

TO: Planning Director and Staff, Town of the Blue Mountains
Acting CAO, Town of the Blue Mountains

CC: Council, Town of the Blue Mountains

From: Pamela Spence, Craigleith

RE: COW Meeting February 4, 2025 – Re: OPR Report PBS.25.004
Follow-up Comments and Suggestions

Thank you to the staff for the additional work on and further explanations of some key factors in the Official Plan provided in report PBS.25.004. I was away for the February 4 meeting but have listened to the video recording.

Discussions at COW about these key policies in our settlement areas are critical to creating livable communities.

My suggestions for the draft Official Plan changes are summarized here and based on the rationale that follows.

Summary

- “Community Benefit” must be clearly defined, reference all 5 housing needs listed in the gap analysis and this list should align with all other policies of the Town including the Water/Wastewater Allocation By-law.
- All proponents (new projects or subsequent phases) should explain “**how**” they will provide a community benefit (not why) and whether that benefit is a housing solution from TBM’s list or a realistic offsetting amount.
- Clarity and mapping is needed for where 4 stories will be accepted **and** if housing must be a part of the 4 storeys approved (otherwise it could be all commercial).
- 10u/ha in the Residential/Recreational Land use designation has generated projects with a mix of housing types and a range of prices so 10u/ha should not be changed.
- Land must be clearly stated as the goal of the parkland dedication policy and, if not provided, then all three tests must be applied and failed in order to accept money-in-lieu.
- New Georgian Trail crossings must come under the test of “**why**” they can not be relocated elsewhere with interaction and restoration solutions included.
- Tree Preservation policies must be endorsed.
- School planning must start now.

Housing

Firstly, the November 2023 Housing Needs Assessment Study identified 5 housing gaps and TBM needed -

- affordable housing units
- purpose-built rental housing,
- smaller units (1 or 2 bedroom),
- seniors housing & long-term care facilities and
- workforce housing.

All these housing types should be on the **community benefit** list of desirables.

Construction innovations are desirable and should also be encouraged including:

- modular housing,
- tiny homes,
- innovative prefabrication techniques etc.

All these should be listed as **community benefits**. This term should be fully defined and used consistently between documents and strategies.

All proposals that provide **community benefits** should be encouraged. For example, proposing seniors' units should not require justifying why affordable units are not provided.

ARUs in single family homes are one answer for rental housing stock but only if the owner agrees to rent. How will this be enforced and tracked by whom?

ARUs do not truly help renters build wealth in the housing sector. ARU's are ranked lower in the Water Wastewater Allocation By-law (WWAB) and should be in the OP as well.

A proposal not providing **community benefits** also conflicts with the WWAB. When the WWAB is approved, this by-law will rank **community benefits** and then prioritize infrastructure allocation. So, projects being approved under OP policies should be in line with the WWAB -the next step in the approvals process.

I suggest that the intent of a housing policy should **not** be to justify "**why**" but "**how**" developers are providing **any** of the housing mix that is desired by the Town, what the market pricing will be and how long it is secured for and how. It should be in a form that this info can be incorporated into the development agreement so that the benefits endure.

Why, on page 3, is the target for 30% of new or conversion be affordable when 40% was identified in the Needs Study as the target?

Increased densities does not provide for smaller unit sizes (per page 3). Zoning would be a better tool.

Policy should require that, if not providing housing that fills a gap, proponents should **justify why they are not** and what they propose to do to **offset** this deficiency.

This then begs the question as to what staff and Council would accept as 'justifiable reasons' for a proponent not to fill the housing gaps.

Money – in – lieu of providing **community benefits** should be the alternative of last resort. Any offsetting payments to be made should not be a token amount - they should be realistic. Evaluating an offsetting amount could be as easy as a formula – current per foot construction cost of the proposed development (as per the building permit value) or average construction cost in the region for a residential home (ie \$250/square foot) X size of a two bedroom affordable unit (ie. 750 sq. ft.) = offsetting amount (\$250.00 x 750 = \$187,500). Money or useable land of that value could be acceptable offsets.

I agree with Mr. Postma - all developments, including phases of existing draft approved projects, must work in current market conditions and must demonstrate that they will provide some housing to fill the Town gaps or provide offsets. (Past decisions are not predictors of current conditions.)

Height

The recommended option of 4 storeys on the Thornbury Highway 26 corridor is confusing. Firstly there is no land use designation "Highway 26 corridor" in the OP. The linear boundaries vocalized on Feb 4 but not written into the OP offered east to west limits but no depth (south or north). Clarity on length and depth is needed – ideally mapped.

Secondly, "Highway 26 corridor" seems to align with land use designation "Downtown Area" but the policies of that Land Use designation don't align with the stated goals of providing residential. Housing is not a priority in the Downtown Area policies, rather, the intent (per pages 73 – 75, November 2024 Tracked Changes) is to:

- maintain and promote Downtown Thornbury and Downtown Clarksburg as the focal points for commerce in the Town, for residents, businesses and the traveling public;
- encourage the development of a mix of uses, including residential units in mixed use buildings,
- to enhance the character of the Downtowns and provide for a range of amenities and services within proximity to residences for daily needs

There are 16 other uses permitted on the list before residential uses. They're described as:

q) residential uses as part of a mixed-use building subject to Section B3.3.5.2;

r) residential uses as part of a multiple unit apartment subject to Section B3.3.5.2;

These policies do not require 4 storeys of residential or that residential even be part of mixed use. As a result **a four-storey building could be totally commercial!**

The preferred option reads that the 5th storey could be justified if it was a “community benefit” of any kind (whole storey or partial?). This reinforces the need to define clearly “community benefit” Council has the ultimate approval if the benefit is sufficient, but a clear “needs” list signals developers that Council approval is based on the adequacy of the benefit not a surprise.

Finally, the term “mixed use” is often used and encouraged but not defined. Do daycare and office suffice as mixed uses?

The foregoing is essential to clarify so that extra height is not sought by others outside Thornbury.

Density

Historically I have expressed concerns about projects in Craigleith not adhering to OP policies, however, I can commend these projects for providing a mix of housing that the Town knew it needed and that the builders could sell. New Craigleith projects will eventually be providing townhouses, row houses, semi-detached and back-to-back townhouses as well as single-family thereby offering a range of house types and prices.

The new Craigleith developments are generally achieved within the 10u per ha density limit as per residential recreation (RR) land use designation in the TBM 2016 OP.

A minimum is not necessary but, more importantly, a 50% density increase **is not necessary**. A truly “gentle” increase would be 20% same as in Community Living or 12 u/ha also preferred by the GBDI. However **status quo of 10u/ha is workable and ideal**.

Parkland Dedication

If land designated for parkland is preferred, then this should be stated in the OP. Furthermore when accepting monies-in-lieu, ~~all three tests~~ should be met to “**justify**” not providing land. I suggest the “**or**” be removed after the “and” in the second criteria.

Georgian Trail Crossings

I fully support the discussion and intentions of this section. There is an opportunity to improve by requiring a builder to provide an analysis similar to that required for housing.

I suggest the proponent must **justify “why”** crossings are needed and **why** they cannot be relocated elsewhere. There should be a requirement to demonstrate how they are going to mitigate interaction with and destruction to the trail along with restoration plans.

Tree Protection

As a supporter of the Tree Protection By-law from the POV that mature trees outlive property owners, I strongly endorse the policies being proposed. I also believe that any application for a land use change should include an inventory of mature trees affected by that land use change. If relevant there should be a reasonable, responsible plan to replace what is removed. There should be no “money grab” associated.

Experience shows that vegetation preservation plans need to be overlaid on site plans for exact information. Trees preserved on landscape plans have been cut to make room for infrastructure such as roads or stormwater ponds.

Expenses

Finally, I thank Council and staff for the money, time and effort expended in this Official Plan review. The residents who volunteered their time to attend the community workshops were significant and felt heard. Those workshops were important tools to increase information sharing and produced rewarding results. Addressing concerns in Phase 2 has led to better results leading to a better community.

Finally, on Feb 4th, Councillor Maxwell touched on schools and other services needed in our settlement areas. I was reminded of the Blue Water School Board comments outlined on the public meeting comment matrix where they requested “sufficient school capacity and land allocation for schools”. I do not see that the concerns of the School Board , a critical community service, have been addressed in the current draft of the OP. Changes in the OP to address additional population growth and greater densities require more school options. I believe that waiting 5+ years to start planning for schools, then another 3+ years for policies to be approved and then 5+ years for build-out means a school would be 10-12 years from now – this is not an ideal timeline.

I hope you will consider these comments when you reflect on changes to the Official Plan.

Thank you

Pamela Spence

March 4, 2025