



February 4, 2025

Honorable Mayor and Members of Council,  
Town of The Blue Mountains  
32 Mill Street  
Thornbury, ON, L9Y 1T3

Dear Mayor Matrosovs and Council Members,

**Re: Deputation to the Town of the Blue Mountains Committee of the Whole Regarding the Proposed TOBM Official Plan (Staff Report PBS.25.004)**

We request that the Council adopt the following recommendations by staff:

1. **Affordable Housing –**

**We respectfully request that the Council endorse Option 3.** This Option “encourages” provision of affordable housing units and as noted by Staff, it “still sets the Town’s aspiration for development of affordable housing units”.

Staff recommends **Option 1**. However, in doing so, they acknowledge, "there is no legislative authority for the Town to require the provision of affordable units" and that for a development to proceed with the recommended Option 1, "a new development would need to justify why they are not providing affordable housing units." The clear implication in the Staff commentary is that if an application does not demonstrate provisions addressing affordable housing needs, such an application may be deemed not to comply with the Official Plan.

Quite simply, Option 1 requires development to provide affordable housing unless they justify, in the opinion of the Town, that they cannot. By their own admission, the Town knows they do not have this statutory authority. This begs the question why such a policy approach is being considered.

In the alternative, we request that the Town obtain a legal opinion prior to moving forward with approving Staff's Preferred Option 1.

## 2. Density –

We respectfully request that the Council endorse **Option 2**. This Option increases the maximum permitted density to 12 up/gha, no minimum density and retains the 40% open space requirement.

Staff recommends Option 1, which sets a minimum density of 10 units/ha to a maximum of 15 units/ha.

We do NOT believe Option 1 is a "gentle" increase as Staff stated. Lora Bay is approximately 219 ha. If the staff-recommended option is enacted, the Official Plan would require Lora Bay to build a minimum of 2,190 to a maximum of 3,285 homes.

The OMB approvals and MDA currently require about 1,200 units. About 375 are currently built. This dramatic increase in density is not consistent with the plans for the future Lora Bay lands presented to the community and is not at all consistent with the fundamental purpose and function of the Recreational Residential land use designation. The proposed density approach in Option 1 represents a very significant departure in housing form, community design and key assumptions in planning for water and sewer services.

Finally, the 2021 Census indicates that there are 7,396 total dwellings in the TOBM. We question how a policy approach that can put 40% of all houses in TOBM in Lora Bay can be put forward as a "gentle" increase.

## 3. Final Official Plan

The motion in front of Council is to approve direction and approve the Official Plan in the absence of the actual final Official Plan. We are uncertain if this is proper process under Section 17(22) of the Planning Act. Nonetheless, for clarity the Committee should provide staff direction they are seeking and require the final Official Plan be received at a future Committee Meeting.

We thank you for your time in considering our requests.

Kenneth Hale

Vice President, Land Development