

Chair of the July 22, 2020 Public Meeting for the Ardoch Lake Condominium proposal.

Dear Chair

As the President of the North Frontenac Lake Association Alliance, I speak on behalf of the 20 Lake Associations located within the Township. These Lake Associations are aware of the ongoing discussions that the Ardoch Lake Condominium Proposal has involved. At this stage, most of what needs to be said may be considered, by some, to have been said and that the marathon is nearing the finish line.

Our 20 Lake Associations, representing a very significant majority of the Township's tax base, seriously disagrees with the introduction of lot size averaging as an approach to justify that the development is in compliance with the Official Plan. The outcome, if accepted, will be that 16-17 of the 23 lots will be below the 77 metre waterfront frontage as set forth in the Township's Official Plan of May 2017. We disagree with the various ways and means by which other factors are used to consider the plan in compliance. It was always considered, throughout the Official Planning Process, that lot area and water frontage would be base line minimums to be enhanced by other environmentally appropriate interventions.

Those responsible for taking this decision should be aware that:

1. The Federation of Ontario Cottagers Associations has no knowledge of lot averaging being used to permit lowering the lot area and frontage below that of their Township or County's Official Plan. FOCA is the largest coalition of lake front property owners across the province.
2. Today, July 22, during the meeting of the FOCA Board of Directors, the Directors express alarm that this was happening, spoke to the precedent setting consequences of a favourable decision, also reinforcing no known cases of lot size averaging.
3. The Chair of the Lake Networking Group, a well known, broad-based lake association network in the wider region, also expressed concern that this approach was being considered and further reinforcing that lot size where a base to be enhanced by other measures but not reduced by use of other environmental and social/political factors. The NFLAA, as with FOCA, recognizes the need for development. We recognize the thin tax base in many sectors of our rural areas. This is not the issue. The issue is development in compliance with agreed standards.

The NFLAA requests to have these comments put into the record of this meeting showing that our Alliance of 20 Lake Associations is not in agreement with the use of lot size averaging to justify approval for the proposal.

It is not a legitimate claim and puts the Official Plan's credibility at risk of further misuse if subject to the precedent this proposal will have, if approved.

Thank you for your consideration of our submission

**Bruce H Moore**

President, North Frontenac Lake Association Alliance  
and Member of the Board of the Federation of Ontario Cottager Associations  
613 862-4817 Mobile  
[brucehmoore@gmail.com](mailto:brucehmoore@gmail.com)