

Paul Reale

[REDACTED]

Town of the Blue Mountains  
32 Mill Street, P.O. Box 310  
Thornbury, ON N0H 2P0  
April 24th, 2024

**RE: PDS.24.075 Recommendation Report – Zoning By-Law Amendment and Plan of Subdivision Subdivision for Part Lots 35 and 36, Concession 10 (Lora Greens)**

**Deputation Request, April 30th Committee of the Whole**

Dear Madame Chair and Councillors,

I am compelled to write to you once again due to serious and unresolved issues surrounding the proposed Lora Greens development, specifically regarding the significant traffic concerns at the intersection of Grey Road 113/10th Line and Highway 26. This intersection has been repeatedly flagged in the Town of the Blue Mountains' Transportation Master Plan as critically unsafe and in immediate need of substantial upgrades. Despite this, the recent recommendation report for Lora Greens has not aligned with our community's safety needs and the strategic visions outlined in our town's planning documents.

This deputation aims to address the following key points:

- 1. Contradictions between the developer's Traffic Impact Study (TIS) and the Town of the Blue Mountains Transportation Master Plan (TMP)**
- 2. Concerns over the methodology of the developer-conducted TIS**
- 3. The lack of consideration for the Thornbury-Clarksburg bypass**

These issues not only undermine the integrity of our municipal planning efforts, but also pose a direct risk to the safety and quality of life of our residents and commuters. I urge the council to take immediate action to address these discrepancies and to prioritize the development of a comprehensive approach that ensures the long-term safety and sustainability of our community.

## **1. Stark Discrepancies Between Traffic Impact Studies and the Town of the Blue Mountains Transportation Master Plan:**

Town staff prioritize a developer's Traffic Impact Study (TIS) that supports the proposed development, yet directly contradicts the broader visions and safety recommendations of the Town of the Blue Mountains Transportation Master Plan (TMP).

The TIS conducted by the developer suggests that no significant upgrades are required to the intersection of Grey Road 113/10th Line and Highway 26 until 2031 (Section 6.2). This stands in stark contrast to the TMP, which identifies immediate needs for traffic control measures at this intersection to mitigate known safety risks. Our town's TMP identifies this intersection as a serious concern with a history of speed related collisions and a motorcyclist/cyclist fatality in April 2022 and recommends improvement to addressing these existing concerns by proposing traffic signals or a roundabout (Section 8.5.1).

I find it disconcerting that Town staff make no mention of our town's TMP findings in their recommendation report for the proposed development project. Instead, they defer to the findings of a developer's TIS (a study that neither requested public input nor received the endorsement of our Town Council) for required and recommended improvements to the intersection of Grey Road 113/10th Line and Highway 26.

The recommendation report states that the Ministry of Transportation (MTO) has reviewed the TIS, but it is not clear that Town staff have presented the contrasting conclusions of the TMP to the MTO, thus prompting the question: Have Town staff asked the MTO to review the findings of our town's TMP concerning the intersection in question and juxtapose it with the developer's TIS? Both studies were produced in 2022 and warrant the attention of the MTO.

## **2. Faulty Methodology Used in the TIS:**

This discrepancy raises concerns about the reliability and thoroughness of the developer's TIS. It is crucial that such studies are conducted openly, with methodologies that are accessible and verifiable by independent reviewers, especially when they significantly impact public safety and community planning.

From an initial review of the data, the TIS suffers from many significant flaws that throw its findings into question.

First, the TIS conducted on the behalf of the developer relies heavily on projected data that is no longer valid. The TIS makes use of a 2% rate increase per annum for traffic to calculate its projections (Section 3.2.1). This number is based on the MTO's *Highway 26 Transportation Study* conducted in 2015, which projected the 2% increase for our area, a study that is already 9 years old and was calculated before COVID-19 and the current population explosion we're experiencing in the Town of the Blue Mountains. The TIS

maintains that based on the 2% rate of increase the intersection of Grey Road 113/10th Line and Highway 26 will be fine until 2031 according to existing conditions, at which point traffic lights will solve all future problems and no further improvements will be needed (Section 6.2). Furthermore, the TIS also points out that its traffic counts have not considered COVID-19 implications (Section 2.2.2).

In the Town of the Blue Mountains Transportation Policies Background Paper (2023), which provides recommendations for the Town's Official Plan, the study used a 3% rate increase per annum in traffic for its study, which they admitted was a "slightly conservative annual growth rate" (Section 4.2). In short, we do not have the proper data to make traffic projections about the intersection of Grey Road 113/10<sup>th</sup> Line and Highway 26. Town staff need to follow the recommendations of its TMP and "engage and encourage MTO to revisit and update their 2015 study to reflect regional traffic changes and newer data availability" (Section 4.2).

Also, the TIS does not accurately account for the projected traffic caused at the intersection of Grey Road 113/10th Line and Highway 26 by the future development of the Campus of Care. In the TIS, the Campus of Care development is listed as a 160 long-term facility and calculates the trip generation using the assisted living land use from the *ITE Trip Generation Manual 11<sup>th</sup> Edition* (Section 3.2.2). Since the TIS report was published in 2022, the Campus of Care development has increased significantly in size and scope and now includes: a long-term care facility, labour force housing, retirement homes, and attainable housing for a combined total of 552 units. Moreover, the Campus of Care is to include commercial spaces and a daycare facility. As it currently stands, the traffic impact of the Campus of Care development falls well outside the scope of the TIS. New traffic impact studies are required in order to anticipate massive numbers living in and accessing this facility.

### **3. Overlooked Significant Factors: The Thornbury-Clarksburg Bypass**

It is also concerning that neither the Town's recommendation nor the developer's TIS take into account the planned Thornbury-Clarksburg bypass, which could significantly alter traffic patterns and loads at the intersection in question.

The MTO's future needs study for Highway 26 designated the intersection of Grey Road 113/10th Line and Highway 26 as one of the main arteries for the future Thornbury-Clarksburg bypass. The Town's official plans cites this intersection as a "Community Gateway" and endorses it as the future artery for the Thornbury-Clarksburg bypass.

The idea of the Thornbury-Clarksburg bypass has also been endorsed in the Town's TMP, which recommends MTO to proceed with their future Transportation Class EA for both the

Thornbury bypass and widening of Highway 26 and alternate route consideration, as set out in their 2015 Study.

### **Conclusion**

Given these issues, I urge the council to re-evaluate the reliance on the developer's TIS and consider a more integrated, transparent approach to traffic planning that aligns with the Town's Official Plan, the TMP and the broader interests of the community. It is imperative that we prioritize public safety and the integrity of our planning processes to ensure sustainable and safe development in The Town of the Blue Mountains.

I respectfully ask Council to request additional information, such as a future staff report, for the intersection of Grey Road 113/10<sup>th</sup> Line and Highway 26.

Recently, in Grey Highlands, neighbouring residents complained to Grey Highlands Council about the dangerous intersection at the Holland/Euphrasia Townline and Sideroad 22 A. Their council voted in favour of a full staff report with information and data about the intersection from the OPP be prepared for council's consideration. We've already seen a fatality at the intersection of Grey Road 113/10th Line and Highway 26. Let's not continue to be bystanders and wait until the next fatal accident to finally act.

Sincerely yours,

Paul Reale