

# Notice of Appeal

(Pursuant to Section 28 of the *Planning Act*)

**TO:** The Island Regulatory and Appeals Commission  
National Bank Tower, Suite 501, 134 Kent Street  
P.O. Box 577, Charlottetown PE C1A 7L1  
Telephone: 902-892-3501 Toll free: 1-800-501-6268  
Fax: 902-566-4076 Website: www.irc.pe.ca

**NOTE:**  
Appeal process is a public process.

**TAKE NOTICE** that I/we hereby appeal the decision made by the Minister responsible for the administration of various development regulations of the **Planning Act** or the Municipal Council of \_\_\_\_\_ (name of City, Town or Community) on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, wherein the Minister/Community Council made a decision to \_\_\_\_\_

(attach a copy of the decision).

**AND FURTHER TAKE NOTICE** that, in accordance with the provisions of Section 28.(5) of the **Planning Act**, the grounds for this appeal are as follows: (use separate page(s) if necessary)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**AND FURTHER TAKE NOTICE** that, in accordance with the provisions of Section 28.(5) of the **Planning Act**, I/we seek the following relief: (use separate page(s) if necessary)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**EACH APPELLANT MUST COMPLETE THE FOLLOWING:** (print separate sheets as necessary)

Name(s) of Appellant(s): Charlie Hicken Signature(s) of Appellant(s): C Hicken  
Please Print  
Mailing Address: 1763 Rte 17 City/Town: Albion  
Province: PEI Postal Code: C0A1R0  
Email Address: charlieh748352@gmail.com Telephone: 838-2296

**Dated this** 20 day of March, 20205.  
day month year

## IMPORTANT

Under Section 28.(6) of the **Planning Act**, the Appellant must, within seven days of filing an appeal with the Commission serve a copy of the notice of appeal on the municipal council or the Minister as the case may be.

**Service of the Notice of Appeal is the responsibility of the Appellant**

Information on this Form is collected pursuant to the **Planning Act** and will be used by the Commission in processing this appeal. For additional information, contact the Commission at 902-892-3501 or by email at info@irc.pe.ca.

## Notice of Appeal of Decision of Three Rivers Town Council

### Schedule "A"

1. The 2018 Environmental Impact Assessment of May 2018 ("EIA") and all subsequent decisions based thereon, including the decision of the Town of Three Rivers of March 10, 2025, approving development application no. 14.25 DEP- 805 Brudenell Point Road ("March Town Council Decision"), are invalid because the public was not duly notified of the project and was unable to comment on it as required by s. 9 of the Environmental Impact Assessment Act.
  - a. the EIA was only presented by the project owner, Great Wisdom Buddhist Institute ("GWBI"), not by the Township of Brudenell as required by law;
  - b. the presentation was only held at a Community Open House held in ROMA in June of 2018 to which a limited group neighbors, not to the public as required by law, were invited;
  - c. the notice and information required by the above Act was not provided, and Brudenell officials were absent, denying the public at large the opportunity to comment; and
  - d. shortly thereafter, Brudenell was amalgamated into Three Rivers and no further public meetings about the project were held, denying all citizens in the new community the opportunity to learn and comment on the project.
2. Under s. 6.11.1 of Development Bylaw no. 2023-02 of the Town of Three Rivers (Development Bylaw"), the lands comprising the GWBI project are zoned as "Institutional Zone" and dormitory accommodations are not a permitted use in such zone. Thus, permission to construct dormitories no. 3 and no. 4 breaches the above bylaw.
3. The March Town Council Decision approving construction of dormitories no. 3 and no. 4 represents a material change from the permitted use of an Institutional Zone and required a zoning amendment application and a duly constituted public hearing, with due opportunity for the public to make representations as set out in s. 3.6 and s. 3.8 of the above Development Bylaw, none of which was provided.
4. The March Town Council Decision de facto approves a fundamental departure from the master plan on which the EIA was based, including without limitation:
  - a. the construction of one additional dormitory building not disclosed in the EIA materials;

- b. completely different layout of the entire complex, replacing two clusters of low rise housing with garden courtyards and a central temple, with L-shaped row-housing complex with a large central building, none of which was shown in the EIA.
5. The March Town Council Decision failed to provide assurance that the capacity limits set out in the EIA, being 1,400 persons and maximum of 200,000 square feet of built-up space, will not be breached by construction of dormitories no. 3 and one additional dormitory, no. 4, not set out in the master plan.
6. The Town Council further failed to consider in its March Town Council decision that GWBI constructed on site at least two very large outbuildings, which should be counted as a part of the 200,000 square feet limit on which the EIA was based.
7. In issuing the March Town Council Decision, the Town Council failed to address breaches of commitments made in the EIA supporting materials and important changes occurring in Three Rivers due to rapid development, including:
  - a. public spaces and walking trails were not established as promised;
  - b. despite commitments to procure building materials and supplies locally, much of the material and supplies came from Asia in containers, depriving local businesses of sales and raising questions of compliance with Canadian Safety Certification standards;
  - c. transportation studies are outdated and electrical demand was not addressed in the EIA and needs to be revisited due to current shortages;
  - d. the promise of “religious tourism” has not materialized.
8. The physical size of the GWBI facilities and its eventual population of 1,400 persons, which makes it almost as large as Montague, with three times the revenue of Three Rivers and five times the assets, is having a material socio-economic impact on the community. It is not acceptable for this project to have been launched in 2018 with only a limited number of citizens of Brudenell being informed and none of the wider Three Rivers community having been informed of the plan in an open and transparent manner, with an opportunity for a dialogue, most importantly for yet more major changes being made to the plans without public meetings and for GWBI not being held to the promises made in the EIA materials.



Communities, Land and Environment

# Application for an Environmental Impact Assessment

(Pursuant to Section 9(1) of the *Environmental Protection Act*)

Personal information on this form is collected under Section 31(c) of the *Freedom of Information and Protection of Privacy Act* R.S.P.E.I. 1988, c. F-15.01 as it relates directly to and is necessary for evaluating applications for an Environmental Impact Assessment. If you have any questions about this collection of personal information, you may contact the coordinator, Environmental Assessment Section, Prince Edward Island Department of Communities, Land and Environment, (902) 368-5474.

**This form allows the proponent to provide a general summary of the proposed project so that the Environmental Assessment Section can determine whether it is an undertaking. All sections must be completed. If the project is determined to be an undertaking, the proponent will be required to provide an Environmental Impact Statement.**

Proponent Information		
Name (if corporation, please specify): Great Wisdom Buddhist Institute (GWBI)		
Mailing Address: 46 E Uigg Road, Vernon Bridge, PEI		
		Postal Code: C0A 2E0
Tel (w): 902-461-2525	Tel (h): NA	Fax: NA
E-mail: rob@ekistics.net		
Principal Contact Person (if applicable): Rob LeBlanc		
Official Title: President of Ekistics Plan + Design		
Tel (w): 902-461-2525 ext 102	Tel (h): cell (902) 483-2424	Fax: NA

Project Information
Description: <u>GWBI is planning to construct a monastery facility on their property on the Brudenell Point Road in Kings County PEI.</u> <u>The facility will operate much like an academic institution with teaching facilities, lecture halls, worship areas,</u> <u>dormitories, eating area, maintenance facility, offices, and some recreation facilities. The buildings will have an area</u> <u>of about 200,000 sq.ft. upon buildout and with a capacity of 1,400 persons. The site around the facility will include</u> <u>agricultural fields, trails, stormwater ponds, parks and gardens, and a parking area for tourists and visitors for about</u> <u>300 cars when fully built-out. A careful environmental planning strategy has been established to guide development</u> <u>in an ecological way.</u>

Location		
Property Tax No.: 1026288	Community: Brudenell	
County: Kings	Road Name or Route No.: Brudenell Point Road, Rt 319	Civic Address No:

**\*Attach an appropriate scale property map indicating the site location.**

**Related Documents**

Provide a list of supporting documents provided with this application and/or indicate documents to be provided later):

The Monastery Master Plan is a comprehensive document that outlines all aspects of this project including the mitigative measures proposed to minimize environmental risks.

**Funding**

List government agency(s) where funds are being requested:

NA

**Estimated Project Cost**

What is the estimated final cost of the project? (not including land costs):

**Application Fee**

Application fee amount based on the estimated project cost and the following fee structure: \$

	Fee Structure	
	Cost of Project	Fee
	Under \$200,000	\$100
	\$200,000 to \$999,999	\$500
	\$1,000,000 to \$2,499,999	\$2,500
	\$2,500,000 and over	\$10,000

**Signature**

May 22, 2018

Date



Signature of Proponent

**Return the completed application form, along with the application fee, to:**

Environmental Assessment Coordinator  
Environmental Impact Assessment Section  
Department of Communities, Land and Environment  
PO Box 2000  
Charlottetown, PE C1A 7N8

Make cheques payable to the Minister of Finance.

**Please Note: Your application will not be processed until the application fee is received.**

For assistance with this form, please call the Environmental Impact Assessment Section at 368-5474 or visit our office (4<sup>th</sup> floor, Jones Building, 11 Kent Street, Charlottetown).