

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



GEORGIAN TRIANGLE DEVELOPMENT INSTITUTE

Dear Mayor Matrosovs and Council Members,

**Subject: Allocation Policy from Committee of the Whole: Operations, Planning and Development Services Agenda – Tuesday September 17<sup>th</sup>, 2024**

Dear Council Members,

The GTDI is writing to express concerns regarding the proposed Allocation By-Law. This initiative marks a pioneering shift in Ontario, transforming what has traditionally been an Allocation Policy into a By-Law. Given its unprecedented nature, it is vital that we proceed with the utmost caution to ensure it sets a positive precedent.

We have reviewed the comparative examples cited by the consultant and staff, which include Collingwood, the City of Vaughan, the City of Brantford, and the Town of New Tecumseth. Notably, these examples appear to be all policies, not by-laws. The significance of this distinction lies in the fact that a By-Law establishes mandatory rules that the municipality must follow without room for discretion or flexibility in unique situations.

We are concerned that the by-law may withhold allocation from developments that comply with the Town's Official Plan, Zoning By-law, and have Draft Plan Approval, even in cases where there is no actual shortage of water or wastewater capacity.

The mechanism for granting allocation, as detailed in Section 7.B of the by-law, states: "Based on available ERU units set aside for allocation, those development applications scoring highest during the intake period review will receive allocation." In other words, allocation is assigned competitively, often rejecting development requests regardless of their point scores. This includes developments that conform to the Town's Official Plan, Zoning By-law, and have Draft Plan Approval, even when no shortage of water or wastewater capacity exists.

The GTDI believes that the recent amendments to the Municipal Act, encapsulated in the "Cutting Red Tape to Build More Homes Act (Bill 185)," were not intended to create a competitive scenario where projects that meet the Town's Official Plan, Zoning, and have Draft Plan Approval are denied allocation—particularly when there is no lack of water or wastewater servicing capacity.

We continue to seek additional time to collaborate meaningfully with staff and their consultants to address these structural issues at a minimum. During this period, we also aim to further discuss responses to our previous submissions and tackle new questions that have emerged as developers begin to align their projects with this by-law to earn points.

Given these concerns and considering this is the first instance of an Allocation By-Law being enacted under Bill 185, we strongly urge the Council to reconsider the structure and implications of the proposed By-Law. It is crucial that we address these issues thoroughly to avoid setting a problematic precedent and to prevent potential conflicts within our community.

Regards

Georgian Triangle Development Institute (GTDI)



September 25, 2024

Mayor Andrea Matrosovs and Members of Council  
The Town of the Blue Mountains  
32 Mill Street, Box 310  
Thornbury, ON  
NOH 2P0

RE: **Follow-up Request for Deferral**

**Allocation Policy as presented on the Committee of the Whole: Operations,  
Council Agenda**

**Monday, September 30, 2024**

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The Building Industry and Land Development Association (BILD) submits this letter as a follow-up to the Town of the Blue Mountains' draft Allocation Policy, which is scheduled for Council adoption on September 30th. On behalf of our members, we appreciate the opportunity to share our comments.

As outlined in our letter dated September 12th, BILD has been actively monitoring this issue in collaboration with the Georgian Triangle Development Institute (GTDI).

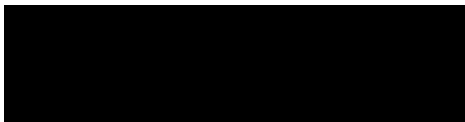
We were disappointed to see the policy approved at the September 17th Committee of the Whole meeting. In alignment with GTDI's concerns, BILD strongly supports their request for the Town to address the significant outstanding questions and issues surrounding this policy. In particular, BILD opposes any provisions linking allocation to conditions of approval related to affordable housing. Given the complexity of these matters, additional time is needed for thorough review and discussion.

**We therefore strongly recommend that Council to defer the adoption of this policy. Doing so would allow for continued dialogue and ensure the final version is well-considered before being implemented.**

As previously emphasized, it is essential for the Town to recognize that the current policy, as drafted, may unintentionally hinder efforts to address the recently declared housing crisis. The policy risks discouraging the creation of much-needed housing supply. BILD remains a committed partner to the Town and stands with GTDI in advocating for ongoing dialogue to refine the policy.

Thank you for the opportunity to provide feedback and for considering our request. We trust that our concerns, which align with the shared goal of increasing housing supply, will be recognized. Should you have any questions or require further information, please don't hesitate to contact the undersigned.

Kind regards,



Victoria Mortelliti, MCIP, RPP.  
Senior Manager, Policy & Advocacy



CC:

GTDI  
BILD MEMBERS

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*The Building Industry and Land Development Association is an advocacy and educational group representing the building, land development and professional renovation industry in the Greater Toronto Area. BILD is the largest home builders' association in Canada, and is affiliated with the Ontario Home Builders' Association and the Canadian Home Builders' Association. It's 1,300 member companies consists not only of direct industry participants but also of supporting companies such as financial and professional service organizations, trade contractors, as well as manufacturers and suppliers of home-related products.*