New Zoning By-law Project
Final Draft Covering Report

Prepared for:

The Municipality of Huron Shores

Peter Tonazzo, RPP

Land Use Planning Consultant

December 3, 2025

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1 Introduction

This report provides a summary of public comments that have been received to date. This report, the attached written comments and revised Draft Zoning By-law are presented as information. Should Council be satisfied with the draft Zoning By-law, it is staff's intention to present it for Council approval during a formal public council meeting in February 2026.

A virtual public open house was held on Wednesday August 20th, from 7-9pm via Zoom, which included a presentation[1] followed by a question-and-answer period.

On Thursday August 21, an in-person open house was held from 4-7pm at the Lion's Hall. The format was come-and-go, where information was provided about the Draft Zoning By-law and staff had computers available to review specific zoning questions that participants had about their property. Both public sessions were advertised in the newspaper, online and social media. In total, approximately 40 individuals attended the sessions.

In addition to comments received at the public information sessions, a number of emails and letters were also received, including 17 submissions of a 'pro forma' letter. All written comments were submitted between August 26th and November 28th. Responses were provided between October 29th and November 28th. Along with the response, individuals were asked to confirm if they wanted their written correspondence attached to this report, with a December 1st deadline to confirm. A number of individuals did not wish to have their comments made public and others did not confirm as of the writing of this report. For those that confirmed, their written comments, as well as responses to those comments (highlighted), are attached as appendices to this report.

2 Summary of Public Consultation to Date

A potential aggregate pit/quarry in the Walker Road/Lane area dominated the correspondence received to date and the majority of the comments related to the potential pit/quarry were generally oriented toward Official Plan policies. A total of 17 submissions consisted of a 'pro forma' letter, which is attached.

At some point this spring/summer, neighbours raised concerns about exploratory drilling occurring on a property in the Walker Lane/Road area. The property abuts the rail line and is approximately 1.5km north of the Lake Huron shoreline. The property is not zoned or designated to permit an aggregate pit or quarry; therefore, rezoning and official plan amendments are required, in addition to a pit license under the Aggregate Resources Act.

Members of the public also provided feedback on other key Zoning matters, including:

- Various setbacks, including setbacks from waterbodies.

[1] Virtual Public Open House Presentation - 2025 Zoning By-law Review

- The appropriateness of permitting up to 3 hens on non-agricultural properties.
- Comments on specific zones and how they are applied to specific properties.
- In some cases, comments received asked for greater flexibility and less regulation, yet in other cases, especially from those in the Walker Lane/Road area, greater land use regulation was requested, especially as it relates to protecting natural heritage features and the existing character of cottaging areas.

3 Major Changes to the Final Draft Zoning By-law

The comments received to date, along with further discussions with Municipal staff and Council direction resulted in a number of changes to the initial Draft Zoning By-law which was presented to Council on June 11, 2025. The major changes are discussed in greater detail below.

3.1 Map Changes

The following properties are proposed to be rezoned:

1. 1423 Basswood Lake Road – Camp Eden – Rezone the portion of property occupied by the Resort, from Waterfront Recreational to Recreational Commercial, to recognize the Camp Eden, in accordance with Applications 2022-C-03 and 2022-Z-03 which were approved by Council.
2. 38 and 40 Portage Street – From Waterfront Recreational to Waterfront Residential - Appropriate given this portion of Portage Street is publicly owned and maintained on a year-round basis.
3. Non-address property East of 13 Mississagi Cres. – From Residential Low Density Zone to Community Facilities Zone, to recognize the existing use as a Municipal Public Works facility.
4. Non-address properties south and east of 21467 Hwy 17 – From Highway Commercial Zone to Rural Zone, as per Application 2021-C-06 and 2021-Z-06 which were approved by Council.
5. There were several islands in Lake Huron that were not zoned. All Islands in Lake Huron that are within the Municipality are now zoned Waterfront Recreational.

3.2 Short Term Rentals (STRs) (Section 2.66)

As per Council direction provided on August 13, 2025, STRs have been defined and permitted in any zone that permits a residential dwelling unit, including principal and recreational dwellings. Therefore, STRs are proposed to be permitted in Waterfront Recreational Zones and any other zone that permits a recreational or principal dwelling unit.

The definition defines STRs as dwellings which are offered for temporary accommodation of not more than 28 consecutive days in exchange for payment. Bed and breakfasts, which are defined and regulated elsewhere in the by-law, and

other short-term accommodation where there is no payment, are excluded from the definition. Short term rentals may not be offered in a recreational vehicle (RV).

This relatively permissive approach relies on existing by-laws and regulations to control STRs, which is within the overall intent of Council's direction. During public consultation, most of the comments received were in support of STRs, with a general recognition that they positively contribute to the local tourism ecosystem. If STRs do become a problem, Council can certainly take future steps to address them through stronger regulations and controls.

3.3 Setbacks from Waterbodies (Section 4.2)

A significant discussion point has been around required setbacks from waterbodies. The current zoning by-law requires a 30m setback for all buildings and structures, including septic systems. There is a relatively even distribution among Municipalities in Ontario, with some requiring a 15m setback and others requiring 30m. Algoma Public Health only requires septic systems to be setback 15m. The current Draft requires all buildings and structures to be setback 30m from a shoreline, however septic systems, decks, viewing platforms, saunas, sheds and other structures with a gross floor area of less than $10m^2$ ($107.6ft^2$) may be setback 15m from the shoreline. This is essentially proposed as a balanced compromise, which ensures that larger main buildings maintain a 30m setback, but allows smaller structures and underground septic systems to locate within 15m of a shoreline.

3.4 Small-Scale Agricultural Uses Accessory to a Principal Dwelling (Section 4.30)

This section permits the keeping of up to 3 hens as an accessory use to a principal dwelling. The keeping of hens is not permitted in a waterfront recreational zone or where the dwelling unit is not occupied on a year-round basis. Roosters and all other forms of livestock are prohibited, unless agricultural is a permitted use (Rural and Agricultural Zones) and the lot is large enough to support the use. Hens are not permitted to roam freely and must be kept in an enclosure, a minimum size of $0.37m^2$ per hen. Enclosures are permitted in a rear yard only and must be setback a minimum of 4m from any lot line.

While it is recognized that issues can arise from small-scale agriculture, the overwhelming majority of those that participated in the public consultation were supportive of permitting small-scale keeping of livestock, with hens often referenced as an appropriate example.

3.5 Flood Prone Areas

Tulloch Engineering undertook an assessment to determine the determine the requirements of implementing a 2-zone concept consisting of a floodway, where development would be largely prohibited, and a flood fringe where development would be subject to specific regulations.

Upon further review, it was determined that there would be very little gain in implementing a 2-zone flood concept. Development within the flood fringe would

require significant Engineering studies, and as per Tulloch's recommendation, would actually be prohibited if there are areas beyond the flood fringe.

Most forms of development will be prohibited from locating within the regulatory flood line. Should proponents wish to develop within the flood line, this can be addressed through a rezoning application, with the same studies that would have been required to develop within a flood fringe.

3.6 Zone Exceptions

Since the current Zoning By-law was approved in 2018, Council has approved 29 site-specific 'zone exceptions' to date. In addition, 9 site-specific zone exceptions were incorporated directly into Zoning By-law 18-18. Continuing to add new site-specific zone exceptions to the comprehensive zoning by-law is cumbersome from an administrative and formatting standpoint. Therefore, the 9 zone exceptions in By-law 18-18 have been removed, and a new 'Zone Exception Office Consolidation' document has been prepared and will be presented to Council in February, along with the Draft Zoning By-law. A GIS layer has also been created so that staff can easily cross-reference site-specific zoning provisions on a property, which may grant additional rights, such as reduced setbacks, as approved by Council through a rezoning application. The actual site-specific by-law(s) passed by Council still prevail, and this exercise is largely administrative and intended to provide a document and mapping layer that can be easily referenced by staff.

4 Next Steps

It is staff's intent to present the final Draft Zoning By-law for approval at Council's meeting in February 2026. Public notice will be provided in accordance with the Planning Act. In addition, those who indicated they wanted to be on the Zoning By-law stakeholders list will also be notified. As per the Planning Act, members of the public will have the ability to provide written or oral comments at this meeting.

5 APPENDIX A – Correspondence and Responses - Christopher Rose

From: "Christopher Rose" <[redacted]>
To: "p tonazzo" <p.tonazzo@shaw.ca>
Sent: Friday, November 28, 2025 5:01:46 PM
Subject: Re: Comments on Draft Comprehensive Zoning By-law

Hello Peter,

Thank you once again for all of your assistance in answering my many questions regarding the comprehensive zoning bylaw and the process utilised for designing it. I have gone through our correspondence and my recollection of our conversation and have extracted the following narrowly focused points for consideration in the December 2025 review of the draft comprehensive zoning document. These comments were mentioned in our previous communications and are based on the August 10, 2025 version of that draft document:

1) The distinction between a Dwelling identified as 'Recreational', a Dwelling identified as a 'Residential Structure' and a Dwelling identified as 'Principal' is unclear as the 'use' for a residential structure includes 'use' as a recreational dwelling, and also as it is my understanding that the relevant tax rules do not require that a principal residence is designed and maintained for year-round use. This issue carries into the sections of the draft comprehensive zoning bylaw dealing with Waterfront Residential and Waterfront Recreational zoning.

2.26 Dwelling, Recreational

A building used as temporary dwelling unit for recreational purposes that is not the principal residence of the owner. Such dwellings are often referred to as camps or cottages.

2.27 Dwelling, Residential Structure

A building designed and used for year-round, permanent human habitation, consisting of one or more dwelling units. Residential structures can be the occupant's principal dwelling. Such uses include but are not limited to the following:

- *Apartment Dwellings*
- *Single Detached Dwellings*
- *Semi-detached dwellings*
- *Multiple-attached dwellings*
- *Accessory and additional dwellings*
- ***Recreational dwellings***
- *Assisted living units*

3.11 Dwelling, Principal

The main home where an individual resides, and is designed and maintained for year-round use. Such dwelling is designated by the owner and/or occupants as the ***primary place of residence for tax purposes.***

I do recognize that under Canadian Tax Law, there is nothing stopping someone from using their cottage as their primary residence for tax purposes. Having said this, defining principal vs. secondary residence can be very difficult. Traditionally, zoning by-laws utilized seasonality or even where more time is spent, but with retirees spending 6 months or more at a 'cottage', this too has proved difficult. Unfortunately, the definition is not perfect and could open the door to permit principal dwellings that may not actually be 'principal' dwellings, however I am of the opinion that doing so is to error on the side of caution, and better than the opposite.

2) In relation to Section 4.2 of the 2025 draft zoning bylaw and Section 4.1.8 of the PPS – might it be appropriate to acknowledge that the PPS effectively specifies different minimal setback in areas designated as 'coastal wetland' and 'adjacent lands' in the zoning bylaw. Might it also be appropriate to note that the minimum watercourse/wetland setbacks in the case of tributaries/coastal wetlands within the 2km protection zone defined in 4.1.8 of the PPS will generally be 120m rather than the 30m water body setback for non-coastal wetland areas specified in S.4.2? Could this be achieved by means of language that states in effect:

Notwithstanding any other provisions in this By-Law, the following minimum setbacks apply from any lake, river, creek, stream or other watercourse, 'unless a greater setback is provided for in the Provincial Policy Statement'.

The 120m 'adjacent lands in the PPS only applies to specific natural heritage features, such as wetlands that have been designated as 'Provincially Significant'. The PPS, current and Draft OP's already specify 'adjacent' lands within various contexts. Simply applying a 120m setback from all watercourses and natural heritage features would significantly impact development potential, if not eliminate development potential on most waterfront lots, not to mention make most developed waterfront lots legal non-conforming.

The Draft Environmental Protection Zone will be utilized to essentially freeze development in or adjacent to appropriate natural heritage features, which will be identified through the Official Plan or a Planning Act application. As previously discussed, the EP Zone is currently a placeholder. Upon approval of a new OP, appropriate lands may be zoned EP should they warrant it.

I will also be submitting suggestions for bylaw changes beyond the scope of narrowly defined zoning considerations and also suggestions regarding OP changes by separate email messages.

Thank you once again for your consideration of my concerns.

Yours sincerely,

Christopher Rose

6 APPENDIX B – Correspondence and Responses - Thomas Mills – 43A Walker Lane

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From: "Thomas Mills" <[redacted]>
To: "p tonazzo" <p.tonazzo@shaw.ca>, "Amber Burgler" <amber@huronshores.ca>
Sent: Tuesday, November 18, 2025 1:22:06 PM
Subject: Re Extended Feedback of Zoning Bylaw

Submitted for consideration

November 18, 2025

Submitted for consideration

Because it is a shrinking commodity, we must protect Farmland in Huron Shores

According to the census, Ontario is losing 175 acres of farmland every day to urban development.

We can no longer afford to look at farmland in Huron Shores as empty land. It must be protected.

Indisputably:

- Farmland/arable land is a non-renewable resource

- We need to grow food somewhere

- Farms are an integral part of the provincial and our municipal economy

- Farmland has many environmental benefits. food, wildlife, groundwater etc.

- Climate change; it becomes more and more important that we revitalize, maintain, protect and develop our farmlands in Huron Shores; it's not that we have an over-abundance!

My point;

In navigating Huron Shores existing by-laws, the official plan and the new drafts I fail to find (or maybe I'm just Old) any significant emphasis being put on protecting arable farmland.

Whenever there is a potential that arable lands will be lost to rezoning the adverse effects and impacts should weigh heavily in the approval process!.

Remember they are not making any more arable lands and there seems to be an absence of control within your new drafts.

When I and others visit and read the "Municipality of Huron Shores ABOUT HURON SHORES" mandate on their website I morally gain confidence that this will be addressed in the New Drafts

Thank you

Tom Mills 43A WL & 98 WR

It was not my intent to link Development Charges to my Easement situation

The recommendation that I put forward was a means to alleviate impact costs from being past onto Huron Shores tax payers for the benefit of a few.

I draw on the fact that 216 of 444 municipalities in Ontario have Development Charges supported by the ACT.

Local municipalities being Sudbury who have a Bylaw and Sault Ste Marie who don't have a Bylaw but address it in their Official Plan.

Regards Tom Mills

Hello Mr. Mills,

The draft OP does contain a variety of policies aimed at protecting agricultural lands, more specifically, Section 5.1 recognizes agriculture as an important part of the Municipality. Section 9 limits rural lot severances where class 2-3 soils are present, unless certain conditions can be met. Furthermore, Section 9 permits a variety of agriculture related and on-farm diversified uses in association with an active farm, which in short is intended to give farmers revenue generating options to 'help them through the winter', and to the greatest extent possible, avoid severing away lands to obtain money to keep the farm going, noting that severing lands away takes away from food production.

With regards to soils classifications in Ontario, Class 1-3 soils tend to be the most productive, with Class 7 having no capability for agriculture. There are no class 1 soils in Huron Shores, but there are some areas with Class 2 and 3 soils. In the case of the potential quarry property, Ag maps shows it as having Class 7 soils. If you google 'agmaps' it will bring you to an interactive map where you can zoom in, add/remove various layers. The soil classification layer is under 'environment/Base data', than expand Ontario 'Soil Survey Complex', then toggle on the last one, 'soil capability for'. The map will show two numbers, it's the first large number that is the overall soil classification. You can also make the layer transparent so you can see the parcel beneath, which helps with orientation.

As noted in my response to the 'pro forma letter', DC's may not be the best option. The Municipal Act allows Municipalities to enter into agreements to recoup costs created by developments, such as road upgrades and road maintenance. Such agreements can be specific to the development, whereas DC's tend to be 'point of sale' fee's that are established long before a particular development is brought forward. We can certainly discuss further.

From: Thomas Mills <[redacted]>
Sent: Thursday, September 4, 2025 1:06 PM
To: Amber Shannon <Amber@huronshores.ca>
Subject: My Added Comments on The New 2025 Draft Zoning By-Law

Amber please forward this to your Planning Consultant Peter Tanazzo for a response.

Thank You in Advance

Tom Mills

Peter I did forward comments via email on Aug 14th and you did attend to them at the Aug 21 presentation. However I'd like to revisit the rationale that you highlighted and inserted in your

reply as it relates to my Comment # 3 regarding ''ADU's . specifically disqualifying properties that *"Do not benefit from frontage on a Municipal owned and year-round maintained road"* .You wrote:

T*he theory is that even with legal access additional development on private roads leads to additional pressure to assume and/or maintain the road, which is not feasible, especially given the rural development.*

I offer you the following rebuttal: Legal Easements are Perpetual and do not necessitate nor do they obligate the Municipality to take them over without approval.

A new recommendation: Offered for consideration and adoption into the new 2025 Zoning By-Law and the HS Official Plan to offset Impact Cost!

As a basis for approval other Jurisdictions have adopted the slogan "Growth pays for growth" It is a common means for municipal councils and ratepayers not having to absorb the cost of expanding or upgrading municipal services through increased property taxes. Infrastructure costs should be paid by those who use and benefit from the installation of expanded services.

For consideration

Tom Mills

On Sun, Sep 7, 2025 at 11:59 AM PETER TONAZZO <p.tonazzo@shaw.ca> wrote:

Hello Mr. Mills,

Thanks for your comments! Development on private roads remains a 'hot button' issue in Huron Shores. I appreciate your approach and as noted, I am considering potential alternatives, and certainly, if Council deems it to be appropriate, they have the ultimate authority to decide upon the overall approach and specific regulations around development on a private road.

I do however wish to clarify the 'growth pays for growth' slogan. This concept is used to justify Development Charges (DCs) under the Development Charges Act, on the very basis that in certain circumstances, growth does not actually pay for growth in the absence of Development Charges.

From: Thomas Mills <[redacted]>
Sent: Thursday, August 14, 2025 12:55 PM
To: Amber Shannon <Amber@huronshores.ca>
Subject: Questions and Concerns Relevant to the New 2025 Draft By-Law

Amber please forward these to your Planning Consultant Peter Tonazzo in advance of the Aug 20, 21 presentations.

Anxious for his reply

Thank You in Advance

Tom Mills

1) Regarding *Definitions* specifically *"Adverse Effects"* currently in the 2023 version of the Bylaw as 3.1.8 i) . It is not in the New Draft. Given the weight of that definition, its inclusion in the New Zoning By-Law

would add strength and clarity to Section 1 "Administration, Enforcement and Interpretations" .thus easing/guiding the approval process for Minor Variances (Section 45 of the Planning Act) and all Applications for relief of Zoning provisions and Rezoning Applications under Section 34 of the Planning Act .

Fair point and this exact point has been raised by another individual, especially as it relates to the Official Plan. It has been taken out of the Official Plan because it is defined by the Provincial Planning Statement (PPS) and seems redundant to define in the OP, however for clarity I am open to defining in the OP. In terms of the Zoning By-law, there were many defined terms that were not actually located anywhere in the zoning by-law. Such is the case with 'Adverse Effects' – such wording is not used in the zoning by-law, which is regulatory, and implements the policies of the OP. Again, open to putting it back into the OP, but I'm not sure it belongs in a zoning by-law, which is regulatory (black and white) whereas a term like adverse effects can be interpreted in many different ways, and it is a QP that would determine 'adverse effect'. This also speaks to the overall applicability of the OP vs. Zoning, which is a much broader discussion.

2) The June Background Report states the intent of the New Draft is to instill Clarity and Simplification; in doing so we trust it does not come at a cost to the environment and not being simplified to the point that Section *5.18 "Environmental Protection - EP"* of the New Draft is void of any areas of concern. Environmentally sensitive areas that were previously identified have faded away in the new draft. Examples: the bird nesting area and fish habitat areas that border Thessalon First Nation Reservation to the West and the North Channel Inshore Provincial Park (Waterway Class) to the East side of the Reservation .Section 3.1 of the Background Report states "the current Zoning by-Law has served the Municipality well" Sec3.3 states "the by-law will be developed in a manner that maintains current rights afforded to various properties in specific zones"

Given the strong objections to Bill C-5 by First Nations due to its potential to undermine indigenous inherent rights and the consultation process. They have inherent hunting and fishing Rights. Was it wise not to reach out to them directly?

Correspondence has been forwarded to First Nations outlining the project and inviting them to participate.

3) Within the June Background Report *3.4 "Creation of Additional Dwelling Unit Provisions"* there is a conflict between Provincial Policy permitting 3 dwelling units and the Municipality's Official Plan permitting only 2 ADU's in any Zone that permits year-round residential development.. *but more importantly are the Municipality's first two bullet points excluding lots that:*

Firstly - *Have frontage on a water body* That is understandable for RW & W.REC zoned lots that are small in size, where minimum Zone Requirements can't be met. However, the KiCKER IS; there are large size properties that have frontage on water bodies. Then applying that same restriction becomes totally unreasonable and should be modified accordingly to allow Additional Dwelling Units on large properties. I for example have 70+ Acres of land at 43 Walker Lane it has frontage on Lake Huron. It has been a family holding for 70+ years.

The revised draft continues to not permit ARU's (more than one dwelling unit per lot) in RW and W.REC zones, but permits them in other zones, such as the Rural Zone, regardless of whether the lot is on the water or not. Your property at 43 Walker Lane is zoned Rural (R), however the frontage issue remains.

Secondly -*Do not benefit from frontage on a Municipally owned and year-round maintained road* As written that is an unreasonable restriction; many properties have Legal Easements to access the Municipality's Roads from their property. This should be modified accordingly to allow ADUs. Important, keep in mind Municipal Roads meander around and were not neatly constructed on Lot and Concession Lines forcing landlocked properties to secure Perpetual Legal Easements.to Municipal Roads.

Another good discussion point! – The theory is that even with legal access, additional development on private roads leads to additional pressure to assume and/or upgrade and/or maintain the road, which is not feasible, especially given the rural development densities.

4) *Section 3 Definitions* . should include Huron Shores Flood Assessment (H366743 Report and used as a ready reference to ensure historic and potential flood areas are addressed in all Zoning Applications.

This is handled through Draft Section 4.11 and discussions are ongoing to maintain current 'non-mapped' approach which allows for future flexibility should additional mapping be undertaken, or to apply the 'environmental management' zone to all flood prone areas, which adds prominence to this important matter.

5) The MTO and the Railway have Control Corridors adjacent to their Right-of- Ways. Please elaborate on how that affects land developments

Buffers for visual, noise abatement and safety should also be addressed in the New Draft.

This is addressed in the Official Plan

7 APPENDIX C - Correspondence and Responses – Jason Naccarato – Owner 21 Phillips Bay Road

October 30, 2025

Hi Peter,

Thank you for your response and for outlining the next steps in the process.

Yes, I would like my correspondence dated September 10 to be included in the materials presented to Council on December 10. I believe it is both clear and evident that a significant error occurred during the original zoning process in 2018, and I feel it's important that this be properly documented in the public record.

I would also appreciate being included on the email contact list so I can receive all further updates related to this project.

As we've discussed previously, our operations at Phillips Bay Resort are well known to municipal staff. However, I remain concerned that if this zoning issue is not corrected, it could create unnecessary complications for us over time. I believe a further discussion with you would be a worthwhile use of our time, and I'd be happy to arrange that at your convenience.

Thanks again for your time and consideration.

October 29, 2025

Hello Jason,

Thanks for taking the time to submit comments on the draft zoning by-law. After much thought, and as per my comments below, I don't believe it would be appropriate to change the current zoning on Phillips Bay Resort. I am however certainly happy to discuss a rezoning should you wish to make an application.

-----Original Message-----
From: Jason Naccarato <[redacted]
Sent: Wednesday, September 10, 2025 6:32 PM
To: Amber Shannon <Amber@huronshores.ca>
Cc: email <email@huronshores.ca>
Subject: Huron Shores Comprehensive Zoning By-law #18-18 Review

Hello Amber,

I am writing as the owner of 21 Phillips Bay Road to request a zoning revision on a portion of the property. The lands are presently split-zoned R, RC (Recreational Commercial), and W.REC (Waterfront Recreational). I am requesting that the W.REC portion be re-zoned to RC to align with the historic and ongoing commercial use of the site.

Background & Rationale
Longstanding commercial resort use. The property has operated commercially for decades?originally as Bill Phillips' Camp and, since 2016, as Phillips Bay Resort?serving visitors to Big Basswood Lake. Public sources note resort operations beginning in 1910 and continuing through to today.

Historic RC character of the waterfront area.
My understanding is that during a prior zoning review the W.REC segment was created by splitting area that had historically functioned with RC-type activities (lodging, marina/recreation, tourist-serving uses, Capground).

Commercial activities on W.REC lands. Since 1910, the areas now zoned W.REC have been used for a range of commercial activities, including a marina, boat repairs, service garage, and boat motor sales. Buildings associated with these activities remain on site today. Commercial operations have therefore been ongoing in this part of the property for over a century. This request would bring the zoning into alignment with the property's actual and historic use, and more accurately represent the true case.

Zoning intent and conformity.
The RC ? Recreational Commercial zone expressly permits uses typical of a resort operation?campground, marina, outdoor recreational facilities, tourist establishment/outfitter, restaurant, and related accessory uses.

The W.REC ? Waterfront Recreational zone is oriented to recreational dwellings and park/playground use, which is more restrictive and does not reflect the historical commercial waterfront uses of this site.

Active by-law review window. The Municipality is presently undertaking a comprehensive review of Zoning By-law No. 18-18, making this an appropriate juncture to correct the mapping to reflect long-standing resort use.

Request
That the Waterfront Recreational (W.REC) portion of 21 Phillips Bay Road be re-zoned to Recreational Commercial (RC) so that the entire resort waterfront area functions under a single, appropriate commercial recreation designation consistent with the site's historical and current use.

Supporting Points
Aligns zoning with over a century of commercial resort activity, including marina, boat repair, service garage, and boat motor sales.

Ensures conformity between permitted uses (marina, tourist establishment, campground, accessory retail) and actual/anticipated operations at the resort.

Provides clarity for permitting and compliance, reducing the need for repetitive site-specific variances where RC uses extend into the current W.REC polygon.

Coordinates with the Comprehensive Zoning By-law review now underway.

Next Steps
I would appreciate:
Pre-consultation with Planning to confirm next steps

I can provide a property sketch showing the existing R/RC/W.REC boundaries, the requested W.REC → RC area, and notes on existing resort features along the shoreline. Please let me know any preferred mapping formats.

Thank you for your consideration. I look forward to working with you (and Peter) to align the zoning with the property's long-standing commercial resort use.

Sincerely,
Jason Naccarato
Owner, 21 Phillips Bay Road

From: PETER TONAZZO <p.tonazzo@shaw.ca>
Sent: Friday, September 12, 2025 1:09 PM
To: Jason Naccarato <[redacted]>
Cc: Amber Burgler <Amber@huronshores.ca>
Subject: Re: Huron Shores Comprehensive Zoning By-law #18-18 Review

Hi Jason,

Happy to discuss this further. I don't necessarily disagree with what you are saying, but I'm not sure I'm comfortable bundling this in as part of the comprehensive zoning by-law project. I think given the nature of the amendment, it would benefit from the circulation and transparency afforded by a site-specific notification and rezoning application, not to mention any additional studies that may be warranted. Again, that is not to say your proposal doesn't have merit, I just think it should go through a site-specific rezoning process.

Regards,

Peter.

8 APPENDIX D - Pro Forma Letter and Responses

To: Amber Shannon
Deputy Clerk (amber@huronshores.ca)
Municipality of Huron Shores
7 Bridge St., P.O. Box 460
Iron Bridge, ON P0R 1H0

And to: Peter Tonazzo
Planning Consultant (p.tonazzo@shaw.ca)
c/o Municipality of Huron Shores
7 Bridge St., P.O. Box 460
Iron Bridge, ON P0R 1H0

From:
Chris and Stephanie Abbott
Gabe and Patti Stefanizzi
Kevin Punch
Joan and Albert Punch
Rhonda and Thomas Kirby
Paul Lefave
Matthew and Adelina Schultz
Sabrina Wade
Tammy North

Dear Ms. Shannon and Mr. Tonazzo;

Thank you for the opportunity to comment on the draft Comprehensive Zoning Bylaw. This submission also includes our comments relating to the draft Official Plan that is also under review.

As a starting point, virtually all of the comments below relate to the Official Plan (OP).

As many of you are likely aware, a Draft OP has been prepared and was sent to the Province for preliminary comments a little over two years ago. The Province is the ultimate approval authority for an OP and preliminary comments have yet to be received back from the Province. Therefore, the OP project is still underway and these comments will be considered when a draft OP is brought back to Council in 2026. If approved, any alterations may necessitate amendments to the Zoning By-law, to be consistent with the OP as approved by the Municipality and Province. For those that wish to be on the Zoning By-law email stakeholders list, your email will be carried forward to be on the Official Plan Project stakeholders list, so that you can receive correspondence when that project continues.

It is also recognized that the following comments relate to the potential of a new pit/quarry locating in the Walker Lane/Road area. I can confirm that as of the writing of this response, the Municipality has

not been approached with regards to locating a pit/quarry in this area. Furthermore, I can confirm that the property in question is not zoned for a pit or quarry, therefore, Planning Act approvals are required.

As ratepayers of the Municipality of Huron Shores, we respectfully ask that the Huron Shores Mayor and Council take the following under consideration:

1. Ensure that the potential long-term economic, social and other contributions of land within the Huron Shores Waterfront Policy Areas is recognized and preserved.
   I generally agree and am of the opinion that the Draft OP appropriately balances long term economic and social considerations with protecting the character of existing areas and natural heritage features. Having said this, further discussion can certainly occur on this topic.

2. Ensure the adoption of a preventative approach to the protection of natural heritage features and areas, and ensure that such protection is a key element in any Planning Act decision, with a diligent focus on the protection of the natural environment for generations to come.
3. Continue to identify, preserve, protect and enhance the natural heritage features and areas of the Huron Shores watersheds and shorelines.
   I agree with both points above. For example, the total acreage of wetlands identified in the current Official Plan (OP) is about 9,000acres. In the draft OP, this has increased to about 14,000acres. The current OP recognizes one small wetland in the Walker Lane/Road area. The Draft OP mapping recognizes a considerable number of wetlands, including one on the potential pit/quarry property.

   As some are aware, natural heritage features are identified by the Province (MNRF) and provided to the Municipality through the Land Inventory Ontario (LIO) portal. We are aware that there appears to be some natural heritage features, such as fish spawning areas and bird nesting sites that were on the old OP mapping, but not on the new/draft OP mapping. We are working to determine why there is a discrepancy.

   Suffice to say, the potential pit in question is not zoned to permit a pit, therefore, a rezoning is required, as well as an Official Plan Amendment. As directed by current and draft OP policies, a complete Planning Act application to permit a pit/quarry, will include among other things, wetland evaluation(s), an investigation into whether there are endangered species, an archaeological assessment, hydrogeological study, land use compatibility study, etc. If Planning Act approvals can be secured, the proponent would also need to obtain a pit license under the Aggregate Resources Act, through the Ministry of Natural Resources and Forestry (MNRF). This too, is a fairly rigorous process.

   While I agree that protecting all natural heritage features is important (and required under the PPS and other applicable laws and regulations) I would be remiss not to note that the presence of wetlands, endangered species, and sensitive habitat such as bird nesting sites and fish spawning areas could also significantly impact all nearby development, including new lot creation (severances) or other small developments that may require Planning Act approvals. For example, if a cottager wishes to sever their property, the presence of these natural heritage

features could prohibit such severance or require significant, costly studies. The same could hold true for a minor variance application to reduce a setback to locate a garage or other building. When it comes to protecting natural heritage features, there isn't much flexibility with regards to the size or scope of the development, and the regulations generally apply equally to large and small development proposals, even though small development proponents cannot necessarily afford the time and resources to conducting these studies.

4. Recognize that the land use separations referred to in the Provincial Policy Statement are minimum separations, and ensure that incompatible land uses are separated to the maximum extend under the law.
   This can certainly be discussed as part of the Official Plan project; however, it is noted that these separations apply to both new noxious uses and new sensitive uses, and therefore, would have to be applied equally to both. The PPS currently affords aggregate deposits various protections, including not permitting encroachment of sensitive uses, which underscores the fact that increasing the separation between a new noxious use from existing sensitive uses, would also require the same increase for new sensitive uses in relation to existing noxious uses.

5. Ensure that the costs of significant infrastructure alterations required for the purposes of new non-residential developments are paid in advance by the developer to avoid such costs being passed on to the ratepayers of Huron Shores.
   I generally agree that large-scale developments should cover the costs of infrastructure alterations, which should not be borne by the ratepayers. Please see comments below under Development Charges.

6. Ensure that Huron Shores policies in relation to quarry development are formally reviewed, and that during such time as is required for such policy review, that an Interim Control Bylaw be put into place.
   Please see comments below under Interim Control By-law.

7. Other municipalities across the province have been faced with similar issues, and they have successfully adopted Official Plans providing for significantly greater separation of incompatible uses. With this in mind, we would ask that Huron Shores follow this example and ensure that the 2023 draft Huron Shores Official Plan be amended so as to prohibit any new Class 3 Industrial use, including new quarry developments, within 2 km of municipal lake shores.

This can certainly be discussed as part of the Draft OP project. As mentioned above, within the context of Huron Shores, I would argue that the draft OP puts forward a policy framework that appropriately balances development with protection. The Draft OP specifically recognizes seasonal cottaging and tourism as well as resource extraction and other 'employment uses' as being part of this framework.

Applying a broad policy prohibiting Class 3 industrial uses from locating within 2km of a municipal lake, including Lake Huron, would eliminate over 70% of the Municipality from having any Class 3 industrial development and render existing pits and other uses as legal non-conforming.
We request that Huron Shores Council put into place the following bylaws:

1. An Interim Control Bylaw in relation to any new quarry development, to enable study to be conducted to review land use and zoning controls with regard to quarries.
   Interim Control By-laws are generally used to temporarily (up to 2 years) freeze a particular type of development that is otherwise permitted in a zoning by-law. In this case, a pit/quarry in the Walker Lane/Road area is not permitted under the current and proposed Official Plans and Zoning By-laws. Furthermore, I am not seeing any signs of an impending surge for pits or quarries on lands where they are currently permitted. On this basis, I would not recommend an Interim Control By-law, but that would ultimately be a decision of Council.

2. Enact a Development Charge Bylaw in relation to any development that would require more than $10,000 in upgrades/alterations to municipal infrastructure, so as to ensure that other Huron Shores ratepayers do not bear the responsibility of such cost.
   The creation of a Development Charges (DC) By-law is complex, requiring significant studies to demonstrate that growth is anticipated and that this growth will generate a measurable need for new or expanded services. Actual development charges are prescribed based upon this measured growth, and may not actually be commensurate with the overall costs of such development. DC's are intended for high growth municipalities where there is a high volume of charges.

   Given the limited growth and relatively rare instance that large developments requiring more than $10,000 in upgrades/alterations occur, a more appropriate mechanism might be through the Municipal Act, where Municipalities can require large scale developments to pay for road upgrades and/or road maintenance, as well as other infrastructure upgrades, although within the context of Huron Shores, it is likely that roads would be the biggest issue. On a preliminary basis, it is likely that charges under a Municipal Act agreement can be tailored to individual projects, as opposed to a 'one size fits all' DC.

Please provide confirmation that you have received these comments.

Thank you for your consideration of this submission.