

**Subject:** Request from the developer for 75 Main Street in Bobcaygeon Plan 2025-032

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**Sent:** Tuesday, June 3, 2025 7:49 PM

**To:** Agenda Items <AgendaItems@kawarthalakes.ca>

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We wish to submit the following for inclusion in the agenda for

We respectfully request that the City remove clause 11.5.n(d) from the proposed zoning amendment, as recommended in the PAC report PLAN2025-032.

The clause currently reads:

“d. Where the zone designation on Schedule ‘D’ is followed by the holding symbol ‘(H)’, the lands are subject to the inclusion of at least 2 affordable housing units. Once the City has received confirmation that affordable housing will be included and registered on title, the holding symbol can be removed by amendment to this By-law.”

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## **Rationale for Removal**

### **1. Financing Constraints**

A holding provision creates significant barriers to securing construction financing, as lenders view such conditions as unresolved risks. Banks require certainty about development approvals before releasing funds. The (H) symbol’s dependency on future City confirmation introduces unnecessary uncertainty, which holds the potential to jeopardize the project financing and the project itself.

### **2. Status of Affordable Housing Discussions**

While the inclusion of affordable housing was discussed at the City’s suggestion and we had incorporated it into our planning somewhat, there has not been a formal agreement to provide affordable units as part of this application. We indicated that we would contact the necessary authorities and continue discussions in good faith. When we did so, we found that the details of such an agreement could not be fully worked out until at least draft site plan approval was in place. So, encoding this requirement into the zoning by-law at this stage is premature and therefore unfair. Furthermore, the site plan approval process provides the appropriate mechanism to address any mutually agreed-upon commitments through binding agreements, making the holding provision completely unnecessary.

### **3. Program Uncertainty**

The Kawartha Lakes’ affordable housing program is still evolving, with limited precedent and developing administrative processes. Imposing a holding provision based on requirements that are not yet fully established or tested risks procedural delays and adds regulatory uncertainty, which may discourage private sector participation.

### **4. Policy Alignment**

The project already aligns with key affordability and intensification policies under:

- **PPS 2024** (Sections 2.2, 2.3)
- **CKLOP** (Sections 5.3.5, 18.5.4)
- **Bobcaygeon Secondary Plan** (Section 31.3.2.4.2.1)

## **Conclusion**

We urge Council to approve the zoning by-law amendment without the Holding (H) provision. While we appreciate the City’s focus on affordable housing, introducing a statutory requirement at this stage—before draft approval and any formal agreement—creates unnecessary uncertainty and may hinder project financing and delivery. We remain committed to working collaboratively with City staff through the site plan approval process to ensure the project meets all applicable objectives.

Thank you for your consideration,

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