelling Units per lot (maximum) | | | 1 | | <p>please see our recommended zoning by-law amendments.</p> |
| Zoning | By-law | Provision | Requirement | Tourist Campground (Section 6.3) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lot Area (minimum) | – | Tourist Campground | 2 hectares | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lot Frontage (minimum) | | | 60 metres | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Front Yard (minimum) | | | 10 metres | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Exterior Side Yard (minimum) | | | 10 metres | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Interior Yard (minimum) | | | 10 metres | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rear Yard (minimum) | | | 15 metres | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Accessory Dwelling Unit Area (minimum) | | | 60 m2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Tourist Campground Site Area (minimum) | | | 60 m2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Open Deck (maximum) | | | 30 m2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Accessory Structures (maximum) | | | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Accessory Structure Size (maximum) | | | 10 m2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lot Coverage (maximum) | | | 30 % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Accessory Dwelling or Dwelling Units per lot (maximum) | | | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>General Provisions (Section 3)</p> <p>Parking Requirement – Mobile Home Park or Campground 1 space per site as defined in clause 3.15.3 of Zoning Bylaw No. 2005-6</p> <p>(Clause reads as follows 3. Parking Space Size and Access Each parking space shall have minimum dimensions of 2.75m by 6m, except that a parking space for the physically-disabled shall have minimum dimensions of 3.7m by 6m. A parking space shall have unobstructed access, except where tandem parking is specifically permitted by this By-law.)</p> <p>As a reminder, there is only one campground in the township larger than 21 acres that has a density of greater than 2 campsites/acre (note – not usable acre). The average across Rideau Lakes Township is 1.4 campsites/acre</p> | <p>Please refer to our recommended zoning by-law amendments.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Once a campground reaches the limit of 2 campsites per usable acre, the addition of 2 campsites per year is no longer permitted.</p> | <p>Once the maximum achievable density is achieved, no additional campsites would be permitted without an appropriate process (e.g. minor variance).</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Usable acre is defined to exclude setbacks, locally or provincially significant wetlands, campground buildings such as maintenance buildings, sewage facilities and electrical facilities.</p> | <p>Please refer to our recommended zoning by-law amendments.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| <p>As noted in the report, there needs to be a clear definition of a Park Model trailer (as defined in provincial or federal regulations) since those trailers are changing in capabilities on a regular basis. Current view is that Park Model trailers are 40' long and range in width from 8'8" to 11'8". Additional add on units are not allowed as currently outlined on the Summerhill Waterways web site. We do not recommend this, but if Council wants to consider add on units, the combined unit should be counted as 2 campsites. The latest ultra models of trailers include decks atop the trailers. The Park Model Trailer should be allowed one deck – whether it be alongside the trailer or on the roof of the trailer, but not both OR rooftop decks should not be allowed (preferred option).</p> | <p>Please refer to our recommended zoning by-law amendments.</p> |
| <p>The bylaws enacted need to reflect today's reality. The term "trailer" has been used for 50+ years and today's "trailers" are nothing like "trailers" of even 20 years ago. The current business model is to install pre-manufactured structures on a site and call them "trailers" hoping that the bylaws aren't changed to reflect the new reality – so far, that business model has been successful. Park Model trailers, in fact, are permanent structures with no intention of moving off the footings that they are set on. Even Summerhill acknowledges that they won't be moved for 20-30 years. The bylaws need to acknowledge this new reality about what is happening in campgrounds today. The new bylaws need to adapt to that new reality to control and manage unbridled growth. Let's all agree that these trailers have all the amenities of a cottage, are the size of a small cottage, and in reality, they are a cottage. If it looks like a duck, walks like a duck, quacks like a duck, it's a duck!</p> | <p>Please refer to our recommended zoning by-law amendments.</p> |
| Shoreline | |
| <p>On page 44 of the report, it notes "Create policy which <u>enforces an improvement to the shoreline for any new development or development to existing non-conforming sites</u> to ensure the shoreline remains in a more natural state"</p> <p>How is the underlined part defined at a granular level?</p> | <p>Please note that certain changes to the options are reflected in this report, including this option. Please refer to the revised Options section.</p> |
| <p>With respect to the shoreline preservation by-law, we agree with the proposed measures and ask you add some specifics from the 1994 OP:</p> | |
| <p>1) Required setbacks/buffer zones as outlined in the 1994 Official Plan - buffer planting of 100' (30 m) and 6' (2 m) in height between tent and trailer park and adjacent residential areas</p> | <p>It is our opinion that the zoning by-law is not able to provide specific parameters regarding vegetation height, though this is sometimes mandated in zoning. The recommended Municipal Act tools may provide more suitable areas for such specificity.</p> |
| <p>2) No campsite is permitted within 100' (30 m) of the high-water mark</p> | <p>Please refer to our recommended OP and zoning by-law amendments.</p> |

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| 3) Vegetation located adjacent to any waterbody should be retained in its natural state as much as possible to minimize impact on the waterbody. Where natural vegetation of sufficient height and density does not exist in the 100' setback area, the owner/developer shall be required to plant and maintain such vegetation and to include such matters on the site plan for the property. | Please refer to our recommended OP and zoning by-law amendments, as well as the recommended shoreline preservation by-law. |
| Buffer Zones | |
| As noted above: | |
| 1) Required setbacks/buffer zones as outlined in the 1994 Official Plan - buffer planting of 100' (30 m) and 6' (2 m) in height between tent and trailer park and adjacent residential areas | Please refer to our recommended OP and zoning by-law amendments. |
| 2) No campsite is permitted within 100' (30 m) of the high-water mark | Please refer to our recommended OP and zoning by-law amendments. |
| 3) Vegetation located adjacent to any waterbody should be retained in its natural state as much as possible to minimize impact on the waterbody. Where natural vegetation of sufficient height and density does not exist in the 100' setback area, the owner/developer shall be required to plant and maintain such vegetation and to include such matters on the site plan for the property. | Please refer to our recommended OP and zoning by-law amendments, as well as the recommended shoreline preservation by-law. |
| In addition, we would recommend calling the fence a privacy fence rather than a security fence. Since this might be an "eyesore" for residents next to a campground, the neighbors to the campground must be contacted by Township staff to determine if they want a fence or not. The fence height and composition should be defined within the bylaw or OP. | Please refer to our recommended zoning by-law amendments. Fencing is also a matter than can be addressed through site plan control. |
| Wetlands was a topic of considerable discussion since there is a significant difference of opinion on the wetlands within Waterways Campground between residents who see the area in person and RVCA who review the area at their desks on maps. Locally significant wetlands must be included in the document as well as provincially significant wetlands. Who determines if a wetland is locally significant? Who determines the size of the wetland? Both of those must be confirmed by site visits, not just desk reviews of maps. | No change to wetland buffers are recommended. |
| Buffer zones from wetlands should be the same as all other buffer zones – 30 M with the same requirements for vegetation. | No change to wetland buffers are recommended. |
| Tree Protection | |
| With respect to the proposed tree protection by-law, we agree with this recommendation. FoTenn is probably more familiar with the appropriate definition of things such as "Type of building or structure" etc., so we will leave that to your judgement. | Noted. |
| We would like to add the following: - No removal of live trees in setback areas | Please refer to our recommended Municipal Act tools. |
| Noise | |

| Comment | Response |
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| <p>We believe that the current noise bylaws in the township are appropriate No noise after 11 PM or before 7 AM (9 AM Sundays). We assume these regulations apply to Tourist Campgrounds as well as everything else – it that is incorrect, please add these to the Tourist Campground bylaws.</p> | <p>Please refer to our recommended Municipal Act tools.</p> |
| Campground Definition and Dates | |
| <p>There should be one common code for all tourist campgrounds to avoid any confusion or legal proceedings due to bylaws or OP not applying to specific codes – today there are CT-3, CT-5, and CT-7 campgrounds with different rules.</p> | <p>It is not generally appropriate to eliminate existing site-specific zones without due process. The Township may consider such process as part of an update to its comprehensive zoning by-law.</p> |
| <p>We agree with the recommendation to establish policies for Z-241 (Park Model) trailers (cottages) as noted earlier.</p> | <p>Noted.</p> |
| <p>We recommend a firm definition of open and close dates for Tourist Campgrounds of May 1 and October 31 as stated in current policies.</p> | <p>Please refer to our recommended zoning by-law amendments.</p> |
| <p>It would be prudent to specifically state that Z-241 (Park Model) trailers (cottages) are allowed in campgrounds, with the caveat that add on units are not allowed. That will once and for all eliminate any further debate about what it and what is not permitted.</p> | <p>Please refer to our recommended zoning by-law amendments.</p> |
| Administrative Penalties | |
| <p>We have only one comment – AMEN. This is truly necessary.</p> | <p>Noted.</p> |
| <p>1) Z241 trailer standards should be widely adopted by TRL. Any attempt by TRL to manage their own standards can only lead to confusion, delay and more red tape.</p> | <p>Please refer to our recommended zoning by-law amendments.</p> |
| <p>2) Police services were flagged as a cost issue in the past. It should be noted that most campgrounds have their own set of rules and bylaws, therefore any offences are managed internally; as opposed to illegal fireworks, loud music past midnight music and other offences taking place in TRL areas. The police force provides this information to TRL and is available via the privacy act, it should be presented if the issue is raised by other concerned parties.</p> | <p>Noted.</p> |
| <p>3) RMRA does not have voting rights at TRL, not sure if other campgrounds do. We are non TRL residents for the most part; nonetheless we pay a significant amount of taxes and should have a say.</p> | <p>The issue of voting rights is outside the scope of this study.</p> |
| <p>4) Cottagers have complained in the past on the use of the Rideau Waterways, not sure how that can be applied to campgrounds and not cottagers; given wide public access to boat launch, marinas, etc. The Rideau Waterways is managed by Park Canada and is available for all to enjoy.</p> | <p>This study is limited in scope to tourist campgrounds due to the nature of the ICBL.</p> |

| Comment | Response |
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| 5) Campgrounds are strategic TRL partners, our contribution to local merchants and businesses is considerable and key to their survival. We feel that small businesses have not been consulted on this matter. | Evaluating or assessing their economic impact is outside of the scope of this land use study but we agree that further evaluation by the Township is appropriate. |
| 6) Furthermore many of the points raised in your draft study apply equally to cottagers. A list of the nuisance complaints raised by cottagers should be provided to all stakeholders. | This study is limited in scope to tourist campgrounds due to the nature of the ICBL. |
| | |
| Section 2.1 identifies regulatory tools available to address issues included in the issues + options table. An important tool which does not appear in the list is the Provincial Offences Act. This Act provides directives, recommendations and guidelines for evaluating the severity of the offence, statutory penalties and prosecution process, and governs enforcement of By-laws and non compliance issues.. | The Provincial Offences Act is outside the scope of land use planning and not a recommendation of this report. Please refer to our recommended Municipal Act tools. |
| The Fotenn report recommends introducing additional By-laws and revising existing ones to stipulate penalties for infractions. Unless provisions are made for greater oversight and enforcement, enactment of the suggested additions and modifications will be a fruitless and wasteful exercise. It is widely recognised by law enforcement professionals that the severity of the penalty upon conviction has little effect on the crime rate. The major deterrent is the certainty of detection, apprehension, and conviction. The Township of Rideau Lakes must take note and act accordingly. | Please refer to our recommended Municipal Act tools. |
| It is stated within Part III of the 2020 PPS " How to read the Provincial Policy Statement " "The policies of the Provincial Policy Statement represent minimum standards." | Noted. |
| The top ranking of issue number 1, CLARITY / PROCESS , of the table highlights the fact that there is widespread public perception that the Township of Rideau Lakes planning processes need corrective action. | The issues are not listed or ranked in order of prevalence or significance. |
| The second most significant reported concern was BEHAVIOUR . Campground / trailer park operators should be required to pay into escrow a bond which would be forfeit in the event of public nuisance created by their clientele. | The issues are not listed or ranked in order of prevalence or significance. |

| Comment | Response |
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| <p>The original table and the remedial options identified in the Fotenn report show that many avenues exist within the Provincial Policy Statement and powers granted by provincial legislation to enable the formulation of an effective Official Plan and Zoning By-laws to address a large portion of the public concerns. The element that appears to be lacking to resolve these issues is initiative and will on the part of the RL Twp. exacerbated by their current lack of resources. It appears that, in common with most bureaucracies, the only mechanism for effecting change in these circumstances is the pressure of public opinion.</p> | <p>Noted.</p> |
| <p>There appears to be a serious breakdown off trust between local government and the community. Trust will only be restored between both parties when mutual respect is developed. This will not happen without engagement in good faith.</p> | <p>Noted.</p> |
| <p>Members of the community need to appreciate the many and varied challenges facing local administrators in times of reductions in resources and tightening of budgets. The local administrators for their part need to recognise that they are not the only entity facing such strictures and that the projects they manage are funded from the public purse. I.e. taxpayers. For example, squandering money on non essential items such as a revised / new corporate logo does not sit well with people who are facing difficulties due to the pandemic or living on a fixed income being eroded by rampant inflation.</p> | <p>Noted.</p> |
| <p>Recent experiences with an application to develop and expand an existing trailer park at Bass Lake caused great concern about environmental protection, water quality, densification and a whole host of other well documented objections to the proposed expansion project supported by cogent reasoning. Regardless of strong community representation and public consultation process it became fairly obvious that the outcome permitting development was largely determined by the prospect of increased taxation revenue. The balance of judgement of environmental consequences and health and safety implications issues received scant consideration. To be fair to the RL Twp. the information that they received from an external agency which they should have been able to rely on was very contentious. These matters are relevant to current discussion concerning campground / trailer park regulatory control since they highlight the continuing systemic defects of the planning application and permitting process that may have been avoided if statutory procedures were followed with exactitude and regulations applied with impartiality. The systemic aberrations encountered include:</p> | <p>This study is not able to review or comment on specific development applications.</p> |

| Comment | Response |
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| Failure to diligently investigate, in an open and transparent manner, complaints from members of the public of suspected infringement of environmental regulations. | This study is not able to review or comment on specific development applications. |
| Admitting contentious and misleading documents into the planning process. | This study is not able to review or comment on specific development applications. |
| Failure to answer questions from the public during the consultation and planning process with answers substantiated with factual evidence and to disclose the metrics that influenced their assertions and decisions. | This study is not able to review or comment on specific development applications. |
| Producing staff reports with undue bias. | This study is not able to review or comment on specific development applications. |
| Failing to implement a recommendation to adopt a policy of best practice. | This study is not able to review or comment on specific development applications. |
| Failing to prosecute offenders of serious violations of the Planning Act. | This study is not able to review or comment on specific development applications. |
| Frustrating and suppressing access by members of the public to Council as a Whole. | This study is not able to review or comment on specific development applications. |
| Denial of entitled public representation | This study is not able to review or comment on specific development applications. |
| Conclusions | |
| The RL Twp. should implement Fotenn's recommendations which by public consensus address the issues of concern. | Noted. |
| The RL Twp. should ensure that any By-law enacted as a result of Fotenn's recommendation specify penalties for non compliance and effective mechanisms in place for enforcement. | Please refer to the recommended Municipal Act tools. |
| Where RL Twp. issues a conditional licence to operate a campground / trailer park facility, there must be in place an inspection process to verify compliance at the time the licence or renewal is issued. | Please refer to the recommended Municipal Act tools. |
| Definitions | |
| The definition in the current Township Bylaws of what constitutes a trailer park "[...] any parcel of land which is used to provide temporary accommodation for the public or members of an organization in tents, trailers, tourist trailers or recreational vehicles. " - is outdated and does not reflect the use of manufactured structures as permanent seasonal accommodation. A definition of what constitutes a resort style cottage community of manufactured structures needs to be developed and criteria established as to when a campground becomes a resort style seasonal cottage community. Park model trailers although technically labeled trailers when expanded by a bolt on "add a room" are not trailers and are not readily moved or intended to be moved. They are in fact manufactured structures/cottages and the Township should specify in its bylaws that if a Park model trailer is expanded by an addition such as an "add a room" it will be deemed to be a cottage structure. | Please refer to our recommended zoning by-law amendments. |

| Comment | Response |
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| Density | |
| <p>The expansion of campgrounds using expanded Park model or similar types of trailers will result in high density development that contradicts the density bylaws in place for privately owned lake front properties. Township bylaws should be created that specify density limits for campgrounds and density criteria for a seasonal cottage community when it is no longer just a campground.</p> | <p>Please refer to our recommended zoning by-law amendments.</p> |
| Lake Impacts | |
| <p>All the effluent from shoreline septic systems eventually ends up in the lake particularly in an area where the Big Rideau Lake is situatedwhere soil is very granular and the overburden thin. Septic effluent contains phosphates and nitrates, nutrients that fuel excessive aquatic growth. The Big Rideau and other Township lakes are experiencing excessive algae growth including blue green algae a toxic cyanobacteria. Any of the septic systems that MOE would allow for a "campground" expansion of the size proposed by Summerhill will result in unacceptable increases in nutrient loading in our lake and other negative lake impacts that could well lead to resident health endangerment due increase incidents of blue green algae, loss of lake trout and other fish populations, and loss of tourism.</p> | <p>Please refer to our recommended Official Plan amendments.</p> |
| <p>As a very preliminary observation, I would note that the list of authorities consulted is narrow in the extreme. For example, the Big Rideau is shared with the County of Lanark and its Townships, which will clearly be affected by any outcomes of this matter. They should not be excluded, but embraced for input, as regulators and stakeholders. In addition, as I have previously mentioned to you, activities on abutting properties may affect UNESCO designation, which should be an issue of major concern in evaluating this proposal.</p> | <p>Neighbouring municipalities do not have commenting power on development applications in the Township of Rideau Lakes. The review agencies consulted are those with jurisdictions that apply in the Township.</p> |

| Comment | Response |
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| <p>To the issue of large rv's aka Cottagers/mobile home types being considered as real cottages and taxed ,, we don't have access year round, we are limited to the days we can go (100 for seasonal , then we pay more) ,</p> <p>off season we have no water or access , staying over night is not allowed</p> <p>All our visitors have to pay a fee</p> <p>We have to pay extra for large families</p> <p>We pay fee for boat dockage , storage ect .</p> <p>we have to be super quiet , no groups after 11 pm .</p> <p>we can be asked to leave with no recourse ,, landlord Tennent act does not apply .</p> <p>SO NO ,, WE ARE NOT LIKE COTTAGES . We are "Glampers" ,, campers with a lot of restrictions</p> <p>BTW , it is not cottagers/campers making wakes , but big house boats and cruisers</p> <p>re comment about green algae being blames on campers ,lol,, that was Westport dumping raw sewage</p> | <p>Noted.</p> |
| <p>Despite the assurance that the report applies equally to lake based and land based tourist campgrounds I am still not convinced that all the issues re a landlocked campground were identified in the exercise to date. For example a new individual lot in RLT must have 200 ft of frontage on a public road or waterfront . What would the road frontage be per campsite or campground for a landlocked campground ? Or does it matter? To be clear I am not saying there is a deficiency in the report just asking that it be reviewed from a different perspective given the changing needs of campgrounds</p> | <p>Please refer to our recommended zoning by-law amendments.</p> |
| <p>Although it was pointed out that a campground could expand by 2 campsites per year without triggering a site plan review it has always assumed this is true up to the maximum density per hectare permitted by the Township. Is this incorrect?</p> | <p>Please refer to our recommended zoning by-law amendments. We are recommending that density be restricted through refinement of the minimum site area requirement. Should a campground not be able to introduce an additional site that complies with the requirement, they would need to pursue a Planning Act process to permit additional sites.</p> |

| Comment | Response |
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| <p>From the Townships point of view maintaining the rural heritage atmosphere is part of its appeal as a destination for tourists . The balance of being a vibrant tourist attraction while offering a rural atmosphere can be achieved by spreading out the campgrounds, having a cap on the number of campsites per usable hectare of a campground , and allowing those campsites to be concentrated for operating efficiencies .</p> | <p>Please refer to our recommended zoning by-law amendments.</p> |
| <p>To date it has been stated that a Park Model trailer can replace a road trailer on any given existing site i.e. 1 for 1 . Surely it depends on the size of the sites . As mentioned at the hearing a 60 sq m minimum sized campsite has 18 sq m of coverage available given the 30% coverage rule . Each campsite requires a parking spot which ,as defined in the By Laws, is 16.5 sq meters leaving 1.5 sq meters for a deck, accessory building and the tent ,road trailer or Park Model trailer . Clearly a campground owner, when upgrading ,must plan their site sizes to allow for differing sizes of accommodation and anticipated needs.</p> | <p>Please refer to our recommended zoning by-law amendments.</p> |
| <p>The issue of compliance was mentioned a number of times by residents as a need and by campground owners from a 'being targeted' point of view . Many of the issues which are subject to compliance, for example building permits, are monitored by RLT for both individual owners and campgrounds. Due to the difference in the property tax structure it may be necessary to introduce licencing fees so the 1,500 seasonal residential sites in campgrounds are monitored in the same way the seasonal and permanent residents with RLT properties are monitored.</p> | <p>Please refer to our recommended Municipal Act tools. A licensing by-law is recommended.</p> |
| <p>The larger issue re compliance is the various services which are not controlled directly by RLT in the campgrounds such as sewage ,electrical etc. . Surely, it is in the best interest of the township and residents of the township for RLT to setup a method of monitoring the various agencies to ensure consistent review. This coupled with the suggested regularly signed self compliance declaration would help ensure RLT has visibility into what is happening at all RLT residential locations.</p> | <p>It is outside the scope of this exercise to mandate agencies to undertake constant monitoring, however, agencies such as MECP do have a hotline to report non-compliance. Please refer to our recommended Municipal Act tools. A licensing by-law is recommended.</p> |
| <p>Without expertise or comparative information it is difficult to comment on which of the documents ,Official Plan, By-Laws ,etc. should be amended for the various topics identified .Hopefully FoTenn will be able to flush out these comparisons ,as the process continues ,and will take them into account as they make their recommendations .</p> | <p>During this exercise we have reviewed the zoning by-laws of 20 municipalities within Ontario. Our recommended zoning by-law amendments are influenced by this review.</p> |

| Comment | Response |
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| <p>My concern is potable ground water supply in areas in close proximity to any and all so called tourist campgrounds. Even though I have a personal concern on this matter, specifically with regard to Waterways Resort, my concerns include any similar situation in our township.</p> <p>In most cases, these campgrounds are populated by tent trailers and towable RVs, both trailer hitch or fifth wheel, almost all of which are full seasonal occupancy. The water consumption of these units is limited by the type of amenities available within the units, usually kitchen sink, toilet and shower. With the consistent conversion of these units to park model style mobile homes, the quantity and usage of amenities inside these newer upgraded units is significantly increased. In effect what is happening is the replacement of a weekend getaway type holiday situation to a full time seasonal home. There is no reason to argue that these Park Models are not homes. And as such, in any plan of upgrade or expansion it would seem prudent that a comprehensive Hydro-geological assessment be made by a non biased independent firm. The existing ongoing conversions at Waterways as an example have proceeded without any regard to this issue. In fact, one of the campground owners presenting in the meeting last evening made the inaccurate claim that these new units will not have any greater water usage than older style RVs but adding these new units are far more comfortable. More appliances mean more water consumption in my view. This type of misinformation is very troubling and I will vigorously dispute this claim. There is only so much water flowing in aquifers in the ground beneath our feet. Some places are blessed with more than others, but no matter where you are, that supply is finite. In our own situation in our home the water supply is just adequate and we live a fairly frugal water usage lifestyle. People coming from urban situations where the supply of water is limited merely by the ability to pay may not understand this and expect an unsustainable usage. These "campground" operations MUST be planned with this in mind. To not assay the water supply potential in every planned project prior to implementation is sheer folly. The effect on neighbouring properties needs to be addressed. Any resident in our township should rest confident that they will not wake up to a dry well because of private commercial activity proceeding on a wing and a prayer that all will be well. It is called responsible oversight and must not be neglected. To do so invites disaster not to mention legal issues. Please address this most important issue in your recommendations within your study</p> | <p>Hydrogeological assessments are performed by qualified practitioners and can be required by the Township in support of an application. Our recommended OP amendments would clarify the requirements around supporting studies. Additionally, with regard to Z241 park model trailers, please see our recommended amendments to the zoning by-law.</p> |

| Comment | Response |
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| Septic Systems | |
| <p>The septic inspection program implemented by TRL over the past few years is an essential activity that should be continued diligently as a tool to protect water quality in the Township's lakes. For the design and installation of new systems for multiple users, however, the MOECP has both the jurisdiction and the expertise for permitting, with a possible backup from the relevant Conservation Authority. The Township should rely on those two authorities and will be wasting its resources if it were to get involved in the permitting process. The Township should consider stipulating phases for a large expansion (such as the Summerhill project) and an assessment of the effectiveness of the septic system by the MOECP could be required before a subsequent phase of construction were permitted.</p> | <p>Both the MECP and conservation authorities with jurisdiction provide permits for development within their jurisdiction. Large septic systems are regulated by the MECP. The Township is not able to mandate phasing of large developments but can work with applicants to encourage this where appropriate.</p> |
| Tourist Campgrounds | |
| <p>There has been an evolution from "seasonal and temporary accommodation through the use of tents, recreational vehicles and/or trailers" to the permanent installation of mobile homes. These are NOT the same uses, even if the mobile home is delivered on wheels since once it is installed, the wheels disappear forever and the demand for infrastructure (water, sewer, electrical) becomes a "base load". Accordingly, the existing regulatory scheme (OP and by-laws) that were intended to cover tents, trailers, and RVs needs to be supplemented by new rules to address a new use of the relevant site. Trying to bend and contort the existing rules intended for camping trailers or RVs that stay in place for a few weeks and then move on is not going to serve the Township and its lakes very well.</p> | <p>Please refer to our recommended zoning by-law amendments that pertain to seasonality of use.</p> |
| <p>Multiple tools are clearly required: OP policies that reflect the new concept, ZBL changes to implement the OP policies, including the use of holding zones to control phasing. Site Plan Control which starts with an accurate survey as the starting point, shows the planned phases and includes securities to ensure the provision of the relevant infrastructure work, as provided under the Planning Act.</p> | <p>Noted.</p> |
| <p>Specifically can you advise what fact checking processes were undertaken to ensure the validity of the issues put forward against Campgrounds in the Draft Report.</p> <p>It would not be reasonable to suggest options as serious as changes to by-laws or the Official Plan solely on volume of comments on a specific issue. The comments need to be substantiated to support and ensure the integrity of the decision making process. It is also critical to ensure that this is not a campaign of misinformation, or frivolous, untimely, solicited or vexatious commentary.</p> | <p>The purpose of this study has been, in part, to identify issues pertaining to tourist campgrounds. The issues included have been received from the public, campground operators, lake associations, and the regulatory agencies consulted.</p> |

| Comment | Response |
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| A major concern of stakeholders with regard to campgrounds is a potential for degradation or failure of a large subsurface sewage disposal system (LSSDS) which have a flow rate of >10,000 litres/day. This may occur for a variety of reasons ranging from using them outside of their design limits, component failure or end of life cycle. The impacts of such issues can be extremely harmful to the biodiversity. | Noted. |
| To reduce the potential for environmental damage from LSSDS's <i>I wish to see a requirement, in the zoning bylaw, for automated monitoring and reporting of key system components of the LSSDS. The monitoring should be continuous and automatically uploaded to the MECP and the Township of the Rideau Lakes with reports generated regularly (suggest monthly and annually). Reports should be made available to all stakeholders.</i> | It is outside the scope of a zoning by-law to require monitoring and reporting of septic systems. Monitoring of large septic systems falls under the jurisdiction of MECP, with smaller systems falling under the jurisdiction of the Township through the Ontario Building Code, rather than zoning. |
| As the design authority for LSSDS is with the MECP, I believe that they are best suited to review the automated monitoring system design. The MECP may use an adaptive management plan to deal with events that occur from the monitoring process. This system would give the MECP environmental officer a heads up on potential problems for them to monitor and take action as appropriate. This quick action would minimize the threat to our environment. | Noted. |
| A report to the planning and advisory committee April 14th 2021 for a campground policy review and authored by Brittany Mulhern (manager of development services) indicated in that report that "while some of the issues that are beyond municipal jurisdiction, they do encompass broader public interest and are issues to be considered or that may be raised through the review processor and require interagency communication and coordination to address" This is a good example where this cooperation could be used. The township and the province would be partners in this endeavour. | Noted. |
| <i>Also of concern to stakeholders with regard to campgrounds is impact on groundwater. A similar requirement for automated monitoring in the zoning bylaw should be used to ensure no degradation of water supply when a permit to take water is required.</i> | Noted. As above, monitoring of groundwater resources does not fall under the zoning by-law. |

| Comment | Response |
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| <p>Many of the issues brought up can be dealt with quite easily without giving in to the wealthy who would like to keep "nature" all to themselves. In our campground we have fireworks once a year. We hear fireworks from the cottages near us almost weekly. We can certainly decrease the lighting in our campground. Will the cottages across the lake from us refrain from lighting up the sky every night? How about the destroyed fish habitat from the altered shorelines in front of the massive homes with manicured lawns? Will this also be addressed by the township? Our relatively small boats are regularly rocked and sometimes damaged by the huge boats speeding past our docks. Any shoreline damage caused by the wakes of boats docked at campgrounds pales in comparison to the impact of the large cruisers that regularly come through the locks. As long as regulations apply to all users and residents, I'm all for trying to address the concerns in your report</p> | <p>Noted.</p> |
| | |
| <p>IF these options are not recommendations what process will move them to that status?</p> | <p>This final version of our report provides our recommendations to Council.</p> |
| <p>I'm a veteran, I have a trailer and seasonally camp at a campground and do leave/pull out as often as I like. I do not own a home and travel "full time" in my trailer. I DO NOT have a "park model". I hope you will not be forcing me out of my campground because we do not comment like cottagers that seem realize how much money us seasonal campers spend seasonally in the surrounding communities. I leave and need a small shed to keep items I don't want to travel with.</p> | <p>Noted. Please refer to our recommended zoning by-law amendments which include consideration of seasonality.</p> |
| <p>I would like to commend the Fotenn team on what I consider to be a very clear and thorough document. My concern is that recommendations clearly include details around compliance. I believe that the discussion around licencing is extremely important. As complete as the recommendations and their subsequent implementation may be, it is important that a process be in place to ensure that compliance can be ensured.</p> | <p>Please refer to our recommended Municipal Act tools. A licensing by-law is recommended.</p> |
| <p>Please make sure you get those Parks Canada comments documented and attributed to the individual who made the comment. Every time we talk with them, we tend to get a different answer - in particular, someone at Parks told one of our members that they have NO influence on development above the high water mark - which is not what they said to you</p> | <p>This report which has detailed the role of Parks Canada has been reviewed and approved by the agency for its accuracy capturing their role.</p> |
| <p>The popularity of Airbnb has brought a very different clientele to waterfront facilities. In most instances some users of Airbnb have dramatically changed the character of the places these clients have come too. Has any thought been given to this likelihood and the impact like this?</p> | <p>The use of private property by individuals on websites of Airbnb has not been contemplated by this land use study. The purpose of this land use study is to address the tourist campground use. Short-term rentals such as Airbnb are an emerging issue in land use planning which overlaps with tourist campgrounds but is complicated in that it also makes use of residentially-zoned properties.</p> |

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| Will the recommendations, when made, be only directed toward new campsites - or will current sites have to be brought up to the new code? | The Planning Act recommendations in this report would grant legal non-conforming status to existing campgrounds. The Municipal Act recommendations may also grandfather existing campgrounds subject to the way in which those by-laws are crafted in future. |
| Central principle of judicial process is that discussions with the judge - with only very extraordinary exceptions - should have both parties present (rule against ex parte communications). A separate meeting with campgrounds would violate this principal of fairness. One must question what it is that they can't say to all parties. | There have not been additional meetings with campground operators. |
| In response to comments about 'mobile homes' we wish to state that at Waterways, we do not have mobile homes. A mobile home is built under a different code. There are NO mobile homes at Waterways. There are both seasonal RVs and seasonal park model trailers. There have been both types of trailers for 30 years at Waterways. All park model trailers and RVs are treated identically. They do not have their wheels removed - we do not allow this, nor do the building permits. Park model trailers are not permanent structures. Park Model trailers can be moved from time to time just like RVs. We have over 40 RV's that exceed 25 years of age at Waterways - this suggests that people with a RV can (and usually do) stay as long as a family with a RV. We close for 6.5 months a year - we do not allow people to 'live' in a trailer at our park. | Noted. Please refer to our recommended zoning by-law amendments. |
| Summerhill do not claim that these park model trailers will be there for 30 years. Yes, agreed - they are not the type of trailer that moves week to week - but nether do 96% of the RVs at Waterways - they all stay the full season and are kept all winter at our campground. We also need to place on record that this is not a new thing - park model trailers have been in Waterways for 30 years. We have also been approached by MPAC to confirm that park model trailers WILL be assessed for tax purposes. | Noted. |
| The difference between cottage property and campground is that we have opening and closing dates and mostly 6 month of usage. Most parks have policies in place to deal with age of trailer. We at Sunnyside also have a policy that members can not exceed 90 days in a season. Maybe the study should also consider the policies already in place in most parks. | Please refer to our recommended zoning by-law amendments. |
| A recreational vehicle is defined by maximum square footage of 400 sq. ft. as to Canadian standards | Our research found that an RV in Ontario can be no longer than 14 metres and no wider than 2.6 metres which results in a maximum square footage of 392 sq. ft. This is the data used for creating the RV site area recommendation of this report. |

| Comment | Response |
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| <p>Since this study is specifically targeting the “Tourist Campgrounds” within TRL, is there any intent to have a stakeholder session with the business owners as a group in advance of your recommendations? I say this as some of your recommendations may not be controversial at all and I assess there are issues we may get behind??</p> | <p>Currently, there are no plans for further consultation with individual stakeholder grounds, all future consultation will be with all stakeholder grounds and members of the public. A meeting with campground operators was held earlier during Phase 1 of the study.</p> |
| <p>I still do not see anywhere in the report a commitment to look at the underlying data?? For example, traffic counts, hydro usage, police reports to assist in the dev of the options?</p> | <p>Technical evaluation of matters such as traffic, hydro, hydrogeological, etc. conditions is undertaken through specific development applications and is not within the scope of this study. Individual development applications would include evaluation of such technical considerations.</p> |
| <p>Is Fotenn saying that they are unable to tell the Township that there is an extensive concern expressed about the terminology of “Tourist Campgrounds” and that some better definitions are required?</p> | <p>The recommendation of this report is not to change the definition of tourist campgrounds, rather it is to define other terms that affect the use. Please see our recommended zoning by-law amendments.</p> |
| <p>Density must include definition of site or trailer. As well with in campground policies is We have policies for numbers of persons on a site 2 adults, 2 children max 6 people. Density must include # of persons as some trailers (units) industry standard of a trailer is how many people they sleep. Definition as 1 site could have 1 tent or 3 tents hard to determine density of #s of persons.</p> | <p>Please refer to our recommended zoning by-law amendments.</p> |
| <p>Could the expansion of tourist campsites as abutting properties to the Rideau Canal affect the UNESCO world Heritage Site designation of the canal?</p> | <p>Parks Canada has commenting power on development along the Rideau Canal and would address this concern. In short, yes, such expansions have the ability to affect the designation and Parks Canada reviews proposals to protect the designation.</p> |
| <p>We truly need the municipality to be transparent about why they commissioned this study. Imposing restrictions such as tree removal on Campgrounds but not on land owners is two tier governance. Such discriminations could result in court challenges which I would support.</p> | <p>This study was triggered under the Planning Act through the passing of the Interim Control By-law by Council.</p> |