

February 29, 2024

To: Paula Hope, Member of Council
Adam Smith, Director, Planning & Development Services
Shawn Postma, Senior Policy Planner, Planning & Development Services
Town of the Blue Mountains

CC: David Riley, SGL Planning & Design

From: BMRA Planning Subcommittee

Re: Official Plan Review

Comments from the Blue Mountain Ratepayers Association on Phase 2 of the Official Plan Review are summarized below.

1. Growth Management

Ensuring that TBM's growth is sustainable is our most important planning challenge. The need to provide of full and sustainable services to all residents, to manage infrastructure constraints and costs, to protect our natural heritage, and to recognize the disproportionate role TBM plays in accommodating regional growth are fundamental considerations that establish a context for all OP policy updates.

The *Growth Allocations & Fiscal Impact Report* concludes that there is more than enough land available within TBM settlement areas to accommodate all development anticipated for the next 25 years. The number of units in our development approval pipeline (4,500) exceeds the total number of new units required over the next 25 years (3,590), according to the *Grey County Growth Management Strategy*. Further, TBM is making progress toward intensification and increased diversity of housing stock. The *Growth Allocations & Fiscal Impact Report* notes that "The shift to row and apartment units is already evident in the Town's development pipeline." The *Density and Height Background Paper* concludes that there are ample opportunities to continue and accelerate this trend, within the current height and density policy framework.

- The overriding goal of our OP update must be to manage and control growth to ensure environmental, economic, and community sustainability while maintaining quality of life for residents.
- No increases in building height or density should be considered except in very specific cases where the impact on growth management is minimal and the Town can secure important community benefits such as affordable housing.

2. Environment and Climate Change

TBM includes an exceptional combination of natural features that makes our municipality unique in Ontario. The protection and enhancement of our natural environment has been identified as a top priority repeatedly through numerous surveys, committees, public meetings and workshops over many years. It is essential not only for ecological sustainability and climate change mitigation/adaptation, but also for our local economy, health, and quality of life. There is an opportunity for TBM to demonstrate leadership in the implementation of strong, enforceable environmental policies.

The Environment and Climate Change Background Paper outlines important policy directions to be included in the OP, identifies policy recommendations from the TBM Future Story, and summarizes Policy Gaps, Opportunities and Recommendations. A wide range of important policy areas that require updates are identified and should be included in the updated OP. However, in several of these areas much more specific policy mandates, often with broader scope, will be required to achieve our environmental and climate change goals, and to address high-profile issues such as tree protection and surface water management. These enhanced policies include:

- Greater clarity on the management of groundwater quality; incorporating this principle within the broader context of strict protection of all water resources (see below re: OP Part C).
- Extending “preservation of forest cover” to include protection and enhancement of the trees and tree canopy in settlement areas (see below re: OP Section D8.2).
- Mandating ecologically sustainable natural buffers between the built environment and rivers, streams, wetlands, watersheds, and other natural assets; extending this to include prevention of sprawl and strict protection of all natural assets.
- Policies that support, as well as allow for, local food production.
- Policies that support active transportation options (see Section 9).
- Comprehensive intensification policies (see Section 4).
- Policies that support the development of complete communities (see Section 6).
- Incorporating relevant Transportation Master Plan and Drainage Master Plan recommendations.
- Enabling practical, cost-effective implementation of the policies listed above through tools such as Zoning, CPPS, Green Development Standards (GDS) and Community Design Guidelines.

Official Plan Amendment 3, developed as part of Phase 1 of the OPR and approved in principle by Council, includes language edits/additions designed to strengthen policies related to environment and climate change. These proposed changes focus primarily on Community Vision and Guiding Principles and Goals and Strategic Objectives and provide a useful starting point for Phase 2.

- Changes proposed in OPA 3 and related to environment and climate change should be reviewed and further strengthened/modified to reflect Phase 2 Background Papers and public engagement.

Additional changes to Sections of the 2016 OP not addressed by OPA 3 but required to update environment and climate change policies include:

- Section B5.2 Environmental and Open Space: This Section covers environmentally sensitive lands and natural assets (e.g., Natural Heritage Features, Wetlands, Hazard Lands), but lacks precision and specificity in several areas due to limited data and mapping. This will be addressed by the Natural Heritage Study (NHS) and Natural Asset Inventory (NAI). These important projects coincide with the OPR; findings and recommendations must be incorporated into policy updates.
- Part C Water, Environmental and Hazard Policies: Updates should include:
 - Incorporate findings from the NHS and NAI where relevant.
 - Strengthen policies to mandate stronger adherence to the 30-meter setback from watercourses and protect abutting local, non-invasive vegetation and trees on banks of watercourses, etc.
 - Improve development engineering standards to reduce the speed of runoff to and within watercourses, and sample/monitor water for quality and bedload.
 - Change the designation of stormwater ponds from Open Space to Hazard Lands with an emphasis on monitoring and maintenance specific to problems with sediment build-up.
 - Improve the direction, responsibility, and commitment to watershed planning.

- Section D8 Sustainable Development: Update to address environment and climate change priorities, including alignment with the TBM Future Story Recommendations and Bold Actions:
 - D8.1 Green Development Standards: Expand the current list of GDS topics to include efficient use of municipal infrastructure, reducing GHG emissions from buildings and transportation, complete communities, green space, and climate change resilience. Continue to take leadership in GDS, while coordinating with Grey County, the Province, and neighbouring municipalities.
 - D8.2 Tree Canopy: Update/expand this Section to reference available tools/resources such as the Tree Inventory and NAI. Develop stronger community tree protection policies. Ensure protection of mature trees in parks, open spaces and boulevards, and all Natural Heritage areas. Add policies to prevent clear-cutting of developable lands, to require tree canopy assessments as part of approvals processes, and to specify tree replacement requirements in cases where removal is required. Include policies to guide and enable a Tree Protection By-law applicable to TBM settlement areas.
 - D8.4 Energy Conservation and Efficiency Measures: Link this section to GDS (D8.1).
 - D8.5 Air Quality: Expand policies to encourage reduced vehicle idling times through measures that reduce congestion on Highway 26 and in settlement areas.

3. Housing Affordability

OP policies that support affordable/attainable housing are a top priority. The OP update should include policies that support greater housing stock diversity and apply available municipal tools to encourage or require affordable/attainable units.

- Encourage the development of a more diverse housing stock through gentle intensification (see Section 4) and potentially by increasing maximum building heights only in specified locations where Community Benefits such as affordable housing can be secured (see Section 5).
- The *Housing Needs Assessment* identifies a wide range of policy tools available to fill housing/affordability gaps. Top priorities from this list include:
 - Identify and incorporate an affordable housing target in the OP. Ideally, this target will align with the Grey County target of 30% of all housing – new construction or conversion.
 - Include policies that enable the Town to utilize incentive programs to support the construction of affordable housing units.
 - Leverage municipally owned lands to achieve housing goals.
 - Pre-zone sites suitable for affordable units.
 - Enable accessory dwelling units (ADUs) This should be extended to include a broad range of intensification measures that contribute to housing diversity (see Section 4).
 - Support the development of mixed-use buildings, particularly in Downtown Thornbury/Clarksburg and the Craigeith Village Centre.
 - Encourage the use of innovative building methods that enable cost savings that can be passed on to owners/renters. Extend this to include GDS that produce longer term economic benefits.
 - Give priority in the approvals process to developments that demonstrate that attainable/affordable units will be provided.
- Include policies that enable a water and sewage treatment capacity allocation bylaw (see Section 10). Include provision of affordable/attainable housing units as a top priority Community Benefit.

4. Intensification

BMRA supports gentle intensification through infill, ADUs, and building conversions. The *Thornbury Density and Intensification Study* describes multiple intensification opportunities within the current building height and density policy framework that can easily exceed Grey County intensification targets.

- Maintain the existing OP policies regarding minimum densities and maximum building heights across TBM, with potential exceptions granted only in designated locations where strict design criteria are satisfied and important community benefits are proposed/planned (see Section 5).
- Include separate lists of intensification criteria and greenfield criteria that apply across the entire Town, as recommended in the *Building Height Study*. Further clarification is required to distinguish intensification (i.e. in existing neighbourhoods) from greenfield (i.e. in undeveloped areas).
- The proposed criteria for greenfield areas are very general and mainly address how the new development connects to existing and proposed roads, trails, and parks. Historically, many greenfield sites have been adjacent or close to existing neighbourhoods, and many have prompted a strong reaction due to poor design. Criteria must also address the impact of greenfield development on neighbouring properties or public areas through the control of overshadowing, buffering, overlook, massing, grading, drainage, access and circulation, and privacy, as included in the proposed intensification criteria.
- Ensure that the lists of criteria applicable to both townhouse and apartment/mixed use subcategories are equally detailed and comprehensive, addressing the full range of parameters needed to ensure quality design compatible with community character.
- Consideration of lot coverage of adjacent housing (B.3.1.5.3.(e) in the 2016 OP) should be retained as a criterion to support compatibility with community character, and to ensure sufficient permeable area to prevent drainage issues, including impacts on neighbouring properties.

5. Building Height

Building height has been and will continue to be a controversial issue in TBM. This is predictable because:

1. Five or six storey buildings would represent a radical departure from traditional development particularly in Downtown Thornbury/Clarksburg or the Village Centre of Craigeith,
2. Increased height or density is not required to accommodate forecast growth in TBM (see Section 1)
3. Traffic congestion along Highway 26 is a major concern.

The only argument in support of increased building heights rests on the potential to directly address our need for affordable/attainable housing units.

- Maintain the maximum height limit of 3 storeys (11 metres) across TBM, except in the Blue Mountain Village Resort Area, where the maximum height limit is 5 storeys (16 metres).
- Policies that permit buildings of up to a maximum of 4 storeys should be considered, but only if the additional building height can be linked through clear, enforceable measures to a meaningful contribution to our affordable/attainable housing stock (e.g., minimum 30% of total units). The 4-storey maximum, with a step-back for the 4th storey, may offer a reasonable design option, based on the *Building Height Study* and work completed for the Gateway project.
- Provided that an enforceable requirement for affordable/attainable housing can be established, complete a detailed mapping exercise to identify specific areas/sites where 4-storey buildings may

be appropriate given comprehensive design criteria as described in the *Building Height Study*. These areas/sites should be focused along the Highway 26 corridor in Downtown Thornbury/Clarksburg and Craigeleith. Provide broad public engagement to ensure that residents have an opportunity to review and comment on proposed 4-storey building locations.

- Any areas acceptable for 4-storey buildings should be designated in the OP. Implementation must be site/project specific and governed by a ZBA or CPP By-law (see Section 12).
- Step backs above 3 storeys must be mandated for all buildings regardless their proximity to low-rise neighbourhoods. There must also be mandated setbacks from the road for taller buildings, and maximum building length and floor plate size.
- Ensure that all maximum height limits are always expressed in metres as well as number of storeys.
- All development proposals along the Highway 26 corridor must include effective measures for traffic management, active transportation and pedestrian/cyclist safety.
- Include all intensification/greenfield criteria that apply to any new development, and additional criteria that apply to 4-storey buildings (e.g., minimum lot depth, setbacks above the third story, setbacks from property lines, maximum building length, floor plate size, shadowing, transitions to low-rise buildings, etc.)
- Determine the appropriate density on a site-specific basis for any 4-storey building, based on built form and design criteria, as referenced in the *Density & Height Background Paper*.
- Updated Zoning Standards and Community Design Guidelines must be in place prior to any consideration of building heights greater than 3 storeys.

6. Complete Communities

The need for more complete communities is a major issue in TBM, particularly in and around Craigeleith and Blue Mountain Village. Very clear policy updates and land use designations are needed to ensure that opportunities to provide residents with key public and commercial services that are easily and safely accessible/walkable to our primary and secondary settlement areas are realized.

- Policies to support appropriate development of commercial and employment lands, and parks and open spaces (below) must play key roles in supporting complete communities.

7. Commercial and Employment Lands

Commercial services for Downtown Thornbury/Clarksburg and the Craigeleith Village Community are essential and must be supported through enforceable OP policies. Development of commercial uses is particularly important in Craigeleith, as part of creating a more complete community and reducing car travel to and from Thornbury and Collingwood. Current policies supporting commercial development as part of a mixed use Craigeleith Village Community (Section B3.12.2 of the 2016 OP) have not been implemented effectively in practice.

- The *Commercial and Employment Lands Background Paper* references policies in the 2016 OP that support effective commercial and employment development, as well as opportunities for improvement. The following additional improvements are recommended:
 - Updated *Community Design Guidelines*, including a focus on commercial and multi-use buildings in Downtown Thornbury and Clarksburg, and the Village Centre of Craigeleith, will be required to implement policies designed to maintain and enhance character. Policies and Guidelines should address a comprehensive range of design issues, including buffering and other measures to

ensure compatibility with neighbouring properties, parking restrictions to preserve public spaces and attractive streetscapes, building design, and landscaping.

- Include policies to support a range of commercial uses to serve the daily needs of residents and visitors. The needs of residents should be the first priority, within the context of creating complete, compact communities and opportunities for active transportation.
- Development of mixed use buildings within Downtown Thornbury/Clarksburg and the Craigeleith Village Centre should be encouraged to improve housing stock diversity.
- Policies that require residential buildings in commercial areas to have commercial uses on the ground floor should be revised. These policies should require commercial uses only at the ground floor facing the street and allow ground-related residential uses facing away from the street on properties with suitable depth.

8. Parks and Open Space

BMRA supports policy recommendations outlined in the *Parks and Open Space Background Paper*, with the following additions or modifications:

- Stormwater management ponds, now designated as Open Space, should be designated Hazard Land (see Section 2). These ponds are created for flood control, require periodic maintenance and supervision, and cannot be utilized by the public.
- Strengthen policies to encourage the development of new parks in close proximity to new residential development to ensure that all residential developments are within 500 metres of functional parklands or open spaces (i.e., larger than parkettes).
- The Town's objective for the establishment of a continuous linear open space system must be expanded to emphasize the importance of the connectivity of parks and open spaces, the overall trail network, and waterfront access. The linear park system should provide active transportation links to community centres/services, as well as access to natural areas and recreational facilities. Connectivity to the linear open space system should be required for new residential development and commercial areas.
- Cash-in-lieu for parkland dedication should be permitted only for smaller developments (e.g., less than 20 units). Larger developments must provide functional parkland (i.e., larger than parkettes).

9. Transit & Transportation

The primary transportation concern of TBM residents is the limited capacity of Highway 26. The Transportation Master Plan confirms that Hwy 26 is already reaching capacity at peak times. Long traffic delays at key intersections, difficulties exiting neighbourhoods with no alternative access, and unsafe pedestrian crossings are now common complaints. Given projected TBM growth, this situation will only become more frustrating for residents and visitors, and increasingly dangerous, with the potential to seriously disrupt the functioning of congested parts of Town at peak times. TBM has very few options available to limit or control traffic along this corridor.

- TBM, in conjunction with County partners and the Province, should strengthen efforts to:
 - Identify and implement opportunities to improve traffic flow and safety along Highway 26, which could include traffic lights, roundabouts and turning lanes.
 - Promote the need for a Highway 26 bypass.

- BMRA supports updating the transportation objectives in the OP, as outlined in the *Transportation Policies Background Paper*, to make OP policies consistent with the policy recommendations in the Transportation Master Plan.
- Strengthen/expand transportation policies re: public transit, shared transportation options, EV chargers in new developments, traffic calming in settlement areas.

10. Infrastructure & Servicing

The costs of infrastructure development continue to rise rapidly, creating significant risks and uncertainties related to the capacity of TBM to provide sustainable long-term infrastructure and services that match the current pace of growth and development. This is amplified by the current distorted financial relationship with Grey County.

The Natural Heritage Study and the Natural Asset Inventory are important projects that relate closely to the OP update. It is anticipated that the results of both projects will be fully integrated into the OP, so that natural assets are identified and strictly protected and enhanced for their value as important components of TBM infrastructure, as well as the essential role they play in environmental protection, wildlife habitat, climate change mitigation/adaptation, our quality of life and local economy.

- Policy updates should follow the Drainage Master Plan and the Natural Asset Inventory to ensure updated and resilient stormwater management throughout TBM.
- Include policies that enable the implementation of a capacity allocation bylaw requiring any development applying for water/wastewater reservation to provide Community Benefits such as attainable/affordable housing and GDS, as well as sustainable servicing, drainage and construction/material solutions, and other sustainability options.

11. Community Character and Design

The protection and enhancement of the character of rural areas, natural features, and settlement areas in TBM is a long-standing priority for residents. It is important to recognize the critical role that design plays in how residents respond to proposals for new development. The quality of design, including most importantly compatibility with community character, is typically far more important in determining the acceptability of new development than quantitative metrics such as number of units.

- Comprehensive and enforceable intensification and greenfield criteria (see Sections 4,5) are required to ensure compatibility.
- Updated *Community Design Guidelines*, again, are essential and must be a top priority. Many design options and standards have been improved since the 2012 Guidelines were created.

12. Community Planning Permit System

The CPPS offers the potential to serve as an important tool to help ensure the implementation of OP policies, although more work is required to determine where and how the CPPS can be applied. The *CPPS Policies Background Paper* provides some general suggestions for CPP By-law areas. Further study and extensive public engagement will be required to identify and prioritize areas for CPP By-laws.

- Include CPPS enabling policies in the updated OP.

- The current OP update should include one area designated for a CPPS to serve as a pilot. Additional areas can be identified and included in future OPs.
- Identify the full scope of building and development conditions/requirements that can be addressed by a CPP bylaw. These include all items typically covered by Zoning By-laws and Site Plans, as well as urban design and landscaping details, and a full range of environmental protection measures, such as the protection of trees, shorelines, floodplains and other natural assets.
- Include policies to enable TBM to establish Community Benefits as a tool to require benefits such as affordable housing or GDS as condition for development that may exceed the maximum density or the 3-storey height limit within a specific area covered by a CPP By-law.
- Include policies that enable Inclusionary Zoning (IZ), understanding that the Province has not yet provided full clarity on whether IZ can be implemented through a CPPS.
- Specify that a CPP By-law cannot be approved prior to the update and approval of the Town's Community Design Guidelines, and the completion of the Natural Heritage Study and Natural Asset Inventory. These key documents must be referenced in the OP. Any CPP By-law must incorporate measures to ensure application of the Design Guidelines and protection of Natural Assets.
- Include the full range of Goals and Objectives outlined in the *CPPS Policies Background Paper*. Strengthen and expand upon Environmental Protection and Sustainability goals/objectives to ensure that all of the Town's well documented priorities in these areas can be addressed.
- Include a comprehensive list of criteria that must be considered when evaluating a CPP bylaw.
- Communicate to the public that implementation of a CPP By-law changes the approval process fundamentally. All public and stakeholder consultation is front ended, and there are no third-party appeals. Public understanding and acceptance of these changes is essential. Extensive communication to residents and stakeholders in or impacted by areas identified for a CPPS By-law must be mandatory.

From: [CA - Circulations](#)
To: [Karen Long](#)
Subject: RE: Notice of Public Meeting - October 1, 2024
Date: September 9, 2024 4:10:16 PM
Attachments: [image003.png](#)
[image002.png](#)
Importance: Low



Your E-mail was Received on: Monday, September 9, 2024

Thank you for your email on: Notice of Public Meeting - October 1, 2024

The information that municipalities provide to Bell Canada is instrumental to the provisioning of telecommunications infrastructure and we appreciate the opportunity to be proactively engaged in development applications and infrastructure and policy initiatives.

Bell Canada will provide a response should any comments / input be required on the information included in the circulation received. Bell Canada kindly requests that even if a specific comment is not provided at this time that you continue to circulate us at circulations@wsp.com on any future materials related to this development project or infrastructure / policy initiative so that we can continue to monitor its progress and are informed of future opportunities for engagement.

1) Bell Canada Responses to Pre-Consultation & Complete Development Application Circulations:

Pre-consultation Circulations

Please note that Bell Canada does NOT generally comment on pre-consultation circulations unless the information provided identifies that a future draft plan of subdivision, draft plan of condominium and/or site plan control application will be required to advance the development proposal.

Complete Application Circulations & Recirculations

Please note that Bell Canada does NOT generally comment on the following development applications - official plan and zoning by-law amendments, part lot control, temporary use and interim control by-laws. However, Bell Canada does generally comment on site plan approval, draft plans of subdivision and draft plan of condominium applications.

Bell Canada will generally comment on recirculations where the change modifies the proposed residential dwelling unit count and/or non-residential gross floor area in a draft plan of subdivision, draft plan of condominium and/or site plan control application.

2) Bell Canada Responses to Infrastructure and Policy Initiative Circulations:

If required, a follow-up email will be provided by Bell Canada to outline any input to be considered on the infrastructure / policy initiative circulation received at this time.

Concluding Remarks:

If you have any other specific questions, please contact planninganddevelopment@bell.ca directly.

We note that WSP operates Bell Canada's development tracking system, which includes the intake and processing of municipal circulations. **However, all responses to circulations and requests for information, such as requests for clearance, will come directly from Bell Canada, and not from WSP.** WSP is not responsible for the provision of comments or other responses.

Should you have any questions, please contact the undersigned.

Yours Truly,



Juan Corvalan
Bell Canada
Senior Manager – Municipal Liaison
Network Provisioning
planninganddevelopment@bell.ca

From: Karen Long <klong@thebluemountains.ca>
Sent: Monday, September 9, 2024 8:01:24 PM
Subject: Notice of Public Meeting - October 1, 2024

Good afternoon,

Further to my email of August 15, 2024, please find attached the addition to the October 1st Public Meeting agenda, the Notice of Public Open House and the Public Meeting for the Official Plan 5-Year Review.

If you have any questions or comments, please do not hesitate to contact the Planning Department at planning@thebluemountains.ca

At this time, I trust you find this in order,



Karen Long

Administrative Assistant for Planning Services

Town of The Blue Mountains, 32 Mill Street, P.O. Box 310, Thornbury, ON N0H 2P0

Tel: 519-599-3131 ext. 263 | Fax: 519-599-7723

Email: klong@thebluemountains.ca | Website: www.thebluemountains.ca

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From: [Kyra Dunlop](#)
To: [Lingard, Norman](#); [Town Clerk](#); circulations@wsp.com
Cc: [SMT](#); [Planning General](#)
Subject: RE: Official Plan 5-Year Review
Date: September 23, 2024 11:44:48 AM
Attachments: [image002.png](#)
[image004.png](#)
[image001.png](#)

Hello,

We acknowledge receipt of this email and confirm planning staff are copied hereto for information,

Kyra Dunlop

Deputy Clerk, BA (Hons)

Town of The Blue Mountains, 32 Mill Street, P.O. Box 310, Thornbury, ON N0H 2P0

Tel: 519-599-3131 ext. 306| Fax: 519-599-7723

Email: kdunlop@thebluemountains.ca | Website: www.thebluemountains.ca

As part of providing [accessible customer service](#), please let me know if you have any accommodation needs, require communication supports or alternate formats.

From: Lingard, Norman <norman.lingard@bell.ca>
Sent: Monday, September 23, 2024 11:39 AM
To: Town Clerk <townclerk@thebluemountains.ca>
Subject: Official Plan 5-Year Review

Good morning,

Thank you for continuing to circulate Bell Canada on the Town of The Blue Mountain's upcoming Public Open House and Meeting to discuss the 5 year review of the Official Plan. Bell appreciates the opportunity to engage in infrastructure and policy initiatives across Ontario.

While we do not have any additional comments or concerns pertaining to the review at this time, we would ask that Bell continue to be circulated on any future materials and/or decisions related to this matter.

Please forward all future documents to circulations@wsp.com and should you have any questions, please contact the undersigned.

Have a great week.

Yours truly,

Norm Lingard
Senior Consultant – Municipal Liaison
Network Provisioning
norman.lingard@bell.ca | 📞 365.440.7617



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September 24, 2024

Mr. Adam Smith
Director, Planning and Building Services
Town of The Blue Mountains

Dear Mr. Smith,

**RE: Town of The Blue Mountains
Official Plan 5 Year Review
Blue Mountain Resort Comments**

Your files will show that we are the Planning Consultants of record, retained by Blue Mountain Resorts (BMR) to assist in land use planning matters.

Please accept this letter as our comments as part of the Official Plan 5 Year Review, in particular, the draft of the Official Plan made available September 2024 (draft Official Plan). These comments are provided as part of the Public Meeting process that includes the statutory public meeting scheduled for October 1, 2024. There are several additional policies proposed in the draft Official Plan. At this point, some of the proposed policies are addressed in this response.

(Note: Page numbers below refer to the page numbering found in the track changes document of the draft Official Plan ('OP' or 'Plan')).

By copy of this we are advising the Clerk of these submission comments and, request to be notified of future public meetings and decisions regarding the Town's Five-Year Review of its Official Plan.

1. As of September 2024, it is our understanding that the draft Official Plan land use Schedule 'A-5' proposes no land use designation changes. We request confirmation of this understanding.
2. Page 23: Adds "Recreational Residential Settlement Area" sub-title. This is clarification on the nature of the area and is in line with the Provincial and Grey County planning policies. **Supported.**

3. Page 23: Notes Blue Mountain Village Resort Area under new heading “Recreational Resort Settlement Areas”. Puts the area into the “Settlement” category – no issue as this is a beneficial clarification and in line with the County OP and Provincial Policy Statement. **Supported.**
4. Section A.3.8, Economic Development, p.33: Tourism is a major economic driver for the Town but is not specifically referenced as such in this section. However, Tourism does have its own section (A3.9, p.34). **This tourism sector link gap with Economic Development policies can be bridged by additional wording to the Tourism and Recreation Goal statement (A3.9.1, p.34) so that it reads as follows: “To support the Tourism and Recreation sector by enhancing opportunities for tourism and recreational uses and related development.”**
5. Section A3.11, Affordable and Attainable Housing, p. 36. The additional objective number 4 (p.37) includes reference to “purpose-built employee housing”. **Supported.**
6. Section B2.7, Additional Residential Units (p.53) provides updates on the “as of right allowances” for additional residential units within an existing dwelling or lot. Overall, this allows for additional smaller units for rent which may lead to more affordable rental units. **Supported.**
7. B2.18, Employee Housing (p.62). New policy picking up for most part on previous BMR submission to Grey County OP review. No concerns. **Supported.**
8. Sections B3.7.4.6 and B3.7.4.7, Golf Courses and Recreational Uses, pp. 86-88: No changes. No concerns. However, B3.7.4.7 could have an additional policy regarding new types of recreational uses as the references in this section tend to apply to traditional, existing forms or types of recreational uses. Rather than second guessing specific future uses and adding unnecessary items to the list, **consideration could be given to a new subsection “f)” (p.89) having the following wording: “The Plan anticipates that additional recreational use types will evolve to reflect innovation and changing demographics. The establishment of such uses will be guided by applicable directions provided in Section B7.7.4.7 a) through e).**
9. Section B3.10, The Blue Mountain Village Resort Area, p.95. The provision of “additional residential units” to Subsection B3.10.4.1, p. 96; clarification on permitted uses in the medium density designation, p.97; no other changes. **No concerns with these changes.**
10. Section B3.10.9 provides general development policies for the BMVR area. There is a restriction on the maximum number of residential units within the area of 1,000, (g),

p.100). It is unclear how this maximum number of residential units is calculated or how many existing units are within the area.

11. Section B3.10.10, General Development Policies, pp. 101-102, specify the need for development approvals of plans and agreements. Reference is made to “site plan agreements” in subsection a). This subsection does not recognize, or list, a “Master Development Agreement” as a separate instrument and does not appear to require one for development of the Village, even though such an agreement exists. **As the Town and Developer have entered into a Master Development Agreement, subsection a) should be modified by adding the following as a third sentence: “To ensure approvals, plans and agreements that are required for separate phases or developments, a Master Development Agreement for the Village Core shall be required.”** With this, the existing last sentence in subsection a) needs to be modified from “The development agreement...” to “Development agreements ...”.
12. Section B3.11, p.102, provides land use policies for the Recreational Ski designation. As B3.11.1 reads at present, the land use priority would read as “service and maintenance” uses. However, to accurately reflect the range of land uses permitted and existing, the words “in particular” should be replaced by the word “including”.
13. Subsection B3.11.3, p.103, lists the range of permitted uses in the Recreational Ski designation. To properly reflect the existing range of uses, the permitted uses in b) should be expanded. The proposed wording would revise the existing “service and maintenance facilities” to “resort administration, service and maintenance facilities”. In addition, “base lodge” should be added to the list of permitted uses in e). The revised e) would therefore read “base lodges and outdoor recreational uses”.
14. Section B3.11.6.1, p.104, provides specific policy for the BMR “Top of Hill” lands. Permitted uses include:
 - i. Ski lift and trails
 - ii. Parking area
 - iii. Private and public parks
 - iv. Outdoor recreational uses
 - v. Small scale accessory buildings with maximum floor area of 50 sqm
 - vi. One new base lodge with maximum floor area of 600 sqm

b. In addition, this policy specifies that the base lodge be connected to municipal water and sewer services. **Regarding servicing of the base lodge use, this policy could be amended with the addition of the following as a last sentence: “Alternative approaches to sewer servicing of the base lodge use may be considered by the municipality and to the satisfaction of Council.”**

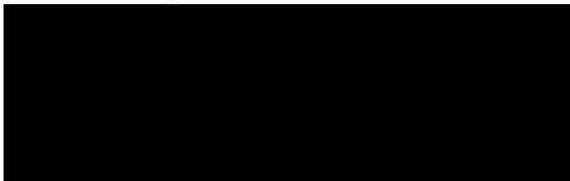
15. Section D, General Development, p.192. There is an important policy addition in subsection D1.2, Preferred Means of Servicing in Settlement Areas. This may have implications on servicing options for future development on top of the hill at south end. As written, this policy could nullify any consideration for alternative servicing options. Additional wording could be proposed to allow for consideration of alternative servicing options. **Adding the following may be considered: “Partial servicing options may be considered under circumstances appropriately justified and accepted by the Town”.**
16. Section D2.5, Active Transportation, p. 206 has several new, additional policies geared towards promotion of cycling and pedestrians. The additional policies in D2.5 illustrate an increased awareness of elements comprising and supporting Active Transportation and merit support as for the most part they align with BMR directions on the matter of pedestrian and cycling infrastructure. Subsection D2.5 e), p. 207, is new and relates active transportation to tourism. **Supported.**
17. Section D2.7, Public Transit, p.209, proposes several additional policies regarding public transit. All of these policies align with employee and guest options. **Supported by BMR.**
18. Section D2.8, Parking, pp. 209-210 proposes policies that for the most part do not directly apply to BMR. However, policy D2.8 d) would anticipate the town supporting off-site parking supply for developments. Generally, parking must be supplied on the lots having developments generating the demand for parking. This policy allows consideration for required parking demand to be satisfied in part on off-site lands. **Supported.**
19. Section D6, Public Parkland and Open Space pp. 225-236 is an extensive policy section addressing public parkland and is most applicable to town owned lands and facilities and new developments. Nonetheless, of note is that subsection D6.3.6, Shoreline Acquisition and Access Polices, p.235 is proposed to remain as is. The overall objective remains in place to “create an appropriate number of public waterfront parks distributed along the length of the shoreline”. It is a policy of the Plan to expand the number and extent of public access points to the Nottawasaga Bay Shoreline. **The policy objective assumes that the Town alone must achieve these objectives. Missing in this policy, as a means of achieving these objectives, is the opportunity to partner with other government and non-government agencies in addition to the private sector. It is suggested that consideration be given to expanding this direction to account for the additional options and opportunities to achieve the overall goal.**
20. Section D7.4, Affordable and Attainable Housing, pp. 237-239 introduces new policies that, for the most part, seek to plan for such housing. These new policies are consistent with the most recent and contemporary housing policy initiatives at both the Provincial and County level. Although some of the detail in some of the proposed policies are

unrealistic insofar as private sector abilities (eg. Subsection a), b), d)) the overall intent merits support.

21. Section E1.3, Minor Zoning By-law Amendments, p. 251, proposes a policy that would enable delegation to the Planning Director the authority to review and approve minor amendments to the Zoning By-law. This is a major step toward streamlining a process currently subject to unnecessary procedural, review and approval timelines and costs. **Merits support.** Likewise, Sections E1.4.1, p.252 and E1.5.3, p.253, propose new policies enabling down delegation of approval authority to the Planning Director. **Merits support.**
22. Section E1.8, Public Participation, pp 255-256 proposes new additional policies requiring development proponents to provide a public consultation strategy. These proposed policies may exceed the requirements of the Planning Act and should be subject to further discussion and review. The development industry as a whole should be commenting on these proposed policies.
23. Section E10, Complete Application Requirements, pp 272-279 introduces new policy addressing requirements for a "Complete Application". Many of the noted 89 potential studies/reports that may be required (see pages 275-279) are provided in the existing OP. As with E1.8 above, it is anticipated that the development industry will review this in more detail, especially in light of Bill 185 and changes to the Planning Act.

Overall, BMR appreciates the efforts by the Town to review and update the Official Plan, its primary land use policy document. There are several proposed new policy directions that merit support and some of those are noted above. In addition, we have taken this opportunity to comment on a few existing policies that may benefit from relatively minor changes. BMR would welcome further discussion with the Town if further clarification is needed.

Yours truly,



Travis & Associates
Colin Travis MCIP RPP

Cc: Owner: BMR- Dan Skelton, Sarah Vint
Town of The Blue Mountains: Corrina Giles, Shawn Postma



September 24, 2024

Mr. Adam Smith
Director, Planning and Building Services
Town of The Blue Mountains

VIA EMAIL ONLY

Dear Mr. Smith,

**RE: Town of The Blue Mountains
5 Year Review Comments
Homefield Communities**

Your files will show that we are the Planning Consultants of record, retained by Homefield Communities. Homefield Communities has an interest in lands having the municipal address of 496857 Grey Road 2 (property location and context map below).



Please accept this letter as our comments on the 5 Year Official Plan Review, in particular the draft of the Official Plan made available September 2024 (draft Official Plan). These comments

are provided as part of the Public Meeting process that includes the statutory public meeting scheduled for October 1, 2024. By copy of this we are advising the Clerk of submission of these comments and, request we be notified of future public meetings and decisions regarding the Town's Five-Year Review of its Official Plan.

By way of background, we acknowledge that further to formal preconsultation exercises with the Town throughout 2023/2024, applications were submitted for an Official Plan Amendment, a Zoning By-law Amendment and Draft Plan of Subdivision on September 13, 2024 covering the lands at 496857 Grey Road 2 and as identified in the above map. The overall purpose of the Official Plan Amendment application is to re-designate a portion of the subject lands from "Rural" to "Community Living Area".

The following are our comments on the September 2024 Draft Official Plan:

1. The subject lands are designated in the County of Grey Official Plan as being within the Thornbury Settlement Area. As such, development of the lands for urban type uses on full municipal services is anticipated and permitted. Existing Town of The Blue Mountains Official Plan Schedule 'A-2' designates portions of the subject lands "Rural" and "Hazard". To align with the County Official Plan, the "Rural" designated lands merit the "Community Living Area" designation in the Town Official Plan.

In the Five-Year Review draft Official Plan, the Town of The Blue Mountains Community Structure Plan (page 22 in the track changes document) shows the subject lands as lying within the "Thornbury Clarksburg Settlement Area". However, the same Five-Year Review mapping materials retains existing Schedule 'A-2' land use designations ("Rural" and "Hazard").

Although we have noted previously that an application to amend the Official Plan has been submitted to re-designate a portion of the subject lands as "Community Living Area", (while retaining the "Hazard" designated lands), it is respectfully requested that the current Five-Year Review exercise is an ideal opportunity for the Town to designate the "Rural" portion of the subject lands as "Community Living Area". This would result in a full and proper alignment between the Town Official Plan and the County Official Plan while respecting the intent of the aforementioned "Community Structure Plan".

The draft Official Plan further expands policy on Settlement Areas in Section A2.2 (p.23) as excerpted over. It is clear that Settlement Areas are to be areas having a mix of urban land uses designated for development over the long term. Section A2.2 refines the Thornbury/Clarksburg area as a "Primary" Settlement Area and one which is to make efficient use of infrastructure and provide opportunities for affordable and attainable housing. These additional policy directions are supported by Homefield and reinforce the appropriateness of designating the "Rural" portion of the subject lands as "Community Living Area".

SETTLEMENT AREAS

The Province of Ontario recognizes Settlement Areas as urban areas and rural settlement areas within municipalities (such as cities, towns, villages and hamlets) that are: built up areas where development is concentrated, and which have a mix of land uses; and lands which have been designated in an Official Plan for development over the long term.

The County of Grey refines the Provincial Settlement Areas further into Primary Settlement Areas, Secondary Settlement Areas, Recreation Resort Area (Settlement Areas) and Escarpment Recreation Area (Settlement Area). The County Official Plan provides further policy direction and growth targets by Settlement Area type.

The Town of The Blue Mountains refines the County of Grey Settlement Areas further again with six Settlement Areas, each having further policy direction and growth targets.

Thornbury/Clarksburg Primary Settlement Area - the main concentration of urban activities including commercial, residential, cultural and government functions in a well-designed land use form. It is intended that the settlement area will continue to function as a place of symbolic and physical interest for residents and visitors. A range of housing types is supported but all new *development* should respect the *character* of the community and established neighbourhoods while making efficient use of infrastructure and providing for affordable and attainable housing.

Draft Official Plan Settlement Area Excerpt (A2.2)

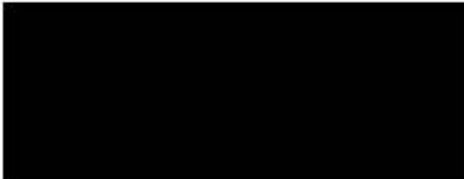
2. Section A3.4.2 is part of the Growth and Settlement policy framework (p.29) encourages greenfield development to use land and infrastructure efficiently. This is a consistent theme to development approaches in provincial and county planning policy and is supported by Homefield Communities.
3. Section B2.16, Intensification Criteria, pp.60-61, introduces several new policies guiding "intensification". Similarly, Section B2.17, pp. 61-62 introduces new policies applicable to applications for development of "greenfields". These new policies provide a framework within which new development can be considered. Our client supports these additional policy directions as they represent contemporary planning principles useful in preparing development plans within the Community Living Area designations.
4. Section B3.1, Community Living Area, p. 63, now includes "affordable and attainable housing" in policy encouraging the provision of a full range of housing opportunities.
5. Section B4.4, Rural, p.138 provides policies regarding the "rural" areas of the Town. In the context of growth, Section B3.1.1 directs that a "significant portion of the Town's growth" is to be directed to the Primary Settlement Area of Thornbury-Clarksburg. It is clear that the "Rural" designation and policies to apply to lands in the Town that are

intended to remain rural in nature and use. It is equally clear that the "Rural" designation on the subject lands is inappropriate as the subject lands are unquestionably within a Primary Settlement Area referred to in the Official Plan as the "Thornbury/Clarksburg Settlement Area". It may be argued that the "Rural" designation is an appropriate "holding" designation pending the more appropriate "Community Living Area" designation. However, the land use policy provided in Section B4.4 makes no reference to such a function or, anticipated urban designation. Such a reference would be inappropriate. This speaks to the need for this Official Plan review to properly reflect the established intended urban use of the developable portions of the subject lands and have the lands removed from the "Rural" designation as requested in point 1, above.

6. Section D7.4, Affordable and Attainable Housing, p. 237, introduces several new policies that reflect the increased awareness of the need for communities to provide housing to meet a full range of housing needs. As noted previously, the overall policy recognition of this is provided in Section B3.1 (point 5, above). The policy approach is laudable. Unfortunately, the policy does not clearly acknowledge the practical role the private sector can undertake in the provision of attainable and affordable housing. We understand that the development industry, through the GTDI, will be commenting on the proposed implementation policies provided in this section. Nonetheless, our client advises that the fundamental purpose of their development plans is to provide a housing component that will contribute to the affordable and attainable policy intents primarily through the provision of smaller unit sizes at appropriate densities and by implementing the land lease ownership model.
7. Section E1, Plan Implementation and Administration, p.245, sets out additional implementation tools (for example the Community Planning Permit By-law) and policies. Policies enabling the delegation of certain approvals to Staff (for example E1.3, E1.4.1, E1.5.2 and E1.5.3) represent positive procedural efficiencies that should result in less time consuming and expensive approvals for minor planning considerations and approvals. These are positive moves and are supported.
8. Section E1.8, Public Participation, p.255, introduces a policy requiring a public consultation strategy from development proponents. We understand the development industry will be commenting further on this. Our client's position is that they will follow the public planning process as enabled through provisions of the Planning Act. Beyond that, additional public engagement will be a result of further discussions with the approval authorities.
9. Section E10, Complete Application Requirements, p.272 is another section that we believe the development industry will be commenting on. As noted above, our client will provide materials that are required under provision of the appropriate enabling legislation (for example, the Planning Act).

Our client appreciates the efforts by the Town to review and update the Official Plan, its primary land use policy document. There are several proposed new policy directions that merit support. We have taken this opportunity to comment on a few of the proposed policies and have requested policy consideration on the "Rural" land use designation. We would welcome further discussion with the Town if further clarification is needed.

Yours truly,



Travis & Associates
Colin Travis MCIP RPP

Cc: Client: Homefield Communities
Town of The Blue Mountains: Corrina Giles, Shawn Postma

From: [Kyra Dunlop](#)
To: [REDACTED] [Town Clerk](#)
Cc: [Council](#); [SMT](#); [Planning General](#)
Subject: RE: Official Plan 5 Year Review comments for Public Meeting October 1
Date: September 26, 2024 8:48:34 AM
Attachments: [image001.png](#)
[image003.png](#)

Hello,

I acknowledge receipt of your comments below regarding the October 1 2024 Public Meeting re Official Plan 5 Year review. By way of copy your comments are being provided to Council and staff, and will be read aloud at the meeting. Your comments will also be included in the followup staff report.

Kyra Dunlop

Deputy Clerk, BA (Hons)

Town of The Blue Mountains, 32 Mill Street, P.O. Box 310, Thornbury, ON N0H 2P0

Tel: 519-599-3131 ext. 306| Fax: 519-599-7723

Email: kdunlop@thebluemountains.ca | Website: www.thebluemountains.ca

As part of providing [accessible customer service](#), please let me know if you have any accommodation needs, require communication supports or alternate formats.

From: JOANNE DEVISSER [REDACTED]
Sent: Wednesday, September 25, 2024 8:52 PM
To: Town Clerk <townclerk@thebluemountains.ca>
Subject: RE: Official Plan 5 Year Review comments for Public Meeting October 1

Dear Madam Clerk, Staff, Council and Consulting team

I respectfully submit the following feedback for the Draft Official Plan Review October 1, 2024.

First I commend the team and appreciate the ability to provide input as a resident of this town.

I recommend a revision to the 'Tourism' references in section A 3.9. Recreation and Tourism, to include the Tourism Strategy - and qualify all references throughout the plan as such.

If we are to continue a designation as a 'four-season recreational resort community', greater criteria, definitions and guardrails are needed to effectively manage how the tourism sector will be accommodated – while maintaining the integrity of our natural environment. Recognizing that the Tourism Strategy is still in development, it should be identified as the 'governing document' as it will (and will continue to) reflect the current best-practices and direction for Tourism development; this should help clarify and provide consistency for tourism decisions.

The Tourism sector is undergoing significant change as new understanding of its impact on our 'places' and that globally we need to preserve our natural spaces in a way that also enables their enjoyment and preservation. The Tourism strategy will play an important role and the Official Plan should reflect this.

For example:

A.3.6.2 Strategic Objectives (for Rural and Open Space Character)

“Encourage the *development* of passive low-intensity recreational and **eco-tourism** uses in the Town, provided such uses maintain the natural environment and *character* of surrounding areas.”

- This infers a preference for eco-tourism but this may not be ideal in all situations.
- Perhaps reframe to: ‘Encourage the development of passive low-intensity recreational and **tourism** uses in the town, provided such uses maintain the natural environment and *character* of surrounding areas, **and tourism development aligns with current approved TBM Tourism strategy**.’
- Any reference to Tourism should include this requirement.

Respectfully submitted,

Joanne de Visser

Sent from Yahoo Mail. [Get the app](#)

**Provided on behalf of the Public School Boards:
Bluewater District School Board & Bruce-Grey Catholic District School Board**

September 27, 2024

Shawn Postma
Town of the Blue Mountains
32 Mill Street, P.O. Box 310, Thornbury
Ontario N0H 2P0
Email: OPReview@thebluemountains.ca

Electronic Copy

Re: COMMENT LETTER
Notice of Public Open House and Public Meeting
Official Plan 5 Year Review

Dear Shawn Postma,

On behalf of the Bluewater District School Board (BWDSB) and Bruce-Grey Catholic District School Board (BGCD SB), we confirm receipt of the Town of the Blue Mountains Notice of Public Open House and Public Meeting – Official Plan 5 Year Review dated September 9, 2024. In relation to this initiative, the School Boards would like to submit the following comments:

Location:

Bluewater District School Board (BWDSB)

The Town of the Blue Mountains is served by the following Public Board catchment areas:

- Beaver Valley Community School (JK-8)
- Osprey Central School (JK-8)
- Georgian Bay Secondary School (9-12)
- Grey Highlands Secondary School (9-12)

Most of the Town of the Blue Mountains is served by Beaver Valley Community School (JK-8) in Thornbury-Clarksburg and Georgian Bay Secondary School (9-12) in the



neighbouring municipality of Meaford. However, a small section of the southeastern town limits, encompassing both Osler Bluff and Pretty River Valley Provincial Park, fall within the catchment areas of Osprey Central School (JK-8) in Maxwell and Grey Highlands Secondary School (9-12) in Flesherton, both located within the neighbouring municipality of Grey Highlands.

Bruce-Grey Catholic District School Board (BGCDSB)

The Town of the Blue Mountains is served by the following Catholic Board catchment areas:

- St. Basil Catholic School (JK-2)
- Notre Dame Catholic School (3-8)
- St. Mary's High School (9-12)

The BGCDSB currently does not have a physical school presence in the Town of the Blue Mountains. Students in this area are served by schools located in Owen Sound, with catchment areas extending across a broad landmass that encompasses the entire Bruce Peninsula and forms both the Board's eastern and northern boundaries. These catchments also stretch southward near Markdale and eastward to the Town of the Blue Mountains, serving approximately 40-45% of the Board's entire service area.

Comments:

The BWDSB and BGCDSB support the Town's focus on managing growth by directing residential development to serviced areas as outlined in **Growth and Settlement Policy A3.4**. However, with the anticipated growth in settlement areas such as Thornbury-Clarksburg and Craigleith, it is essential that school capacity planning is closely integrated with residential development projections. The Board urges the Town to ensure that sufficient land is allocated for new school sites in areas experiencing rapid population growth and to prioritize the alignment of infrastructure and municipal services with the development of educational facilities.

The BWDSB and BGCDSB fully support the Town's **Affordable and Attainable Housing Policies A3.11 and D7.4**, recognizing their importance in fostering a diverse and inclusive community. However, as these developments often attract families with school-age children, it is critical that the increased demand for educational infrastructure be factored into the planning process. The BWDSB and BGCDSB request that the Town integrate school capacity planning within its housing strategies to prevent unmanageable oversubscription and ensure that all children have access to quality education within a reasonable distance to home.



The BWDSB and BGCDSB fully support the Town's commitment to sustainable development, energy efficiency, and green building standards as outlined in the **Climate Change Action Policy A3.3** and **Green Development Standards Policy D8.1**. Bluewater District School Board's **Environmental Sustainability Policy 2105-D** and the Bruce-Grey Catholic District School Board's **Environmental Stewardship Policy 2-265** align with these objectives by prioritizing sustainable practices in the design, construction, and renovation of school facilities. By integrating these shared goals, we can ensure that future developments contribute to a healthier, more energy-efficient, and environmentally responsible community.

The BWDSB and BGCDSB recognize the importance of the **Community Living Area Policy B3.1** in supporting residential growth. As these areas are expected to accommodate much of the Town's new housing, it is essential to reserve sufficient land for the development of new schools to serve the growing population.

The BWDSB and BGCDSB support **Institutional Area Policy B3.6** which permits the development of schools. The criteria for development, including compatibility with surrounding land uses, adequate site size, and connection to municipal services, align with the school board's priorities for providing safe, accessible educational facilities. However, we encourage the Town to work closely with both the BWDSB and BGCDSB to identify future school sites in areas experiencing significant residential growth, such as Thornbury-Clarksburg and Craighleith, ensuring that school development aligns with population increases.

The BWDSB and BGCDSB recognize the critical importance of infrastructure and servicing, including water, sewage, and stormwater management, as outlined in **Water and Sanitary Sewer Servicing Strategy Policy D1**. Adequate and timely infrastructure investments are essential to support the development of new school sites, ensuring they are fully serviced and operational in alignment with residential growth. The BWDSB and BGCDSB advocate for coordinated planning between the Town and the Boards to ensure that school sites are prioritized in infrastructure development timelines, preventing delays in school construction and mitigating the impact of rapid population growth on existing facilities.

The BWDSB and BGCDSB support the Town's **Public Parkland and Open Space Policy D6**, recognizing the vital role parks and parkland play in providing recreational opportunities for both students and the general community. Schools often rely on nearby parks for physical education and extracurricular activities, making these spaces essential for fostering active lifestyles. The BWDSB and BGCDSB encourage the Town to design parks and open spaces that allow for shared-use between schools and the broader community, maximizing the utility of these public resources. To further enhance this collaboration, the BWDSB and BGCDSB recommends the inclusion of a policy that promotes the adjacency of schools and parks, ensuring easy access and efficient land use.



Additionally, both the BWDSB and BGCDSD are open to discussing shared-use agreements with the Town to further enhance the availability of recreational spaces for both students and residents. The Boards also have established permit processes that allow for community use of school facilities, ensuring schools can serve as key hubs for community activities outside of school hours.

New School Site Selection Principles:

The selection of future school sites should be guided by the following key principles to ensure they effectively serve the community and support high-quality educational outcomes:

- **Infrastructure Access:** School sites must be strategically located to provide convenient access to essential infrastructure, including well-connected road networks, utilities, and public transportation. This will ensure safe and efficient access for students, staff, and the broader community.
- **Traffic Impact and Student Safety:** The selection and development of school sites must prioritize traffic safety and the efficient management of traffic flow. This includes the provision of well-designed drop-off and pick-up zones, clearly marked pedestrian crossings, and adequate parking facilities. School sites should be strategically located away from high-traffic-generating areas, such as entrances or exits to high- or mid-rise residential developments, commercial or industrial zones, or other schools, to ensure pedestrian safety and smooth traffic circulation.

Preference should be given to controlled intersections over roundabouts near school sites to enhance pedestrian safety, as controlled intersections are typically easier to staff with crossing guards. Additionally, measures should be implemented to mitigate traffic congestion in the surrounding areas, anticipating pick-up and drop-off patterns, to ensure a safe and accessible environment for students, staff, and the broader community.

- **Site Characteristics, Size, and Design:** Elementary school sites should ideally encompass 2.43 ha (6.0 ac) with a rectangular configuration and minimal cross-slope. The site should feature two road frontages, with at least one frontage measuring 140m or more, and be located proximal or adjacent to a collector road. The primary frontage should align with potential street intersections, and driveways should be carefully placed to avoid direct alignment with the school's main entrance. Sites must also be free from known encumbrances, such as environmental or cultural heritage constraints, and should not be subject to environmental hazards, including floodplains or unstable or hazardous soil conditions, which could hinder or delay construction.



Furthermore, school sites must be of sufficient size to accommodate all necessary facilities, such as playgrounds, sports fields, and green spaces. The site design should provide flexibility for future expansions and evolving educational needs. Where land assemblage is required, it should involve as few landowners as possible, ensuring that all parcels are made available within the same phase of development to avoid delays.

- **Compatibility with Surrounding Land Uses:** School sites should be compatible with adjacent land uses, such as residential, recreational, and community facilities, to ensure harmonious integration within the broader community. Ideally, school sites should be centrally located within planned developments to maximize walkability and be positioned adjacent to public parks or community facilities, such as libraries or other community facilities. Additionally, it is essential to avoid proximity to industrial zones or high-traffic areas to ensure a safe, conducive, and supportive environment for students and staff.

As the Town of the Blue Mountains grows, both the BWDSB and BGCDSD will need to accommodate an increasing number of students and ensuring that school sites are secured early in the planning process is critical. The Boards commit to playing their part by providing timely responses to development application circulations and actively monitoring growth trends. This will ensure that conversations about school needs occur at the earliest stages of planning, enabling both the Town and School Boards to take proactive steps in identifying and reserving suitable school sites.

We will continue to monitor development growth in the Town of the Blue Mountains on behalf of both the BWDSB and BGCDSD as it relates to the cumulative impact on local schools. The BWDSB and BGCDSD also request notification of any modifications, community consultations, appeals, or notices of decision related to this official plan review.

Please note that further to the comments provided, the BWDSB and BGCDSD reserve the right to revise their position as needed without further notice. Should you require additional information regarding these comments, please contact vw@watsonecon.ca.

Sincerely,



Adam Brutto BURPI.
Senior Consultant



Watson & Associates Economists Ltd.

brutto@watsonecon.ca

Office: 905-272-3600 Ext. 278

Mobile: 905-967-4775

Fax: 905-272-3602

cc: Andrew Low, Bluewater District School Board
Shelley Crummer, Bluewater District School Board
Alecia Lantz, Bruce-Grey Catholic District School Board

From: [Kyra Dunlop](#)
To: [REDACTED]
Cc: [Council](#); [SMT](#); [Town Clerk](#); [Planning General](#)
Subject: FW: Comments on Proposed Official Plan Draft Objectives and Policies Changes
Date: September 30, 2024 8:55:37 AM
Attachments: [image001.png](#)
[image003.png](#)

Hi Jim,

I acknowledge receipt of your below comments regarding the October 1, 2024 Council Public Meeting: Official Plan Review and confirm I am copying Council and staff to review same for information. Your comments will be summarized and read aloud at the public meeting, and included in the followup staff report.

Thank you,

Kyra Dunlop

Deputy Clerk, BA (Hons)

Town of The Blue Mountains, 32 Mill Street, P.O. Box 310, Thornbury, ON N0H 2P0

Tel: 519-599-3131 ext. 306| Fax: 519-599-7723

Email: kdunlop@thebluemountains.ca | Website: www.thebluemountains.ca

As part of providing [accessible customer service](#), please let me know if you have any accommodation needs, require communication supports or alternate formats.

From: Jim Oliver [REDACTED] >
Sent: Friday, September 27, 2024 6:18 PM
To: Town Clerk <townclerk@thebluemountains.ca>
Subject: Comments on Proposed Official Plan Draft Objectives and Policies Changes

I have followed the process of reviewing the Town's official plan and updating its policies with interest over the past couple of years, and applaud the efforts of Council and staff to make changes that reflect our Town's realities in 2024 and beyond. The issues of climate change, housing costs and lack of affordable housing, protection of prime agricultural and natural area lands require new approaches to land use and land use controls.

I have reviewed the 6 summary documents (under The BluePrint Official Plan Review) providing draft policy changes/additions, and found them clearly presented and

substantive in content and new direction. I am providing the following brief comments for Council's and staff's consideration as the process continues:

Sustainability, Parks and Recreation;

Policies stating the need to encourage/ensure the co-location of parkland with educational and/or recreational facilities should also emphasize the need to create active transport linkages between same, in other words the Town's trail networks can and should be seen as transport corridors linking all of the above community asset types.

I strongly support the objectives for sustainable development and climate change action. Rather than simply "encouraging" the use of green development standards, policies should "ensure" that they are utilized through means such as local building code requirements and incentives for developers and even individual home builders/buyers.

Updating policies to encourage compact, higher-density, etc. developments, should also recognize the need to reduce the maximum lot occupancy for single-family residential development from its present level of 30%.

Housing Mix and Affordability;

Policies dealing with both the mix of housing types needed and affordable/attainable housing should ensure that housing designs provide a reduced "carbon footprint", and thus a reduced contribution to global warming. Such designs should be incentivized by the Town through such things as reduced building permit fees, and even reduced property tax levels (or rebates).

Intensification and Density;

I strongly support the proposed policies and objectives presented in this summary document, including the provision of taller residential and mixed-use buildings up to 5 storeys along hwy. 26 within Thornbury's downtown area. The policy requiring a minimum 12 metre setback (from the front property line) for new buildings along Hwy. 26 is not practical for some of the properties in the urban areas of Thornbury. While I support the policies increasing the maximum densities for development, I continue to feel the Town should consider reducing the maximum lot coverage percentage for single family residential lots.

Transportation;

I support the draft policies and objectives presented around transportation and more specifically active transportation.

I appreciate the opportunity to provide comments on the proposed policy revisions in the official plan, and encourage the Town to complete the updates as soon as possible.

Jim Oliver



September 27, 2024

SENT BY EMAIL

Town Clerk townclerk@thebluemountains.ca
Town of Blue Mountains
32 Mill Street
Thornbury, ON N0H 2P0

**RE: Town of Blue Mountains Draft Updated Official Plan
Public Meeting October 1, 2024
NVCA Review Comments
NVCA ID #18956**

Thank you for the opportunity to comment on the draft of the updated Town Official Plan dated September 2024.

Nottawasaga Valley Conservation Authority (NVCA) staff provide the following comments focused on our mandatory interests including, but not limited to, natural hazards (flooding, erosion, etc.) and source water protection. Natural hazards also include wetlands and stormwater management plans as far as they constitute an integral component of natural hazard management.

The NVCA provides the following comments:

A3.1 Sustainable Development
A3.1.2 Strategic Objectives

- Recommend adding the following to the list of strategic objectives:
 - "Ensure all development and site alteration is directed to lands not subject to natural hazards, including wetlands."
 - Alternatively, this strategic objective could also be included in Section A3.2.2.

A4.3 Environmental and Open Space Designations
A.4.3.2 Hazard Lands

- Recommend referencing other wetlands and karst topography (currently referenced in Section A4.3.4) in Section A4.3.2 as these features constitute hazardous sites that could be unsafe for development and site alteration.

B5.2 Natural Heritage Features

- In regards to paragraph 3, please be advised that the Conservation Authorities will have a limited roll to play in the identification of natural heritage features as a result of changes to the *Conservation Authorities Act* and our mandate.
- In Section B5.2.1 b) suggest also including reference to other wetlands.
- With respect to the table and reference to the 120m setback from provincially significant wetlands, we wanted to advise that based on changes to the *Conservation Authorities Act* and through Ontario Regulation 41/24, the Conservation Authority is now only able to regulate development and site alteration within 30 metres of all wetlands.

B5.3 Wetlands

- With respect to Section B5.3.2 b) Development Policies, the Conservation Authority is now only able to regulate development and site alteration within 30 metres of a provincially significant wetland.

B5.4 Hazard Lands

- Recommend referencing other wetlands and karst topography in this section as these features constitute *hazardous sites* that could be unsafe for development and site alteration.
- Recommend that Section B5.4.2 b) Development Policies be revised as follows:
 - b) No buildings or structures are permitted within *Hazard Lands*, except for the following subject to approval by the Conservation Authority:
- Recommend that the last sentence of Section B5.4.2 h) Development Policies be revised as follows:
 - The access will generally require approval from the appropriate *Conservation Authority* under Ontario Regulation 41/24 (Prohibited Activities, Exemptions and Permits).

C2 Watercourses

C2.1 Function of Watercourses

- Suggest revising the final paragraph to refer to the Ministry of Environment, Conservation and Parks as the authority responsible for reviewing water taking applications and issuing permits to take water under the *Ontario Water Resources Act* and its Regulations.

C3 Floodplain Planning

- Section C3 a) – Recommend removing “, pollution or conservation of land”. As a result of changes to the *Conservation Authorities Act* and its Regulations, Conservation Authorities no longer regulate development in relation to pollution or the conservation of land.
- Section C3 c) – Recommend revising “an Environmental Impact Study” to “a Natural Hazards Assessment”
- Recommend adding the following paragraph at the end of Section C3 c):
 - The appropriate Conservation Authority should be consulted to confirm the limits of the natural hazards associated with these watercourses and for permitting requirements within regulated areas under the Conservation Authorities Act.

C4 Ground and Surface Water Resources (Sourcewater Protection)

C4.3 General Policies

- Section C4.3 a) - A portion of the Town is subject to the South Georgian Bay Lake Simcoe Source Protection Plan which took effect July 1, 2015, with the remainder of the Town being subject to the Saugeen, Grey Sauble, Northern Bruce Peninsula Source Protection Plan which took effect July 1, 2016. It is recommended that this section be revised to reference these two approved Source Protection Plans.

C6 Hazardous Slopes

- Recommend that the first sentence of Section C6 b) be revised as follows:
“*Development* shall be sufficiently setback from the top of bank of slopes greater than 1V in 3H.”

C12 Shoreline of Georgian Bay

- Section C12, first paragraph - Recommend replacing “Ontario Regulation 151/06” with “Ontario Regulation 41/24”. Ontario Regulation 151/06 has been revoked.

D4.2 New Lots by Consent

D4.2.1 General Criteria

- Request that a new Section D4.2.1 g) be added to read as follows: “will not be subject to flooding hazards, erosion hazards, dynamic beach hazards, or be located within *hazardous sites*.”

E7 Amendments to this Plan

- Section E7 d) - Recommend adding "Natural Hazards Assessment" to the list of potential supporting information.

Conclusion

NVCA staff appreciates the opportunity to comment on the draft Official Plan at this stage in the process and look forward to continuing work with the Town on this update.

If you have any questions regarding the NVCA's comments, please do not hesitate to contact the undersigned.

Please circulate the NVCA with a copy of any future Notices related to the update of the Town's Official Plan at planning@nvca.on.ca

Sincerely,



Greg Marek, RPP, MCIP
Senior Planner
E: gmarek@nvca.on.ca
P: 705-424-1479 x242

Copy: County of Grey – planning@grey.ca
Ben Krul, Manager, Development Planning and Permits - NVCA

**October 1 Public Meeting on Official Plan, Town of Blue Mountains
Concerns Regarding Building Heights in Thornbury Downtown
Sandra Banks, Thornbury**

We have serious concerns about proposed changes to the Town's Official Plan as it relates to building heights in downtown Thornbury.

The draft tracked changes under *B2.13 Building Heights* propose the following:

"Compatible intensification up to five (5) storeys is encouraged within the Downtown Area designation in Thornbury, generally along Highway 26 (King Street East/Arthur Street West), but outside of the low-rise Thornbury downtown core. For the purpose of this Plan, the Thornbury downtown core consists of properties within the Downtown Area designation along Bruce Street."

It is hard to imagine that the Official Plan only recognizes two short blocks in Thornbury as worthy of the designation of low-rise downtown core. The prospect of a suburban corridor of five storey buildings along King and Arthur streets (Highway 26) will irreversibly change the unique character, experience and "livability", such that within five to ten years current residents will not recognize the historic downtown.

Therefore, Council must consider three important changes to the current draft of the Official Plan.

First, designate Bruce Street and Highway 26 (King Street East and Arthur Street West), from Wellington to Victoria streets, as low-rise Downtown Area in Thornbury.

- Here, maximum building heights up to 3 storeys would be allowed from Wellington to Victoria Streets. Like Bruce Street, there are historic elements and original low-rise neighborhoods as well as greenspaces on either side of Highway 26.

Second, adopt the recommendation of Blue Mountain Ratepayers Association (BMRA) for TBM (shared with Town staff in February and broadly again in April):

- This includes three storey buildings as the norm, with a maximum four storeys -- only where there is a significant benefit for housing attainability. BMRA notes that a maximum of five storeys would be relevant in areas such as Blue Mountain Village.

And third, other references in the draft OP referring to Downtown Area designation in Thornbury should be changed to reflect these recommendations.

- Any reference to the low-rise Downtown Area designation should include the areas along Highway 26 (King/Arthur Streets) from Victoria to Wellington Streets, such that only beyond these points would four storey buildings be considered.

The public engagement survey released by TBM in August 2023 showed strong support for low to medium density in defined areas but not overwhelming support for buildings over three storeys. There was very strong support also for the goal of maintaining the small town, original character of Thornbury. When asked specifically, about support for various building heights, survey responses for question 17 included:

- 39.6% supported 3 storeys or less;
- 18.4 % supported 4, 5 or 6 storeys.

Other Comments

Under the current, proposed changes in the Official Plan for Building Heights, Highway 26 in Thornbury will become even more congested with vehicular traffic. The neighboring homes and greenspaces, especially along the Georgian Trail and park, will have expanded vistas of tall and larger buildings and parking lots to observe from either side of Highway 26. Rather, the Georgian Trail, neighbourhoods and homes backing onto Highway 26 should continue to exist as part of the low-rise Thornbury downtown core.

There are several examples in the OP proposed changes that purport to serve as “checks and balances”, ensure compatibility as well as other references that speak to preserving the character of the Town of Blue Mountains.

While it is important to acknowledge the intent of this language, it is unclear how TBM would enact or enforce successfully the multiple “checks and balances” against non-compatible building heights recommended in the draft Official Plan.

Managing building heights in the downtown core area of Thornbury is the most impactful means of protecting and preserving the character, heritage and small town attributes of Thornbury.

To: The Blue Mountains Town Clerk, townclerk@thebluemountains.ca

From: Janet Findlay, 320 Sunset Boulevard, Thornbury

Date: September 29, 2024

RE: Official Plan Review, Public Meeting October 1, 2024

As a former board member of The Blue Mountains Attainable Housing Corporation, (BMAHC) I would like to provide the below comments on the proposed Official Plan changes that will impact the Highway 26 corridor in Thornbury. BMAHC was responsible for undertaking the planning and costing of purpose built rental housing at 171 King Street East (Highway 26) in Thornbury.

Height

I support a change in allowable height along Highway 26 from 3 storeys to 4 storeys, except for the section between Victoria and Wellington Streets. A height of 4 storeys for the proposed King Street East property, which is outside this section, was recommended by a BMAHC-sponsored design task force in 2021. The task force was guided by MHBC (Planning Urban Design and Landscaping) Consultants and made up of community representatives who reached agreement on a 3-storey section facing King Street with a stepped back section of 4 storeys. This model was approved by the BMAHC board with all directors voting in favour, although later a decision was taken to accelerate the project by conforming to the existing 3 storey Official Plan and Zoning Bylaw designation.

Setback from King Street (Highway 26)

The task force also specified that the setback from King Street should be greater than 3 metres, to allow for the provision of landscaping at the front of the site. A setback of 12 metres along Highway 26 for taller buildings, now recommended by O.P Review consultant SGL, is a welcome change. Currently the Town requires all buildings to be sited at the edge of King Street. I support the revised policy recommendation as it will help to maintain and enhance the open space character of the Town and reduce the impact of the taller height.

Ground Floor Commercial

The proposed O.P. Review policies encourage mixed use buildings on main streets within the Downtown Area. This approach, which requires a commercial function on the ground floor while providing for a range of housing options above, is commendable; however it should be revised to allow ground floor residential uses facing away from the street on properties with suitable depth. The proforma developed for the proposed rental housing at 171 King Street East was compromised by the O.P. restriction of only commercial uses on the ground floor. The fact that the property has significant depth led to a concern with respect to the viability of a large commercial component on this site, as well as to a concern about the amount of commercial parking to be accommodated.



September 30, 2024

Mr. Adam Smith
Director, Planning and Building Services
Town of The Blue Mountains

VIA EMAIL ONLY

Dear Mr. Smith,

**RE: Town of The Blue Mountains
5 Year Review Comments
Craigleith Waterfront Development Inc
(Royalton-Aquavil)**

Your files will show that we are the Planning Consultants of record, working with Royalton Homes to assist with land use planning matters on their Aquavil project located at 209843 Hwy 26. Please accept this letter in response to the September 2024 Draft Official Plan. By copy of this we are advising the Clerk of submission of these comments and, request we be notified of future public meetings and decisions regarding the Town's Five-Year Review of its Official Plan.

The following are our comments on the September 2024 Draft Official Plan:

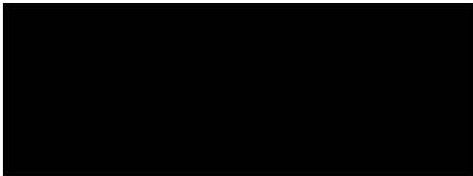
1. Schedule 'A-4' in the Draft Official Plan retains the land use designations applicable to the subject lands. In this regard, there are no concerns.
2. Constraint Mapping Appendix 1 shows existing identified wetland and woodland constraints. However, my client is currently reviewing two minor boundary matters in light of completed environmental studies and may comment further on this matter.
3. Section B3.12 proposes, for the most part, to retain existing land use policies. The relative minor additional policy wording added to this section do not raise a concern.
4. Policies regarding transportation and servicing generally do not raise a concern. However, my client's engineers may assist in providing commentary in the near future.

5. Section D7 proposes additional policies covering affordable and attainable housing. My clients appreciate that many of these additional policies attempt to address this sector of the housing market. However, we are further reviewing some of the implementation prescriptions and may provide additional commentary in the near future.
6. Section E7 proposes a few delegation tools in an effort to streamline the approval processes for planning matters of a "minor" nature. This initiative merits support.
7. Approvals and development agreements have been executed for both the Blue Vista (County Road 21) and Aquavil (Highway 26) projects. My clients will be requesting a review, with Staff, of some of the proposed implementation policies in the context of the existing approvals and agreements status of their projects.

For the most part the proposed Draft Official Plan retains existing land use policy and directions applicable to my client's projects. There are a few implementation related details and questions particular to their projects that we will be reviewing further with Staff.

In the meantime, we appreciate the opportunity to comment on the Draft Official Plan and look forward to the next steps.

Yours truly,



Travis & Associates
Colin Travis MCIP RPP

Cc: Owner: c/o Royalton, att: S. Chaaya
Town of The Blue Mountains: Corrina Giles, Shawn Postma

Shawn Postma

From: Blake Roussell [REDACTED]
Sent: October 1, 2024 4:40 PM
To: Shawn Postma
Cc: Paula Hope; June Porter
Subject: Feedback on the Official Plan recommendations

To whom it may concern,

It has come to my attention that a minimum set back of 150 metres is being recommended for Cannabis Production Facilities from Sensitive Uses in the Official Plan. Considering that would apply to our facility and any uses that are proposed near us, I would recommend at least 300 metres as a recommendation for the minimum set back.

The issues that would be of concern to us and that may become a nuisance for our neighbours are the following:

1. **Noise** - Our Air Make Up and Air Handling units generate noise for AC, heating and ventilation 24 hours per day and can be heard at night when it is quiet for a considerable distance; Vehicle traffic in the future will be seven days per week and all hours of the day and night, from our employees coming to and from work, garbage/recycle removal, truck traffic, snow removal, etc.
2. **Light Emissions** - High intensity lighting on our buildings for security at night-time generates light for a considerable distance from our building as they are placed all around the perimeter of our building at a height of twenty feet.
3. **Waste Incineration** - The waste from our cannabis cultivation is disposed of outside the back of our building using an incinerator that burns the waste and generates smoke and odour, which may occur at any time of day or night, as necessary.
4. **Security** - Cannabis production regulations require high security measures to be implemented for obvious reasons and the concerns with having homes and people so near to our facility to monitor our operations and have the opportunity to possibly gain access would be of great concern to us. We may even have to ensure security guards are present at all times to prevent any issues.

We have deliberately built our facility where we have to ensure that our facility is away from view and not easily accessible, so it would be greatly appreciated if we could have these issues considered when finalizing the Official Plan for the minimum set back. We feel that 150 metres would not be sufficient in our situation and we would not want to become a nuisance for our future neighbours.

Please feel free to contact me if you have any questions or if you would like to discuss any of the issues identified.

Kindest regards,

Blake Roussell
Chief Executive Officer

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]



October 1, 2024

To: The Mayor and Members of Council
Town of the Blue Mountains

From: Blue Mountain Ratepayers Association, Planning Subcommittee
Contact: Brian Nelson bjnelson100@gmail.com

Re: **Official Plan Review Public Meeting, October 1, 2024**

BMRA will be providing a detailed written submission following the Public Meeting of October 1, 2024. These comments are intended to highlight key points:

The OPR process:

- BMRA has been fully engaged in the OPR process. We have reviewed all Phase 1 Background Reports, the proposed Phase 1 OP updates, all Phase 2 Recommendations Papers and, most recently, the Phase 2 proposed updates. We have submitted comments at every opportunity.
- Public engagement for Phase 2 has been extremely compressed. The Recommendations Papers were somewhat helpful but too general to enable a meaningful review of policy recommendations. The proposed Phase 2 updates were released just three weeks prior to the Public Meeting. A summary of earlier public comments and submissions, normally provided for public review, is not yet available.

Growth Management:

- Our comments are submitted in the context of the fact that TBM is a small municipality confronting unprecedented growth pressures. Public concerns about growth in neighbourhoods and communities across our Town are also unprecedented. Residents are raising serious and legitimate questions about growth and pushing back, justifiably, on what appears to be a pattern of development that would be more appropriate in the GTA than TBM. We are currently accepting or considering far more growth, at a far faster rate, than is reasonable or sustainable for a municipality of our size.
- We are at a critical time. We either accept excessive and poorly controlled growth and watch as we lose the unique qualities that make TBM so attractive to both residents and visitors, or we restrict and manage growth carefully to protect and enhance the livability, functionality, and sustainability of our Town.

Vision, Guiding Principles, Goals and Strategic Objectives:

- These sections of the OP provide a solid general policy framework for TBM growth and development. At this general level, we support the policies in these sections, including proposed updates. There are gaps and weaknesses in the OP, but these are related primarily to implementation, clarity, and enforcement. Our recommendations focus on translating principles into practice. Examples include:

Intensification:

- We support OP policies that ensure carefully managed intensification within settlement areas to use infrastructure efficiently and build compact communities with affordable and attainable housing options and services that are accessible to all residents.
- TBM currently has ample land for development within settlement areas and ample opportunities for intensification – confirmed by background studies on growth and intensification prepared for Phase 1. We can meet all growth targets and population forecasts, and achieve our housing goals, with a carefully managed intensification strategy that ensures compatibility with existing communities, and without major increases in building heights or densities.

Building Height and Density:

- We support maintaining the maximum of height of 3 storeys in the Downtown Core of Thornbury along Highway 26 from Victoria Street to Wellington Street, as well as along Bruce Street. A maximum of 4 storeys should be considered along Highway 26 in Thornbury outside of this area, and in the Craighleith Village Community, provided that the proposed 12 to 16 metre setbacks from Highway 26 and the 45-degree angular plane from lot lines are approved and strictly enforced. These setback parameters must be embedded in Building Height policies and the associated criteria. OP policies must state clearly that any proposal to exceed 3 storeys outside of these designated areas will require an Official Plan Amendment.
- We do not support 5 storey buildings except where already permitted in the Blue Mountain Village Resort Area.
- We will be recommending reductions to the proposed density increases to ensure compatibility.

Community Design Guidelines:

- Updated Community Design Guidelines are essential and must be prepared and approved prior to approval of the OP updates. Policies addressing Building Height, Intensification Criteria, and Greenfield Criteria must be clearly linked to updated Community Design Guidelines.

Protection of Natural Heritage Features and Agricultural Lands:

- Intensification and efficient land use requires stopping costly and inefficient sprawl. This requires protecting our valuable agricultural lands, and our unique natural heritage features, including wetlands, watersheds, woodlands, tree canopy, and other natural assets. Again, the principles, goals and objectives in our OP are strong, but there are gaps in the detailed policies supporting implementation and enforcement. The need to fully integrate findings from the Natural Heritage Study and Natural Asset Inventory into the OP, for example, is urgent. Completion of the Natural Heritage Study and Natural Asset Inventory by including Settlement Areas and updating relevant OP policies, is an additional top priority.

Public Engagement:

- We will have more detailed recommendations on the application of implementation tools such as Zoning and a Community Planning Permit System. We'll be continuing to advocate for public engagement, and a thorough understanding of and response to our local needs and priorities.

Public Meeting on Official Plan, October 1, 2024

Agenda item B.2 Public Meeting: Official Plan 5 Year Review

Comments on Building Heights in Thornbury

I write in support of the recent statement by the Blue Mountain Ratepayers Association regarding recommendations for building heights in Thornbury.

It makes sense to maintain three storeys as the norm, including in the downtown low-rise area, which should include Highway 26 from Wellington to Victoria Streets.

I don't support the current proposal to encourage five storeys along the stretch of highway 26 that runs through Thornbury. As per the recommendation from BMRA, four storey buildings could be considered on highway 26 outside of the downtown lowrise core, i.e. east of Wellington Street and west of Victoria Street.

Thank you for the opportunity to provide comments.

Bruce Taylor

██████████

Shawn Postma

From: Web Committee
Sent: October 1, 2024 5:38 PM
To: Planning General; Shawn Postma
Subject: Webform submission from: Contact the Official Plan Review

Submitted on Tue, 10/01/2024 - 17:37

Submitted by: Anonymous

Submitted values are:

Name:
Joanne de Visser

Email:
[REDACTED]

Share your feedback regarding the Official Plan Review:

Please accept this submission of feedback for the Official Plan Review - as a Resident of the Town of the Blue Mountains.

For complete transparency, I am a member of the Blue Mountains Public Library Board.

Recommendation: Expand the inclusion of Libraries and library services in the Town of The Blue Mountains Official Plan

Beyond being listed as a potential 'institutional land use'; the Official Plan does not formally acknowledge the inclusion of a library (or museum and archives) as part of the overall Town priorities and land use for healthy communities and service delivery.

On November 30, 2023, The Library Board presented an initial overview of the Social Return on Investment valuation being undertaken for the Blue Mountain Public Library (TBM). In this presentation, the following areas of value delivery to communities by libraries in Ontario were outlined: Education, Culture, Inclusion & Wellbeing, Entertainment & Leisure, Economic Development, Civic Engagement and Space. These factors are direct contributors to the Town Vision.

TBM operates as a Gallery, Library, Archives and Museum model; the buildings – LE Shore and Craigleith Heritage Depot along with any future expansions, enable delivery of services on a spectrum of aspects central to the quality of life in The Blue Mountains.

The role of Public Libraries is directly in support of the purpose of the Official plan:

“... for managing growth that will support and emphasize the Town’s unique character, diversity, civic identity, recreational and tourism resources, rural lifestyle and heritage features and to do so in a way that has the greatest positive impact on the quality of life in The Blue Mountains. “

By limiting the Library to a generic potential as 'institutional use', we limit the possible inclusion of libraries -and the ability to expand services as our community grows - in areas throughout our community. Whether it is part of a recreational facility, parkland (outdoor libraries in season), arts and culture use, economic development area etc.

Some suggestions for where to include Libraries/GLAM are:

1. A1 THE COMMUNITY VISION AND GUIDING PRINCIPLES

In the list under the two principles of Planning (page 5),

- “...On the basis of the above, The Blue Mountains is a community that should continue to:..”
Provide accessible library services and resources to facilitate healthy and complete communities for residents of all ages, backgrounds and abilities *
Provide responsive and appropriate library, arts, cultural and recreation services to current and developing neighbourhoods*
2. Include Libraries/Library services in all instances where Arts and Culture and Recreation are mentioned
 3. Add Libraries/Library services to the definitions of Arts and Culture, Recreation and Leisure, Urban Character sections.
 4. Add libraries as a possible use to all land use designations (except Environmental and Open Space Designations)

*These have been adapted from the District of North Vancouver Official Community Plan
Additional examples of how and where/how to include Library can be found in the Innisfil Official Plan (ref link) and the District of North Vancouver Official Plan (ByLaw 7900 August 2024. Reference link)

Respectfully Submitted
Joanne de Visser

I would like a copy of my submission sent to my email address.

Yes

Any accompanying files are attached.

Official Plan Review Public Meeting, October 1, 2024

Public Comments – Paul Reale

1. Height and Density along Highway 26

Allowing 5 storeys could bring in too much density, altering the small-town character of Thornbury. Alternatives like capping at 3 storeys with stricter design controls should be explored to preserve the town's feel and manage traffic flow effectively.

Questions:

- a) Why is a 5 storey limit being considered when surveys show the majority of the residents don't want them?
- b) How will increased traffic be managed with this higher density?
- c) Can 3 storeys be prioritized instead, with stricter design criteria?

2. Lack of Specifics on Infrastructure

There are few specifics on how the town's infrastructure will cope with this increased density. Clear, enforceable policies are needed to ensure that development aligns with infrastructure capacity.

Questions:

- a) What plans are in place to ensure infrastructure supports increased density?
- b) How will the Town ensure that infrastructure policies are enforced and updated to match development?

3. Affordable & Attainable Housing

Relying on height and density alone is not a sufficient solution. The plan needs clear mechanisms and incentives to ensure developers include purpose-built affordable and employee housing in new projects.

Questions:

- a) How will the Town ensure that new development includes the purpose-built affordable and employee housing?
- b) What specific incentives are being offered to developers for affordable housing?

4. Growth Management

The plan encourages high-density growth without clear safeguards to protect natural assets, such as wetlands and woodlands, or to maintain service levels. More concrete restrictions are required to manage sprawl and preserve the town's natural resources.

Questions:

- a) How will the Town manage sprawl to protect natural resources and ensure proper service levels?
- b) How does the plan address the protection of natural assets like wetlands and woodlands?
- c) What safeguards will be put in place to restrict growth in sensitive areas?

5. Lack of Secondary Planning

The lack of secondary planning policies leaves a gap in guiding development in Thornbury West, especially with the Campus of Care opening up a future secondary plan area. Clear timelines and structured guidelines are essential to plan for future growth and ensure that

Question:

When will secondary planning policies be established to guide future development in Thornbury West?



GEORGIAN TRIANGLE DEVELOPMENT INSTITUTE

Adam Smith

Director of Planning and Development Services
Town of The Blue Mountains, 32 Mill Street, P.O.
Box 310, Thornbury, ON N0H 2P0
Tel: 519-599-3131 ext. 246 | Fax: 519-599-2093

Dear Mr. Smith,

RE: Town of The Blue Mountains - 5 Year Review Comments

Incorporated in 1992, the Georgian Triangle Development Institute (GTDI) is a private sector non-profit organization which represents the Development Industry within the South Georgian Bay Region. Our members include developers, builders, contractors, suppliers, planners, engineers, real estate firms, and related industry businesses within the Georgian Bay Area.

Please accept this letter as our initial comments on the September 2024 Draft Official Plan. This draft was made available through the Town's web site in early September. We are submitting this letter at the October 1, Public Meeting to advise the Town of our preliminary comments. In the meantime, we are continuing our review and anticipate a detailed review to be submitted to Town Planning Staff in the near future. Our preliminary comments are as follows:

1. The GTDI supports the Town's efforts to update its 2016 Official Plan and commends the amount of effort that has resulted in the September 2024 Draft Official Plan.
2. The Planning Act (Section 17) is the enabling legislation governing municipal Official Plans: purposes, contents, processes. This enabling legislation informs a significant context for the industry commentary.
3. On the whole, the Draft Official Plan retains many of the existing Official Plan policies. However, it is acknowledged there are several key revisions and updates that reflect the more recent updates to Provincial planning legislation and policy direction. In addition, it is recognized that many proposed policy and policy directions represent guidance from Council. The following is a summary of the GTDI initial comments:
 - a. The introductory population and household context requires corrections and clarification on some of the numbers and how they were arrived at.
 - b. Section A3 has several "Strategic Objectives" that are not objectives for the purposes of the Plan, but generalized policy directions.

- c. Section D introduces several detailed policies addressing Affordable and Attainable Housing. While the GTDI welcomes additional policy guidance on this important land use matter, there are a few proposed directions that require clarification and, a few prescriptive directions that represent significant implementation issues for both the Town and the development community.
 - d. Section E1 introduces several new implementation directions and requirements. There is a new direction seeking “streamlining” of process that warrants support and implementation. There are other sections that may prove problematic with regards to the Planning Act and, may counter any proposed measures to streamline process.
4. The GTDI continues its review and is preparing detailed comments that are both technical and policy in nature and expand upon the above-noted areas.

The comments provided above are general in nature. We are in the process of preparing more detailed feedback, which will be submitted to the Planning Department. Our goal is to offer constructive feedback from the industry perspective and collaborate with the Town to develop an Official Plan that benefits the entire community.

Yours Truly,

Georgian Triangle Development Institute (GTDI)



CANN Comments on the Official Plan Review
Public Meeting – October 1, 2024
Sally Leppard on behalf of CANN's Official Plan Sub-Committee

Climate Action Now Network (TBM)

We are a volunteer group in the Town of The Blue Mountains –Our Goal is to reduce the carbon footprint of the area, and work together towards a more sustainable community.

Formed in 2019. Supported the Town in declaring the Climate Emergency. Climate mitigation and adaptation, environmental protection, conservation and enhancement are top priorities for the residents within this Town.

The Declaration of the Climate Emergency states, in part:

“That this Council will direct staff, through the strategic planning and budgeting processes, capital investments – to decrease dependence on fossil fuels. “

This declaration **MUST** be taken seriously.

We continue to expect **strong** leadership. And **ambitious** action. The Official Plan is the guiding document that provides direction and policy regarding land uses in this Town.

Climate Change mitigation and adaptation cuts across all aspects of land use. From determining where land uses should be located, to the level of site plan control. Over the last few years, our Town has experienced: dramatically fluctuating water levels in Georgian Bay, overflowing storm sewers, flooded basement, extreme heat, severe storms.

At the local level there is a lot we can and must do. **WE MUST PLAY OUR PART. THERE IS NO ROOM FOR COMPROMISE.**

As such, it is of the utmost importance that Climate Change Mitigation and Adaptation measures are embedded and enforceable throughout this plan.

Email: canntbm@gmail.com Facebook: [Climateactionnownetwork](#) Instagram: [gogreen4blue](#)

CANN has been an active participant in providing substantial input into this Official Plan – from the Update stage, to this Review.

We have waited patiently to see how our comments have been incorporated. We expected the OP would DIRECT and MANDATE how to build our Town’s resilience and community safety against the impacts of severe climate change impacts.

Our General Comments:

After reviewing almost 400 pages of text and maps, these are our general comments on this draft. We are submitting a detailed, section by section review of the document, within the next few days.

INTRODUCTORY SECTIONS:

- The Plan has many good intentions. Sections have been added like in the strategic objectives. But this is 2024 – so we expect this. But this Plan must last us for the next 10 years, and sets the stage for the next 25 – **we need more than good intentions.**
- The words provide guidance. Climate mitigation measures are generally optional. But we have the knowledge, technology, best practices to be BOLD - there is no reason to be meek and shy.
- The Vision and Principles were relied upon in “preparing” the Official Plan. But the language is silent when it comes to the revised document. While they need strengthening, the Principles must be relied upon in the body and language, and clearly connected to the goals and objectives of each relevant land use. In particular, they must be embedded in the implementation of the OP. A direct linkage must be provided. The INTENT of the climate change measures in this Official Plan must be clear, and not subject to the weakest interpretation.
- The Strategic Objectives are “nice” but they have no standing in the actual land use sections.
- There is no reference to the risks caused by climate change and how these will be mitigated at the local level.
- No reference to the Net Zero CO2 reduction target, and how it will be accomplished
- The plan’s description of our community focuses on the urban and tourism aspects of our economy. When agriculture is the largest land use and employer, and can make a significant positive contribution to climate change mitigation.
- While we are very supportive of The Sustainable Path (2010), we did expect The Future Story to be mentioned as well in the introduction, and its measures mandated throughout the text.
- There is no direction to endorse, follow and implement the Grey County Climate Action Plan

IN THE BODY OF THE DOCUMENT

- Where climate mitigation measures are mentioned, there is no firm direction. Terms such as “may”, “consider”, “promote” are used. THIS IS NOT AMBITIOUS. These terms need to be replaced with “Mandate OR REQUIRE.

- Environment and Open Space Policies need to be strengthened – incorporate the Natural Heritage Study and Natural Asset Inventory and include targets to map and protect these most valued resources.
- Where is the tree protection, forestry protection? Where are the targets for urban canopy cover and natural services protection?
- No mention of the Town’s Energy Conservation and Demand Management Plan – which sets targets – no mention of the need to update this
- Need to implement Green Development Standards

And

- The implementation section needs to describe how to IMPLEMENT the Climate Action across all relevant land uses
- We question how the Community Planning Permit by-law will be developed – does it overturn these policies and land uses? How will the boundaries be defined?

In Summary,

CANN’s comments are very similar to those we have been consistently making. The Climate Action needs to be **ambitious not meek**. The Language has to be **STRONG not WEAK**. The knowledge and technology exist. Best practices exist. We expect strong leadership in this Official Plan.

We will be submitting detailed comments with suggestions for changing the language in the Official Plan to strengthen it.

Our question to you is:

Are you willing to seriously consider strengthening the Official Plan to PROTECT our area by – mandating the conservation and protection of natural areas, utilizing nature-based solutions, and directing the Town, and community developers and builders to implement net zero practices?

Thank you.

CANN! We are a volunteer group in Town of the Blue Mountains. Our goal is to reduce the carbon footprint of the area and work together towards a more sustainable community.

Shawn Postma

From: Corrina Giles
Sent: October 3, 2024 11:13 AM
To: [REDACTED]
Cc: Council; SMT; Shawn Postma; Karen Long; Kyra Dunlop
Subject: RE: Provincial-Planning-Statement-2024-1.pdf

Good morning Julie,
I acknowledge receipt of your email below in response to the Official Plan Review. By way of copy, I have forwarded the same to Council for their information and consideration, and confirm your comments will be included in the followup staff report regarding this matter.

Kind regards,



Corrina Giles, CMO

Town Clerk

Town of The Blue Mountains, 32 Mill Street, P.O. Box 310, Thornbury, ON NOH 2P0

Tel: 519-599-3131 ext. 232 | Fax: 519-599-7723

Email: cgiles@thebluemountains.ca | Website: www.thebluemountains.ca

From: Julie Tipping [REDACTED]

Sent: Wednesday, October 2, 2024 12:07 PM

To: Corrina Giles <cgiles@thebluemountains.ca>

Subject: Provincial-Planning-Statement-2024-1.pdf

Corrina: I think this should be put, at the earliest convenience, as a document for council consideration. As a tax paying full time community citizen one would question why so much money has been spent, including a consultant, on our Official Plan and why our municipality and planning staff don't seem to think that the Ontario government's document should be adhered to. This document is not being activated until Oct. 20, 2024 and the Greater Golden Horseshoe, which we aren't part of, is still in place until that date.

Council, Mayor, and staff should be made aware of this document with explanations of why they are updating the official plan so quickly when this document has yet to be activated.

Thank you.
Julie Tipping

<https://www.osler.com/wp-content/uploads/2024/08/Provincial-Planning-Statement-2024-1.pdf>



October 3, 2024

Town of the Blue Mountains Council
(c/o Corrina Giles, Town Clerk)

And

Shawn Postma, MCIP, RPP
Manager of Community Planning
Town of the Blue Mountains
32 Mill Street, PO Box 310
Thornbury, ON, N0H 2P0

**RE: Comments on Updated Town of the Blue Mountains Official Plan
BMR Group Inc. (BMR GP Inc. and Blue Mountain Building B Nominee Inc.)**

On behalf of BMR GP Inc. and Blue Mountain Building B Nominee Inc., please accept this letter as comments on the draft Town of the Blue Mountains Official Plan (September 2024) which has been released as part of the Official Plan 5 Year Review. They are the owners of the following lands in the Town of the Blue Mountains:

- Site B within the Village – currently owned by BMR GP Inc. and to be owned by Blue Mountain Building B Nominee Inc. following issuance of a certificate of official severance pursuant to file P2323;
- Site E/F within the Village – owned by BMR GP Inc.;
- Mountainwalk (Site C) – owned by BMR GP Inc.; and
- Monterra located at Monterra Road and Grey County Road 21 – owned by BMR GP Inc.

We note that the updates to the Town Official Plan generally seek to implement changes to planning legislation that have occurred over the last couple of years. Our comments on the draft Town of the Blue Mountains Official Plan update are as follows:

- 1. Affordable and Attainable Housing** – A number of new policies are proposed related to the provision of attainable and affordable housing and all of are concern. For example, policy D7.4 identifies that development proposals with more than ten residential dwelling units must provide affordable housing units, with the proposed amount to be greater than 30% of such units (since smaller developments will have no such requirement).

BMR GP Inc. and Blue Mountain Building B Nominee Inc. are concerned with the legality, practicality and planning merits of the policies as written. The Planning Act has a legislative regime in place for the provision of community benefits (the CBC) as well as for the imposition of extraordinary affordable housing requirements in areas where public funds have resulted in



FREED BLUE MOUNTAIN

significant property value increase (inclusionary zoning in the protected major transit station areas). There is, however, no general power for zoning by-laws to impose market pricing on land owners.

While it is good planning to establish affordable housing targets, the role of the official plan and the municipalities are to support these targets through establishing practical means to achieve such targets, including CBC credits, municipal housing incentive programs and other means (including municipal housing authorities, release of municipal lands for development, etc.).

As drafted, a blanket target requiring the that affordable units simply be subsidized by the remaining units in a development will not only fail to deliver sufficient affordable housing, but will, by its very nature, drive up the cost of the market housing as such units will either have to cover the cost of the affordable housing, or they will not be constructed (in either case, driving up the cost of all housing in the municipality).

We recommend that the municipality work with the housing industry to develop a thorough and comprehensive system to assist in the delivery of affordable housing. Furthermore, we recommend that the Official Plan be clarified so as to remove any requirement for affordable or attainable housing to be a component in resort residential or residential recreational developments (inclusive of commercial resort and village commercial resort uses), each of which have their own unique circumstances applicable to them.

- 2. Employee Housing Policies** – A new Policy B2.18 is proposed in the updated Official Plan related to Employee Housing. In particular, Policy B2.18 states that “employees, whether part time or full time, shall have the opportunity to access affordable and liveable employee housing”.

BMR GP Inc. and Blue Mountain Building B Nominee Inc. understand the importance of ensuring that workers within the Town are able to access housing. However, it is recommended that this policy be reworded to be an objective rather than a requirement, as BMR GP Inc. and Blue Mountain Building B Nominee Inc. have no way of guaranteeing access for all employees to affordable and livable employee housing.

- 3. Short Term Accommodation** - A new Short Term Accommodation Uses Policy is proposed under Section B2.5 of the updated Official Plan. It is recognized that the definition of short-term accommodation in the draft updated Official Plan excludes commercial resort units and village commercial resort units. The definition of short-term accommodation is as follows:

“Means a building or structure or any part thereof that operates or offers a place of temporary residence, lodging or occupancy by way of concession, permit, lease, license, rental agreement or similar commercial arrangement for any period less than thirty (30) consecutive calendar days, throughout all or any part of a calendar year. Short term accommodation shall not mean or include a motel, hotel, bed and breakfast establishment, tourist cabin or cottage, hospital, commercial resort unit, village commercial resort unit or similar commercial or institutional use.”



FREED BLUE MOUNTAIN

Provided this policy does not remove existing permissions for the operation of commercial resort units and village commercial resort units in the Village, which appears to be the case, BMR GP Inc. and Blue Mountain Building B Nominee Inc have no concerns with the introduction of this policy.

- 4. Access Policies** – D2.2.2 states that, *"Single access to new residential developments will be considered up to 85 units. New residential developments greater than 85 units will need to have two or more full accesses. Access to new residential developments will be considered through the phasing of the development however the above thresholds will be used to consider the design and phasing of the access. This policy shall not be interpreted to limit intensification on increased density; however, where the above standards for multiple accesses cannot be met, it shall be demonstrated that suitable and safe access can be provided to the satisfaction of the road authorities and emergency services."*

We recommend that this policy be changed from referencing a number threshold to referencing that "suitable access can be provided." The number is a technical standard that we do not support in the Official Plan.

- 5. Transition Policies** - From our review of the draft Town Official Plan, there do not appear to be any transition policies. It is recommended that transition policies be added to the updated Official Plan to recognize existing development approvals and to allow for implementing applications to proceed in a manner which is deemed to conform to the Official Plan.
- 6. Implementation Policies** – It is recognized that a number of policies have been added to Part E of the Town Official Plan related to implementation and administration of the Plan. Overall, the proposed enabling policies which will allow for the Town to implement new administrative processes and provide the increased ability for Staff delegation for some application types are positive and should assist with processing timelines.

With respect to Policy E1.8, additional clarification is requested on how the "minimum requirements" outlined in this policy are intended to function in relation to those requirements already prescribed under the Planning Act. From the wording of this policy, it is unclear if these requirements are in addition to public consultation requirements outlined under the Planning Act and to which development application types the requirements are intended to apply.

We would like to thank the Town for consideration of these comments, and should there be any questions, we would be more than happy to discuss with the Town.



FREED BLUE MOUNTAIN

Yours truly,



Teena Cole
VP of Development
BMR GP Inc. and Blue Mountain Building B Nominee Inc.

Shawn Postma

From: Manuel Rivera
Sent: October 4, 2024 8:41 AM
To: Shawn Postma
Subject: FW: Webform submission from: Contact the Official Plan Review

Hey Shawn,

We received another OP review enquiry regarding plan services in the Clarksburg area. Please see the previous email below for more detail and email chain history.

Thank you,

From: Web Committee <webcommittee@thebluemountains.ca>
Sent: Thursday, October 3, 2024 5:39 AM
To: Planning General <planning@thebluemountains.ca>; Shawn Postma <spostma@thebluemountains.ca>
Subject: Webform submission from: Contact the Official Plan Review

Submitted on Thu, 10/03/2024 - 05:38

Submitted by: Anonymous

Submitted values are:

Name:
Fiona Orr

Email:
[REDACTED]

Share your feedback regarding the Official Plan Review:

With regard to the review of the updated official plan, I attached correspondence which I previously had with the TBM related to the lack of any plan to service the town of Clarksburg. As noted in the correspondence, no steps have been taken of any substance since the EAA was done and filed in 2019 highlighting the importance of the issue, including, not even interim steps to include mandatory septic inspection given the findings of the report and the vulnerability of the drinking water in the Clarksburg area . Even the EA, as then stated that the lack of servicing made the town noncompliant with its own existing plan. Any update to this that is not fully tackled this issue one way or another is really simply Completely inappropriate and noncompliant. The official plan is now proposed to be updated simply continues to bury its head in the sand related to the pressing need for updated, and fulsome municipal serving requirements in the area of Clarksburg much less any new development or densification.

Thank you. Fiona Orr

Subject: in the absence of basic municipal serving plans, clarksburg needs a mandatory septic

inspection program - follow-up from Wastewater Master Plan PIC#1

From: Fiona Orr [REDACTED] >

Date: May 28, 2024 at 9:55:41 AM EDT

To: Allison Kershaw <akershaw@thebluemountains.ca>

Cc: Erica Dudley <edudley@thebluemountains.ca>, Tim Murawsky

<tmurawsky@thebluemountains.ca>, Alan Pacheco <apacheco@thebluemountains.ca>, Jason

Petznick <jpetznick@thebluemountains.ca>, Shawn Everitt <severitt@thebluemountains.ca>

Subject: Re: septic inspection program - follow-up from Wastewater Master Plan PIC#1

Hi Alison, thank you so much for your response as well as that of the input provided by Tim and his office.

Having briefly reviewed the response, I guess, I am therefore a little confused as to why Clarksburg would not move forward with implementing a mandatory inspection system of Septic beds and, perhaps as appropriate, well inspection given that it appears to me TBM has already has been designated by the town itself as part a mandatory area for “protection of source drinking water. “

I Will provide a current photograph of the sign posted on the Beaver river bridge in downtown Clarksburg, which I believe it’s been there for a while. City staff should already be fully aware of it given its prominence, and it would’ve been city staff who made arrangements to have the sign posted in the first place on the bridge leading into Clarksburg.

“What is a drinking water protection zone? A drinking water protection zone may be a wellhead protection area (WHPA) around a municipal well (groundwater source from aquifers) or an intake protection zone (IPZ) around a municipal intake (a surface-water source”

In addition, it’s my understanding that the area is under the authority of the grey suable conservation authority and septic bed permits will not be issued by the Town for the construction for a septic Bed system without prior approval by the authority.

Once again, highlighting the importance of the integrity of the drinking water in this protection zone.

As a reminder, and as I recall, the environmental assessment conducted for Clarksburg in 2019 stated of those Wells tested 28% contained some form of bacterial contamination. Also, back in 2019, a significant number of the septic beds in the community were identified to then be at or near the end of their useful life, which is typically 30 years.

Given the posted signage, and the EA report of 2019, while possibly unpleasant, I would suggest that the town has no alternative but to bring forward whatever appropriate next steps are to council to institute a complete and proper inspection of community water and waste water systems. I continue to refer to the six-year turnover inspection system currently done out of the township of Tiny across the bay as one example.

One takeaway from the meeting for the new master plan EA related to water and waste water needs for TBM held just recently is that based on current cost projections, and without more support from the province or other funding sources, the town is simply not financially able to proceed to install the preferred recommended option from the existing EA for clarksburg. Likely other areas as well. The least preferred option stated in the report from 2019 was to do nothing.

Given this, I would suggest it's appropriate for town to take additional next steps as soon as possible to protect the integrity of the protection zone of clarksburg drinking water sources, while it continues to explore any and all funding so that it can to expand Full services to the existing residents of Clarksburg Who continue to do without basic municipal services to already long established residential and commercial neighbourhoods.

I look forward to hearing from you or others as appropriate and I thank you for continuing to discuss this matter. I would be happy to help in anyway that I can.

Regards,
Fiona Orr
Sent from my iPhone

On May 27, 2024, at 2:59 PM, Allison Kershaw <akershaw@thebluemountains.ca> wrote:

Hi Fiona,

I'm following up with you regarding your question concerning septic inspection program. I reached out to the Town's Chief Building Official, Tim Murawsky for clarification.

The Ontario Building Code regulates mandatory and discretionary maintenance inspection programs for on-site sewage systems.

Mandatory programs apply to vulnerable areas that are located within a source water protection area, such as locations around municipal wells.

Discretionary programs are enacted by council and apply to inspections of every on-site sewage system within the entire Town of The Blue Mountains.

Since Clarksburg is not located within the source water protection area, and council has not enacted a by-law for the discretionary inspection of all sewage systems within the entire town, the town cannot enforce a requirement to inspect random properties.

Hoping this is helpful.

Respectfully,

image003.pngAllison Kershaw

Manager of Water and Wastewater Services

Town of The Blue Mountains, 32 Mill Street, P.O. Box 310, Thornbury, ON N0H 2P0

Tel: 519-599-3131 ext. 226 | Fax: 519-599-7723

Email: akershaw@thebluemountains.ca | Website: www.thebluemountains.ca

As part of providing accessible customer service, please let me know if you have any accommodation needs or require communication supports or alternate formats.

I would like a copy of my submission sent to my email address.

No

Any accompanying files are attached.



CLIMATE ACTION NOW NETWORK (TBM)

**COMMENTS ON THE DRAFT OFFICIAL PLAN
OCTOBER 3, 2024**

**Submitted by
Sally M. Leppard
On behalf of CANN's Official Plan Task Group**

CANN! We are a volunteer group in Town of the Blue Mountains. Our goal is to reduce the carbon footprint of the area and work together towards a more sustainable community.

Email: canntbm@gmail.com Facebook: [Climateactionnownetwork](https://www.facebook.com/Climateactionnownetwork) Instagram: [gogreen4blue](https://www.instagram.com/gogreen4blue)

1.0 INTRODUCTION TO CANN'S COMMENTS

On behalf of CANN's Official Plan Task Group, we would like to express our appreciation for the opportunity to provide comments on the Town's Review of our Official Plan. The process that has been undertaken has been comprehensive and inclusive, and we very much appreciate that.

CANN has been an active participant in the process – attending at Council, workshops, open houses, participating in the surveys and most recently, attending at the Open House and Public Meeting held on October 1, 2024 and making verbal remarks. This document is to be read in conjunction with our submission on October 1.

While we were offered the opportunity to meet with Planning Staff and Consultants, we decided to submit detailed comments in 2022-23 on both the Stage 1 approach, and the Environment and Climate Change Background Paper. We were encouraged to provide suggestions for line-by-line changes, and have done so twice – firstly in our report on Phase 1, where we commented on the proposed Phase 1 changes, and provided specific insight into the changes we suggested for Phase 2. We presented at Council, and were encouraged with the firm direction they provided to strengthen the language in the Official Plan, and as such, demonstrate that climate change is in fact an emergency and must be taken seriously.

The following submission is the second time we are proposing line-by-line changes, as requested by the Consulting Team at the Open House on September 23, 2024. It has been a significant effort – reviewing almost 400 pages of text and maps.

On reviewing the current version – we note that Climate Change has been incorporated in the Introductory sections – Vision, Principles and Strategic Objectives. In sections B, C and D, adaption and mitigation measures are mentioned in some sections, but, disappointingly, implementation is generally optional. Very few, if any, of our wording suggestions have been incorporated.

In sum, while the INTENTION of this version of the Official Plan speaks to the importance of climate mitigation and adaptation, the language remains weak, and as such, will be difficult to ensure implementation. One purpose of this Official Plan Review is to ensure that there is no ambiguity in the interpretation of the INTENT or POLICIES within this Official Plan. We do not believe that, in the case of climate change impacts and measures to mitigate and adapt, that there will be any firm mandate to incorporate these essential measures.

Email: canntbm@gmail.com Facebook: [Climateactionnownetwork](#) Instagram: [gogreen4blue](#)

We trust that our recommendations herein will be taken seriously, as they are presented in good faith.

We request that we meet with staff to further explain the rationale behind our proposals.

Respectfully submitted,

Sally Leppard, Co-Lead
Climate Action Now Network
canntbm@gmail.com



A. VISION, OBJECTIVES AND LAND USE CONCEPT

COMMIT TO APPLYING THE VISION AND GUIDING PRINCIPLES THROUGHOUT THE OFFICIAL

PLAN. We recognize that the Vision, Guiding Principles and Strategic Objectives have been described as they were relied upon in preparing this official plan review. However, it must be clearly stated that not only were they used to **prepare** this Official Plan, but that they are to be **applied throughout** this Official Plan. It is essential that the language here is clear and unambiguous.

In the description of our community, we need to refer to the risks caused by climate change, state our Net Zero CO2 target (noted in the Energy Conservation and Demand Management Plan 2019), provide a strong description of our agricultural community as it is the largest land use and a most important employer. And, there is no direction here to endorse, follow and implement the Grey County Climate Action Plan,

STRENGTHEN THE LANGUAGE. CANN recommends that the language is strengthened to reflect the significance of climate change to public safety and health within the Town of The Blue Mountains

We make the following recommendations for specific wording changes.

- **A1.1 GUIDING PRINCIPLES:**

- Policy #4: delete “economically and socially viable” and replace with “sustainable neighbourhoods”. (Sustainable neighbourhood incorporate economically, socially and **environmentally** viability)
- Policy #6: After “associated ecological functions so that they **“add: are connected throughout the community,** and can be enjoyed...”
- Change Principle 7 to read: “Direct climate change policies and actions that result in reduction in greenhouse gases, ensure energy efficiency, and embed Climate Change mitigation and/or adaptation policies and actions into all relevant planning and development policies, to increase our community’s resilience to the effects of climate change.

- **A3 GOALS AND STRATEGIC OBJECTIVES**

2.3 STRATEGIC OBJECTIVES

Firstly, we wish clarification on whether or not the Strategic Objectives are enforceable. Since they are not referenced in the Policy sections of the Official Plan, we assume not. However, the body of the Plan must reflect these Strategic Objectives or they are pointless.

Our Specific Comments:

- A3.1 SUSTAINABLE DEVELOPMENT: The Blue Mountains Sustainable Path is referenced, and we support this Vision.
 - Our Future Story needs to be referenced here and implemented throughout the implementation section.
 - A3.1.2.1 – Change to: “Ensure development is **“planned** and built...”

- A3.1.2.8 – add, after automobiles “**establish a modal shift target which ensures transit, cycling, walking ...**”
 - A3.1.2.15 Replace “Encourage” with “Ensure”
- A3.2 NATURAL ENVIRONMENT:
 - Goal: Delete “work towards the” and “replace with “**establish a connected natural heritage system**”
 - A3.2.2.1 Change to read: “Protect **and ensure** net gain enhancements to significant natural heritage and hydrologic features and their associated habitats and ecological functions **in all relevant planning and development decisions**”
 - A3.2.2.5 Change “discourage the loss of” and replace with “**prohibit the loss or fragmentation of significant woodlands**”
 - Add: Set targets for forest and urban tree cover – utilizing the Natural Heritage Study and Natural Assets Inventory. Reference Grey County and Conservation Authorities’ targets.
- A3.3 CLIMATE CHANGE ACTION: Strategic objectives include recognition of declaration of a Climate Change Emergency, and references to land use planning that supports resilience, active transportation, intensification and reducing heat island effect.
 - Strengthen the language in goal A3.3.1 – in the 6th line, change “needs” to “**will**”
- A3.2.2 STRATEGIC OBJECTIVES
 - CORRECT THIS NUMBER TO A3.3.2
 - **Add A3.3.7 Implement climate change mitigation policies and actions that will reduce greenhouse gas emissions from land uses such as housing, institutional, commercial, tourism, recreation and industrial development at all scales;**
 - **Add A3.3.8 Implement climate change adaptation policies and actions by designing our Town’s growth with resilient infrastructure, increasing the use of renewable resources and establishing green development standards that achieve net zero carbon by 2045.**
- A3.4 GROWTH AND SETTLEMENT: Strategic objectives include references to intensification, and efficient use of land and infrastructure.
 - A3.4.1 #4 – Delete “encourage” and add “**Lead net zero** greenfield development that efficiently uses land and infrastructure”
- A3.7 AGRICULTURE
 - Note the importance to agriculture of climate mitigation and adaptation measures;
 - A3.7.11 Change to read: “...to conserve a farm’s soil, water **quality and quantity, and prevent runoff to water courses** without sacrificing productivity”
 - Add: Support food security and a resilient agricultural economy by protecting agricultural land and diversification of farming operations.

- A3.9 TOURISM: Refer throughout to “*Sustainable* Tourism”. Define Sustainable Tourism in the definition section.
A3.9.6 – Add: ***Protect and enhance the Beaver River Trail system, including all naturalized access points. (Identify the Beaver River Trail on the Land Use maps and schedules. It is currently missing.)***
- A3.10 INFRASTRUCTURE:
A3.10.3 Change “encourage the establishment of...” to “Establish an integrated...”

A4 LAND USE CONCEPT

- **A4.1.15** Future Secondary Plan areas: Missing Thornbury East (noted in A2.2) and included in B3.13.2

B. LAND USE DESIGNATIONS

There is a need to ensure that the Goals, Principles and Strategic Objectives are applied to Section B. Please check that the commitments in Section A are reflected in their intent and entirety.

B2. Insert as a goal:

“All new building shall comply with the Town’s Green Building Standards”

B2.17 Establish Green Development Standards, working with Grey County and other municipal partners to establish standards for green buildings in both the Town buildings and community buildings that achieve net zero emissions by 2045.

B5 ENVIRONMENT AND OPEN SPACE

Recommended changes:

- Strengthen policies by adding data and findings from the Natural Heritage Study (NHS) and Natural Asset Inventory (NAI) so that natural features can be accurately identified and mapped. **Establish ambitious targets.** Incorporate reference to the importance of natural services to climate mitigation and adaptation. This work must be completed, approved by Council, and incorporated into the OP as an Official Plan Amendment as soon as possible. More details and a timeline for implementation are required.
- B5.2.1 (b) Development and Site Alternations – delete **“unless it can be demonstrated...”**
- There should be **no development** where Karst exists.

C. WATER, ENVIRONMENTAL AND HAZARD POLICIES

There is a need to ensure that the Goals, Principles and Strategic Objectives are applied to Section B. Please check that the commitments in Section A are reflected in their intent and entirety in Sections B-E.

C1. OBJECTIVES

d) Add “Support and implement the Grey County Climate Action Plan and continue to implement and update the Town’s Energy Conservation and Demand Management Plan (2019)

C7. WATER TAKING

- Prohibit water taking for commercial sale.

C8 WATERSHED PLANNING

- Include cross-reference to source water protection plans in C.4
- C8.1 – Reference Nottawasaga and Grey Sauble Conservation Authorities

C10. WASTE DISPOSAL

- Incorporate TBM's position that waste is considered a resource, and it is a policy of this Plan to achieve maximum reduction, re-use, recycling and composting to minimize the amount of waste going to landfill.

D. GENERAL DEVELOPMENT POLICIES

There is a need to ensure that the Goals, Principles and Strategic Objectives are applied to Section B. Please check that the commitments in Section A are reflected in their intent and entirety in Sections B-E.

D2 TRANSPORTATION

Policies in this section that are most directly relevant to climate change action focus on active transportation, public transit and transportation demand management:

- D2.5 ACTIVE TRANSPORTATION: Some strengthening of language required (e.g., replace “encourage” and “promote” with “require” or “mandate”)
- D2.7 PUBLIC TRANSIT: Language should be strengthened to drive implementation.
 - Remove “support the development of” and insert “develop a transit strategy for the Town”
 - Within this strategy, plan for shuttle services to beaches, trail heads and popular tourist areas.
 - In (e) Refer to the Trail plan, which includes crosswalks across Hwy. 26

D5.6 RURAL CHARACTER

- Add to b) “protection of forested areas”

D6.3.3 PARKS

- Incorporate protection of natural services and the requirement to set aside naturalized areas in parks.

D7. Include a date for the plan.

D8 SUSTAINABLE DEVELOPMENT

This section includes several cases where potential climate change mitigation/adaptation measures are referenced, but stronger language that mandates or supports implementation is required. Ensure that the Town supports and implements the Grey County Climate Action Plan, and the measures included in the Town's “Our Future Story”.

- D8.1 GREEN DEVELOPMENT STANDARDS: The current list of GDS topics should be expanded to include efficient use of municipal infrastructure, reducing GHG emissions from buildings and transportation, energy efficiency, complete communities, green space, and climate change resilience. Continue to take leadership in GDS, while coordinating with Grey County, the Province, and neighbouring municipalities. There is a requirement to develop GDS but no timeframe.
 - D8.1(c) remove “minimum standards” in (i) and (ii)
- D8.2 TREE CANOPY: Include a stronger policy statement on the protection of established trees in settlement areas as well as woodlands, watersheds and other natural features. Update/expand this Section to reference available tools/resources such as the Tree Inventory and the NHS/NAI. Ensure protection of mature trees on Town-owned land, including parks, open spaces and boulevards, and all Natural Heritage areas. Add policies to prevent clear-cutting of developable lands, to require tree canopy assessments as part of approvals processes, and to specify tree replacement requirements in cases where removal is required. Include policies to guide and enable a Tree Protection By-law applicable to TBM settlement areas and incorporate a target of 40% urban tree canopy protection.
- D8.4 ENERGY CONSERVATION AND EFFICIENCY MEASURES: Strengthen policies to reduce energy consumption in Town owned facilities/equipment. Strengthen language by replacing “promoting” with “requiring” or “implementing policies that require...”
 - Add to (g) heat pumps, net zero technology
 - Reference the requirement to implement and update the Town’s Energy Conservation and Demand Management
- D8.5 AIR QUALITY: Expand policies to encourage reduced vehicle idling times through measures that reduce congestion on Highway 26 and in settlement areas.
- Mandate ecologically sustainable natural buffers between the built environment and rivers, streams, wetlands, watersheds, and other natural assets; extending this to include prevention of sprawl and strict protection of all natural assets.
- Enable implementation of the policies listed above through tools such as Zoning, CPPS, GDS and Community Design Guidelines.
- D8.6 – (g) New Development
 - “Implement Green Development Standards”

E1 PLAN IMPLEMENTATION AND ADMINISTRATION

There is a need to ensure that the Goals, Principles and Strategic Objectives are applied to Section B. Please check that the commitments in Section A are reflected in their intent and entirety in Sections B-E.

Specific land use planning tools are referenced in this section. There are opportunities to add climate change mitigation/adaptation to the list of items that must be evaluated before

development proposals can be approved. Climate change mitigation/adaptation must be added to the following:

- E1.2 COMMUNITY PLANNING PERMIT BY-LAW:
 - a. Add a direct reference to climate change mitigation and adaptation in b) iii.
 - b. Need criteria for identifying the areas to be considered for the community planning permit by-law. Incorporate community engagement on the principles/goals/objectives etc. and land uses identified in the Community Planning Permit. Specify that the intent of this Official Plan must be recognized.
- E1.5 Add to (d) the Principles and Policies of this plan must be demonstrated and followed.
- E1.7 SITE PLAN CONTROL: Add a reference to climate change mitigation/adaptation measures, including tree canopy protection/enhancement, tree planting, minimum buffering to protect natural assets such as watersheds, wetlands, etc.
 - a. Add a new (c) Prioritize the use of nature-based solutions and ecosystem services such as carbon sinks and flood attenuation measures.
- E3.1 Secondary Plan Areas. Refer to the Official Plan Principles, and add climate mitigation plans and reference the importance of nature-based services.
- E3.5 COMMUNITY IMPROVEMENT: Add implementation of climate change adaptation/mitigation measures to goals and objectives. Encourage restoration and protection of natural heritage.
- Add a subsection on Green Development Standards.
- E4 (j) Council must decide. There should be no delegation of authority.
- E7 (a) Question the date – 2026. We have enough land identified until 2046.
 - a. In amendments – include clear direction that the Principles and Strategic Objectives must be followed.
- E.10 – Add “adhere to net zero principles, goals and objectives.

DEFINITIONS - GLOSSARY:

There is a need to add definitions for the following:

- Complete Communities
- Sustainable Communities
- Climate Emergency – reference this directive in full
- Climate Change
- Sustainable Tourism
- Sustainable Development
- Net Gain.



October 9, 2024

Town of the Blue Mountains Council
(c/o Corrina Giles, Town Clerk)

And

Shawn Postma
Senior Policy Planner
Town of the Blue Mountains
32 Mill Street
Thornbury ON, N0H 2P0

**RE: Comments on Updated Draft Town of the Blue Mountains Official Plan
Great Gulf – Castle Glen & Lora Bay**

On behalf of Great Gulf, please accept this letter as comments on the draft Town of the Blue Mountains Official Plan (September 2024) which has been released as part of the Official Plan 5 Year Review. Great Gulf are the owners of the following lands in the Town of the Blue Mountains:

- Castle Glen – owned by Great Dale Manor Limited; and
- Lora Bay – owned by NG Lora Bay Limited.

We note that the updates to the Town Official Plan generally seek to implement changes to planning legislation that have occurred over the last couple of years. Our comments on the draft Town of the Blue Mountains Official Plan update are as follows:

- 1. Castle Glen Secondary Plan** - It is noted that no changes are proposed to the Castle Glen Secondary Plan Area as part of the Town Official Plan update. Great Gulf has no concerns with this approach. It is important that the Official Plan update not impact existing development permissions implemented by the site specific policy framework for Castle Glen.
- 2. Lora Bay Land Use Schedule 'A-1'** - Lora Bay, provided with the Draft Official Plan, remains the same as the current approved Schedule 'A-1'. The applicable land use designations are "Recreational Commercial Area", "Residential Recreational Area", "Hazard" and "Rural". We request confirmation of our understanding that the Draft Official Plan of September 2024 does not propose any change to Schedule 'A-1'.

The lands designated "Rural" and part of the NG Lora Bay Limited holdings comprise about 15 hectares and are surrounded by the "Residential Recreational Area" designation while having frontage along Hwy 26. The "Rural" 15ha appear to be an historical anomaly representing land holding limitations with the original Lora Bay developer.

The Owner has held several project coordination meetings with the Town over the past two years. The 15ha Rural designated lands has been discussed and acknowledged as being a logical extension of the master planned Lora Bay community. Road and service extensions along with residential development plans are easily integrated.

It is respectfully submitted that as the Owner is refining plans at present to include the Rural lands into its community development plan, this Official Plan review process is an appropriate time to update the Rural designation with the Residential Recreation Area designation. Therefore, with this submission, the Owner is requesting that the Rural designated lands be designated Residential Recreation Area.

3. Residential Recreational Area – The "Residential Recreational Area" designation currently permits a range of uses including single detached, semi-detached, townhouse, multiple dwelling types. The Draft Official Plan proposes to add the following uses to Section B3.7.3, Permitted Uses (page 82):

- Duplex dwelling
- Apartment dwelling subject to Section B2.16
- Additional residential units subject to Section B2.7
- Infill development and intensification subject to Sections B3.14, B2.15 and B2.16
- Greenfield development subject to Section B2.17

The additional permitted uses do not generally pose a concern. However, we find that the policies applying to apartment type dwellings are also subject to Section B2.13 in addition to B2.16 and to follow form, this should be noted in the Official Plan. B2.13 limits the height of buildings to three stories which is a restrictive limit on apartment dwelling type structures. Under Section B2.13, should a proponent seek more than three storeys, an Official Plan Amendment will be required. As it stands, the proposed height limit results in low rise apartment dwelling type structures which may prove challenging to design and bring to market

4. Recreational Commercial Area - Section B3.8 provides Recreational Commercial Area policies that remain unchanged over the existing Official Plan (page 93). The range of permitted uses retains golf courses and private recreational clubs as permitted uses. Please confirm our understanding that the Draft Official Plan is not proposing modifications to Section B3.8.

5. Density - The Draft Official Plan introduces new restrictive policies on density ranges and maximum height by unit type for the Residential Recreational Area designation (Section B3.7.4.2, page 84). Although the density ranges generally match industry standards per dwelling type, it must be noted that to achieve an apartment type density of 100 units per gross hectare within a three-storey height restriction is going to prove to be difficult to implement.

Additionally, it is requested that Lora Bay be exempt from requiring a minimum of 10 units per hectare due to the master planned nature of the development. Should the proposed densities remain, it is requested that confirmation be provided that the updated open space and density requirements and related policies remain applicable to the Lora Bay master planned community as a whole and are not applicable to separate sub-phases.

6. Affordable and Attainable Housing – A number of new policies are proposed related to the provision of attainable and affordable housing. Of note, policy D7.4 a) identifies that development proposals with more than ten (10) residential dwelling unit proposed demonstrate the provision of affordable housing units. The proposed definition of affordable housing units in the case of home ownership in the Town Official Plan is the following:

- a. Housing where the purchase price is at least 10 percent below the average purchase price of a resale unit; or
- b. Annual housing expenses do not exceed 30% of gross household income (i.e. before tax income).

For rental housing, affordable is proposed to mean a unit where rent is the least expensive of the following:

- a. At or below the average market rent in The Blue Mountains; or
- b. Rent prices do not exceed 30% of gross household income.

Proposed Policy D7.4 b) identifies that the Town will plan to achieve and provide for affordable housing and attainable housing by planning to achieve a minimum target of 30% of new housing, or units created by conversion, to be affordable.

Overall, these policies have the potential to result in required affordable units being subsidized by the remainder of units in a development project and provide no guarantee that units will remain affordable through resale. There are other policies and mechanisms to rely on for the provision of affordable housing units including using viable incentives and it is requested that these policies be removed for this reason.

Additionally, it is understood that Policy D7.4 b) is intended to be implemented town-wide and not on a development basis, however confirmation on this interpretation is requested. Additionally, should Policy D7.4b) remain, it is requested that the policy be revised to include "attainable housing" in addition to "affordable housing" to provide flexibility and additional range in the housing types to be provided.

Castle Glen and Lora Bay are master planned areas that have planned functions to provide for resort residential and residential recreational developments. These land uses are unique from other residential areas in the Town and it is recommended that the Official Plan be clear in not requiring affordable or attainable housing to be a component to resort residential or residential recreational developments.

7. Natural Heritage – Under Section A 3.2.2 of the draft Town Official Plan, the following are noted as strategic objectives:

- *Protect and seek out opportunities for net-gain enhancements to significant natural heritage and hydrologic features and their associated habitats and ecological functions.*
- *Prohibit the loss or fragmentation of Provincially Significant Wetlands and significant habitat of endangered and threatened species.*

The proposed revision to the first strategic objective takes the natural heritage policies beyond the no negative impact test outlined in the Provincial Policy Statement. It will not be viable with current prohibitions to development in various significant features and functions (e.g., significant woodlands, significant wildlife habitat). We should clarify what protect and seek out opportunities means.

Similarly, the second provision does not recognize situations in which permits and agreements allow for the removal of habitat of endangered and threatened species. The term “significant habitat” is not well defined or available/acceptable in practice.

8. Staging Categories – Section D1.4 is proposed to be updated to in a manner which requires a proponent is required to confirm ‘system capacity’, in addition to ‘plant capacity’. It is requested that clarification be provided around how this policy will be interpreted and what mechanisms will be available for proponents to determine system capacity and ensure conformity with this policy.

9. Roads - Section D2.2 provides very specific paved shoulder / multi use trail requirements for different roads in the Town. These requirements are too prescriptive and not suitable for an Official Plan. It is recommended that principles be included but that any specific requirements be removed from the Official Plan.

10. Access Policies – D2.2.2 states that, "*Single access to new residential developments will be considered up to 85 units. New residential developments greater than 85 units will need to have two or more full accesses. Access to new residential developments will be considered through the phasing of the development however the above thresholds will be used to consider the design and phasing of the access. This policy shall not be interpreted to limit intensification on increased density; however, where the above standards for multiple accesses cannot be met, it shall be demonstrated that suitable and safe access can be provided to the satisfaction of the road authorities and emergency services.*"

We recommend that this policy be changed from referencing a number threshold to referencing that “suitable access can be provided.” The number is a technical standard that we do not support in the Official Plan.

11. Transition Policies - From our review of the draft Town Official Plan, there do not appear to be any transition policies. It is recommended that transition policies be added to the updated Official Plan to recognize existing development approvals and to allow for implementing applications to proceed in a manner which is deemed to conform to the Official Plan.

12. Implementation Policies – It is recognized that a number of policies have been added to Part E of the Town Official Plan related to implementation and administration of the Plan. Overall, the proposed enabling policies which will allow for the Town to implement new administrative processes and provide the increased ability for Staff delegation for some application types are positive and should assist with processing timelines.

With respect to Policy E1.8, additional clarification is requested on how the “minimum requirements” outlined in this policy are intended to function in relation to those requirements already prescribed under the Planning Act. From the wording of this policy, it is unclear if these requirements are in addition to public consultation requirements outlined under the Planning Act and to which development application types the requirements are intended to apply.

We would like to thank the Town for consideration of these comments, and should there be any questions, we would be more than happy to discuss with the Town.

Yours truly,

MHBC



Jamie Robinson, BES, MCIP, RPP
Partner



Ellen Ferris, MSc., MCIP, RPP
Associate

Shawn Postma

From: David Finbow [REDACTED] >
Sent: October 9, 2024 1:06 PM
To: Shawn Postma
Cc: Denis Martinek
Subject: Tyrolean Village Resorts 2021 Limited Official Plan Review Submission
Attachments: OPA 4.pdf

Hi Shawn,

Thank you for meeting with Denis Martinek and myself on October 2, 2024, regarding the Town's Official Plan Review. The purpose of this email is to formalize our verbal submission made at our meeting.

Tyrolean Village Beach - Schedule A-4

TVR has requested that the Hazard mapping on the lands be consistent with the 177.9 elevation (redesignated lands to be placed in the Residential Recreation Area). This is supported by the Shoreline Hazard Assessment completed by Tatham Engineering and the updated topographic information by JoeTOPO. Copies of Tatham Engineering and JoeTOPO material were provided by email on October 1, 2024, in PDF and DWG formats.

TVR also requested that Constraint Mapping Appendix 1 be reviewed re 100 Year Flood Mapping and that the Appendix 1 be revised by deleting the former irrigation ponds on the subject lands.

Tyrolean Village Beach - Policy B3.7.6.8

Policy B3.7.6.8 requires the dedication of publicly available shoreline in conjunction with the development of the lands.

TVR has requested that the shoreline component be clearly identified on Schedule A-4 and suggested the current beach area located at the northerly end of the subject lands.

Policy B3.7.4.1

TVR requested that clarification be provided in terms of the last Table that it appears in the Policy (how it relates to the Table above which permits 10 - 15 units per gross ha).

Tyrolean Lowlands - Policy B3.7.6.6

Policy B3.7.6.6 c) indicates that "A Commercial Resort Unit Complex with a maximum of 100 units may be permitted in conjunction with the Golf Course Development in the Residential/Recreational Area designation." TVR has requested that this be clarified to indicate that these 100 CRU's are in addition to what is permitted by B.3.7.4.1.

TVR undertook to provide the OMB Order and MOS - see attached. Regarding this material, please see consecutive page 8, page 1 of OPA No. 138 to the Beaver Valley Secondary Planning Area (OPA #4) wherein it is clear that "In addition, a maximum of 100 resort commercial units may be permitted..." This is of course, would be in addition to the density permitted at B.3.7.4.

Policy B3.9.4

TVR requested that the words "or units" be added after the word "rooms" to be consistent with the intent of the Plan and Section B2.2.

Policy B2.5 and Section B3.7.6 - Short Term Accommodation

Policy B2.5 references the exception area at B3.7.6 however there is no B3.7.6 exception area mapping.

Mapping needed at B3.7.6. **David Finbow**

Land Development & Building Code Consulting
[REDACTED]

October 10, 2024

To: Councillor Paula Hope, Chair, Planning and Development Services
Adam Smith, Director of Planning and Development Services
Shawn Postma, Senior Policy Planner
David Riley, Consultant, SGL Consulting

CC: Town Clerk, Town of The Blue Mountains
townclerk@thebluemountains.ca

From: Blue Mountain Ratepayers' Association
Planning Committee

Re: Official Plan Review, Phase 2

Introduction

BMRA has been fully engaged in the OPR process. We have reviewed all Phase 1 Background Reports, the proposed Phase 1 OP updates, all Phase 2 Background and Recommendation Papers and, most recently, the Phase 2 proposed updates. We have submitted comments at every opportunity. In particular, we note that we submitted 8 pages of comments on the Phase 2 Background Papers on February 29, 2024.

It is our view that public engagement for Phase 2 has been extremely compressed. The proposed Phase 2 updates were released just three weeks prior to the Public Meeting. A summary of earlier public comments and submissions, normally provided for public review, is not yet available. We appreciate having this opportunity to provide further comment following the Public Meeting, and would welcome a meeting to discuss our recommendations in greater detail, and answer any questions.

Growth Management

Ensuring that TBM's growth is sustainable is our most important planning challenge. The need to provide full and sustainable services to all residents, to manage infrastructure constraints and costs, to protect our natural heritage, and to recognize the disproportionate role TBM plays in accommodating regional growth, are fundamental considerations that establish a context for all OP policy updates.

The *Growth Allocations & Fiscal Impact Report* concludes that there is more than enough land available within TBM settlement areas to accommodate all the development anticipated for the next 25 years. The number of units in our development approval pipeline (4,500) exceeds the total number of new units required over the next 25 years (3,590), according to *the Grey County Growth Management Strategy*. Further, TBM is making progress toward intensification and increased diversity of housing stock. *The Growth Allocations & Fiscal Impact Report* notes that "The shift to row and apartment units is already evident in the Town's development pipeline." *The Density and*

Height Background Paper concludes that there are ample opportunities to continue and accelerate this trend, within the current height and density policy framework.

Our comments are submitted in the context that TBM is a small municipality confronting unprecedented growth pressures. Public concerns about growth in neighbourhoods and communities across our Town are also unprecedented. Residents are raising serious and legitimate questions about growth and pushing back, justifiably, on what appears to be a pattern of development that would be more appropriate in the GTA than TBM. We are currently accepting or considering far more growth, at a far faster rate, than is reasonable or sustainable for a municipality of our size.

We are at a critical time. We either accept excessive and poorly controlled growth and watch as we lose the unique qualities that make TBM so attractive to both residents and visitors, or we manage growth carefully to protect and enhance the livability, functionality, and sustainability of our Town.

In light of the above comments, the BMRA has taken a position on a number of important planning issues such as height and density, community design, housing affordability and the environment. The BMRA does not support 5 storey buildings anywhere except where already permitted in the Blue Mountain Village Resort Area. Four storey buildings along Highway 26 in certain areas of Thornbury and Craigeleith are proposed in this submission. The BMRA does not support a minimum density of 25 units per net hectare in greenfield developments in the community living area. This should be set at 20 units per net hectare as per the County of Grey Official Plan. The BMRA does not support a maximum density of 15 units per gross hectare in residential/recreational areas. The minimum density should be 10 units per gross hectare and the maximum density should be 12 in these areas. And the Community Design Guidelines should be updated and approved by Council prior to approval of the updated O.P.

Once approved and implemented, the Water/Wastewater Allocation Policy will have a significant impact on planning and complete community building in the Town. The Policy should be referenced in relevant O.P. sections such as Infrastructure, Housing, etc. This Policy, along with other recommendations, are intended to strengthen the Town's ability to control growth so that our already-strained infrastructure and services are used as efficiently as possible.

It is through tools such as the Water and Wastewater Allocation Policy, as well as the Community Improvement Program and the proposed CPPS, that community benefits in key areas such as housing and environmental protection can be secured.

Growth in our unique geography is having an outsized impact on our natural heritage features, such as woodlands, wetlands, and watersheds. BMRA would like to see the Town improve the direction, responsibility, and commitment to watershed planning and other functions that limit sprawl and support rigorous implementation of our environmental protection and climate change mitigation/adaptation policies.

Overall, our recommendations are aimed at strengthening the Town’s ability to ensure that development is economically, socially, and environmentally sustainable – a priority that has been expressed strongly and repeatedly by residents through numerous public engagement initiatives, ranging from the Community Sustainability Plan – The TBM Future Story, to the current Official Plan Review.

Specific Comments on the Proposed OP Update

The Vision, Guiding Principles, Goals and Strategic Objectives in our OP provide a solid general policy framework for TBM growth and development. At this general level, we support these policies, including the proposed updates and changes/additions recommended by BMRA and identified below. The primary challenge will be implementation and enforcement, so the Vision, Goals and Strategic Objectives can be realized. The majority of our recommended changes, additions and questions (identified with bullets) address subsequent Sections of the O.P. and focus on this challenge.

A1 THE COMMUNITY VISION AND GUIDING PRINCIPLES

- Add a reference to the Community Sustainability Plan: The TBM Future Story.

A1.1 GUIDING PRINCIPLES

- Add a reference our Town’s Declaration of a Climate Emergency to Guiding Principle No. 7.
- Strengthen Guiding Principle No. 4 by adding that compact communities require a full range of public and commercial services including, schools, local businesses, etc.

A2.2 SETTLEMENT AREAS and A2.3 OTHER COMPONENTS OF THE COMMUNITY STRUCTURE

- Is the repetition of the list of Future Secondary Plan Areas on page 24 intentional?

A3 GOALS AND STRATEGIC OBJECTIVES

A3.1 SUSTAINABLE DEVELOPMENT

- Add a reference to the Community Sustainability Plan: The TBM Future Story.

A3.3 CLIMATE CHANGE ACTION

- Strengthen the Goal and Strategic Objectives as per CANN TBM recommendations.

A3.4 GROWTH AND SETTLEMENT

- Strengthen this Section to support and implement the Water and Wastewater Allocation Policy.

A3.5 URBAN COMMUNITY CHARACTER

- In Section A3.5.2.6 replace “consider” with “must include”.

A3.6 RURAL AND OPEN SPACE CHARACTER

- Add a Strategic Objective that references conformity with the Natural Heritage Study and Natural Asset Inventory.

A3.8 ECONOMIC DEVELOPMENT

- Include a Strategic Objective that recognizes the specific economic development needs of Craighleith Village, with a focus on building a complete, fully serviced community.

A3.10 INFRASTRUCTURE

- Add a reference to the Water and Wastewater Allocation Policy.

A3.11 AFFORDABLE AND ATTAINABLE HOUSING

- Add a reference to the Housing Needs Assessment and the Community Improvement Program.

A4.1 URBAN DESIGNATIONS

- The definition of Future Secondary Plan Area in Section A4.1.15 differs from the definition used in A2.3.

B2 GENERAL POLICIES

B2.5 SHORT-TERM ACCOMMODATION USES

- Official Plan Amendment No. 3, adopted by the passage of By-law 2023-58 on August 28, 2023, is not fully integrated into the updated OP. Section B2.5 c) should be changed to refer specifically to Section B3.7.6.14 (i.e., replacing B3.7.6). Section B3.7.6.14 (Schedule A-1, which defines the Exception Area for OPA No. 3) has not yet been added to the updated OP and must be included.
- Sections B2.5 c) and B2.5 d) i) clearly prohibit all short-term accommodation uses in residential neighbourhoods outside of the Exception Area defined in Section B3.7.6.14. Further clarification and the elimination of potential confusion is therefore required in Section B2.5 a) by deleting the following statement: “In some cases, such commercial accommodations may be considered appropriate in some residential areas, provided they are adequately regulated to avoid land use conflicts with the surrounding area”.

B2.9 CONVERTED DWELLINGS

- We support up to four units permitted within an existing building footprint in the Community Living Area designation, provided the intensification criteria are satisfied.
- Further clarification is required to distinguish “Converted Dwelling” from “Additional Dwelling Unit” (as defined in the Glossary) and specify what constitutes a “larger single or semi-detached dwelling.”

B.2.13 BUILDING HEIGHT

- Change wording in the third paragraph in Section B2.13 to “Compatible *intensification* up to four (4) storeys (or 16 metres) is encouraged along Highway 26 in the Craigleith Village Community, and along Highway 26 in Thornbury outside of the low-rise downtown Thornbury core. For the purpose of this Plan, the downtown Thornbury core consists of properties within the Downtown Area designation along Bruce Street, and along Highway 26 between Victoria Street and Wellington Street.”
- Change wording in the fourth paragraph in Section B2.13 to clarify that 4 storey buildings may be permitted through a site-specific ZBA only within the designated areas: “In the designated areas of Craigleith and Thornbury noted in the above paragraph, 4 storey buildings may be permitted through a site-specific Zoning By-law Amendment, provided the height criteria and general intensification criteria set out in Section B2.14 are met: “
- Add a direct reference to the required setback of 12-16 metres from the Hwy 26 road allowance (see Section B3.3.4.1).
- Add a reference to a requirement for affordable or attainable housing

B2.14 EXISTING RESIDENTIAL NEIGHBOURHOODS

- Note typo: “now” housing.

B2.16 INTENSIFICATION CRITERIA

- The word “considers” in items i) and j) should be replaced by “adheres to” or “conforms with” or another term/phrase to require implementation.
- Add a requirement to conform with the updated Community Design Guidelines.
- Add a requirement to link intensification to community benefits such as affordable/attainable housing, GDS, etc. Repeat this requirement in the last paragraph of this Section so it applies specifically to pre-zoning.
- Clarification is required to ensure that the definition of “intensification” in the Glossary does not enable overriding of any of the density or height limits in the OP.

B2.17 GREENFIELD CRITERIA

- The word “considers” in item i) should be replaced by “adheres to” or “conforms with” or another term/phrase to require implementation.
- Add a requirement to conform with the updated Community Design Guidelines.
- Add a requirement in B2.17 i) to link Greenfield development to the provision of community benefits.

B3 URBAN LAND USE DESIGNATIONS

B3.1 COMMUNITY LIVING AREA

B3.1.4 Density and Height

- All Maximum Height limits in the accompanying chart should be expressed in metres as well as number of storeys.

- “Half storey” should be defined.
- BMRA’s position is that a maximum of 100 units per hectare for multiple & apartment units would represent an extreme and unprecedented change for most of the Community Living Area and difficult or impossible to achieve without compromising open/green spaces, vegetation, compatible yards/setbacks and other compatibility requirements as defined in Sections B2.16 and B2.17.
- Consider re-inserting the following statement to accommodate circumstances where achieving the stated minimum density may not be possible: “It is recognized that in some areas maximum density may not be appropriate.”
- Maintain the minimum density of 20 units per net hectare in new Greenfield areas in accordance with the direction of the County of Grey Official Plan.

B3.3 DOWNTOWN AREA

- Change language in B3.3.1 to: “establish Downtown Thornbury along Highway 26 (Arthur Street West/King Street East) as the Town’s primary focus area for intensification ~~and taller buildings~~, while preserving the low-rise character of the Downtown Core, which includes properties along Bruce Street within the Downtown Area designation, and properties along Highway 26 between Victoria Street and Wellington Street;”
- Change language in B3.3.4 d) to: “limiting the height of new and renovated buildings to a maximum of three storeys within Thornbury’s downtown core, which includes properties along Bruce Street, all of Downtown Clarksburg, and along Highway 26 between Victoria Street and Wellington Street, in order to maintain consistent facades and preserve the character of each main street;”
- Change language in B3.3.4 e) to: “encouraging mixed use intensification and the progression of taller buildings up to ~~five (5)~~ four (4) storeys along Highway 26 (Arthur Street West/King Street East) in Thornbury, outside of the downtown core and in accordance with Section B2.13;”
- This statement in Section B3.3.41 concerning setbacks from Highway 26 is important and should be repeated in B2.13 BUILDING HEIGHT, : “j) to maintain and enhance the open space landscape character of properties along Highway 26, and to ensure the continued and improved feeling of spaciousness along the well-travelled Highway 26 corridor, buildings shall be setback a minimum of 12 metres and a maximum of 16 metres from the front property line. “
- Schedule A-2 should be amended to ensure that the mapping and terminology used is consistent with definitions of Downtown Core, Downtown Area, etc. in the OP text.
- This language in Section B3.3.5.3 requires a change to be consistent with earlier sections: “Outside of the downtown core, compatible intensification up to ~~five (5)~~ four (4) storeys is encouraged in the Downtown Area designation in Thornbury, ~~generally~~ along Highway 26 (Arthur Street West/King Street East) on appropriately sized and situated lots. ~~The development of buildings up to five (5) storeys may be permitted, and~~ subject to the height criteria set out in Section B2.13 and the general intensification criteria set out in Section B2.16.”

B3.4 COMMERCIAL CORRIDOR

- Add a requirement to conform with Section B2.16 INTENSIFICATION CRITERIA and the Community Design Guidelines. Ensure that the specific setback requirements for 4 storey buildings (12-16 metres from Highway 26, 45-degree plane from adjacent lot lines) apply within this land use designation.

B3.7 RESIDENTIAL/RECREATION AREA

B3.7.4.1 Density and Open Space Requirements

- BMRA supports the addition of a Minimum Density requirement of 10 units per gross hectare.
- BMRA does not support the Maximum Density of 15 units per gross hectare. This represents a major increase of 50%, and raises concerns about whether the Minimum Open Space Component of 40% can be maintained and enforced. We recommend a Maximum Density of 12 units per gross hectare in the Residential/Recreation Area.
- Note typo in B3.7.4.2 Further Lot Creation: Delete “the”.

B3.12 CRAIGLEITH VILLAGE COMMUNITY

- B3.12.1 Location; Note that “Craigleith Village Community” is not shown on Schedule A-4. Components such as Craigleith Village Commercial and Craigleith Village Residential are represented.
- There is confusing language in B3.12.3.1.1 f) regarding building heights. Clarification is required.
- Clarification is required to determine the maximum number of residential units permitted in the Craigleith Village Community. Section B3.12.3.2.1 a) specifies the maximum number of units per Sub-area. Does this override the maximum units determined by allowable densities permitted by housing unit type, as referenced in B3.12.3.2.1 a)

B5 ENVIRONMENTAL AND OPEN SPACE

B5.2 NATURAL HERITAGE FEATURES

- Intensification and efficient land use within Settlement Areas requires protecting our valuable and unique natural heritage features, including wetlands, watersheds, woodlands, tree canopy, and other natural assets. It is acknowledged in this Section that “the location and significance of these features has yet to be determined in some cases”. Policies must be updated by integrating findings from the Natural Heritage Study (NHS) and Natural Asset Inventory (NAI) as soon as possible.
- Mandate ecologically sustainable natural buffers between the built environment and rivers, streams, wetlands, watersheds, and other natural assets; extending this to include prevention of sprawl and strict protection of all natural assets. Policies in B5.2.1 that specify minimum distances between development and Natural Heritage Features should be strengthened and updated to ensure consistency with NHS/NAI findings.
- Policies that direct potential site alteration or development within Natural Heritage Features must be updated to ensure that no development is permitted on these lands under any circumstances. Examples include:

- B5.2.1 b): Delete the statement that would allow development if “it has been demonstrated that there will be no *negative impacts* on the natural features or their *ecological functions*.”
- B5.4.2 c) v): Delete the statement that would allow development if “there is no feasible location for the *development* outside of the *Hazard Lands* designation.”

B5.4 HAZARD LANDS

- Add Stormwater Management Ponds to the definition of Hazard Lands.

PART C: WATER, ENVIRONMENTAL AND HAZARD POLICIES

C4 GROUND AND SURFACE WATER RESOURCES (SOURCEWATER PROTECTION)

- Incorporate findings from the NHS and NAI where relevant and as soon as possible.
- Strengthen policies to mandate stronger adherence to the 30-meter setback from watercourses and protect abutting local, non-invasive vegetation and trees on along watercourses, and within or near watersheds and wetlands.
- What is the rationale for deleting the requirement to map sensitive groundwater areas (Section C4.2)?
- Expand Section C4 to include water quality related to public beaches. Protection must be given to ensuring water quality is not compromised for the safety of residents and visitors

C4.3 GENERAL POLICIES, C4.4 SIGNIFICANT THREATS, C5 STORMWATER MANAGEMENT

- Ensure that the specific requirements in these Sections are consistent with the most up-to-date standards for flood control and resilience to extreme weather events. Connect with CANN

C8 WATERSHED PLANNING

- Watershed planning must become top priority in TBM. Watershed and Sub-watershed Plans must be completed as soon as possible, along with OP policies that reference and mandate adherence to these Plans.

D1 WATER AND SANITARY SEWER SERVICING STRATEGY

D1.4 STAGING CATEGORIES

- It is unclear where/how the Water and Wastewater Allocation Policy, including the evaluation of community benefits associated with development proposals, fits into the staging policies in Section D1.4. References to the Water and Wastewater Allocation Policy should be included in this Section and in the Sections B3 URBAN LAND USE DESIGNATIONS and B2 RURAL COUNTRYSIDE DESIGNATIONS where relevant.

D2 TRANSPORTATION

- Additional policies to address traffic congestion on Highway 26 are required. An Objective to revisit the 2015 study by MTO on a potential bypass around Thornbury and Clarksburg has been added, but it is well-known that this is a long-term goal with multiple complexities and uncertainties. In the meantime, increased building heights and densities along Highway 26 are proposed, with no clear policies to address the inevitable increases in traffic along a route that is already at capacity during peak times, according to the Town’s Transportation Master Plan.

D2.2 ROADS IN THE TOWN

- BMRA supports the integration of active transportation design guidelines within the General Design Guidelines in Table 1. Updated Community Design Guidelines must include the infrastructure improvements required to support Active Transportation to support community and neighbourhood compatibility, in addition to transportation safety and efficiency. Policies to reference and ensure adherence to the Community Design Guidelines must be added to this Section.

D2.5 ACTIVE TRANSPORTATION

- Some strengthening of language is required (e.g., replace “encourage” with “require” in items o) and p) regarding bicycle racks.

D5 COMMUNITY DESIGN

D5.1 OBJECTIVES

- The importance of ensuring that developments adhere to high quality design principles is clearly stated in Section D5.1, and supports BMRA recommendations regarding ensuring high-quality design and compatibility with established neighbourhoods and communities.

D5.2 DESIGN POLICIES

- The link to Town-wide Community Design Guidelines is established in D5.2. The OP should not be approved without the updated Community Design Guidelines in place. This Section should ensure all developments must conform to the Community Design Guidelines, as well as other relevant Town plans and policies where relevant.

D5.4 HIGHWAY 26 CORRIDOR

- A definition of “buffer strips” is required.

D6 PARKLAND DEVELOPMENT POLICIES

- Parklands and Trail Networks play an important role in the protection and enhancement of tree canopy and other natural heritage features. Policies are required in Sections D6.3.1 and D6.3.5 to ensure that opportunities to protect and enhance these features are identified and implemented.
- Include a policy to prevent clear cutting of trees on TBM Parks and Open Spaces.

D7 HOUSING

- BMRA supports the policies set out in Section D7, while recognizing that these policies will only be successful with the application of tools such as the Water and Wastewater Allocation By-law, the CPPS, and the CIP, which incorporate mechanisms to require or provide incentives to ensure that housing objectives and targets are achieved.
- BMRA does not support the use of “voluntary contributions” in lieu of affordable builds without an approved and fair regulatory framework. This framework should be enabled in the OP.
- Add a reference to the Housing Needs Assessment, which should include targets for affordable, attainable and/or rental housing units. Policy should state that the Housing Needs Assessment and targets require continuous updating.

D8 SUSTAINABLE DEVELOPMENT

- Update this Section to address environment and climate change priorities, including alignment with the Recommendations and Bold Actions from the TBM Future Story.

D8.1 GREEN DEVELOPMENT STANDARDS

- Expand the current list of GDS topics to include efficient use of municipal infrastructure, reducing GHG emissions from buildings and transportation, energy efficiency (link to D8.4), complete communities, green space, and climate change resilience. Continue to take leadership in GDS, while coordinating with Grey County, the Province, and neighbouring municipalities.
- Delete “minimum” in Section D8.1(c) i) and ii).

D8.2 TREE CANOPY

- Strengthen and expand this Section by referencing available tools and resources, such as the Tree Inventory and NHS/NAI. Develop stronger community tree protection policies. Ensure protection of mature trees in parks, open spaces and boulevards, and all Natural Heritage areas.
- Add policies to prevent clear-cutting of developable lands, to require tree canopy assessments as part of approvals processes, and to specify tree replacement requirements in cases where removal is required.
- Include policies to guide and enable a Tree Protection By-law applicable to TBM settlement areas.
- Provide a stronger policy statement on the protection of established trees in both settlement areas as well as woodlands, watersheds and other natural features.
- Require implementation of tree canopy protection/enhancement policies through tools including a Tree Inventory and a Tree Protection By-law applicable to TBM Settlement Areas.
- Ensure that tree canopy protection and enhancement is fully integrated within Community Design Guidelines.

D8.4 ENERGY CONSERVATION AND EFFICIENCY MEASURES

- Strengthen language in Section D8.4 by replacing terms such as “promote” and “encourage” with “require”, “ensure”, or “mandate”.
- Note missing words in e) iii) (e.g., maximizing *use of* existing buildings).

D8.5 AIR QUALITY

- Expand policies to encourage reduced vehicle idling times through measures that reduce congestion on Highway 26 and in settlement areas.

D8.6 WATER CONSERVATION

- Add a “support the implementation of Green Development Standards as they relate to water conservation.

E1 PLAN IMPLEMENTATION AND ADMINISTRATION

E1.2 COMMUNITY PLANNING PERMIT BY-LAW

- Apply a CPP By-law on a pilot basis in a carefully selected area as an initial stage of CPPS implementation. This approach is required to test the effectiveness of this planning tool, determine how it can be applied effectively in TBM, and promote widespread public awareness and understanding of how the CPPS differs from established planning processes.
- Ensure extensive public engagement prior to the implementation of a pilot CPP By-law.
- Add direct references to the protection/enhancement of natural heritage features and climate change mitigation/adaptation in Section E1.2.

E1.7 SITE PLAN CONTROL

- Add direct references to protection/enhancement of natural heritage features and climate change mitigation/adaptation.

E3.1 SECONDARY PLANS

- Add a policy to ensure that development is not permitted on lands in any Future Secondary Plan Area prior to Plan completion and approval. The policy should not preclude single family dwelling construction on vacant property.

E3.5 COMMUNITY IMPROVEMENT

- Add direct references to protection/enhancement of natural heritage features and climate change mitigation/adaptation to Section E3.3.3 l).

E10 COMPLETE APPLICATION REQUIREMENTS

- Add Green Development Standards to Section E10 e).

October 14, 2024

To: Planning Staff and SGL Consultants,
Town of the Blue Mountains

CC: The Mayor and Members of Council
Town of the Blue Mountains

From: Pamela Spence
Craigleith Resident

Re: **Official Plan Review Comments - Post Public Meeting, October 1, 2024**

I have been engaged in the entire OPR process. Over the past almost 3 years I have reviewed all Phase 1 Background Reports, Phase 1 Official Plan (OP) updates, Recommendations Papers, attended multiple workshops and meetings and, most recently, the Phase 2 Open House and subsequent Public Meeting.

Public engagement for the redlined draft is extremely compressed. The SGL presentation on October 1 was clear and hopeful but policies in the redlined do not reflect that the Town has properly implemented what the presentation conveyed.

Comments and changes being suggested by many of us have insufficient time to be meaningfully considered by staff, adjustments made and a revised draft presented and considered by the public if the intention is to have it all completed and approved before the end of the year.

Rightfully, the Town has spent almost 3 years to date gathering the important community input; what is the rush to have the final result in such a compressed time frame?

Please consider a revised draft OP being circulated showing changes based on this public input.

Growth Management:

We have repeatedly heard from Staff that, based on info to date, there are over 4000 units in the development pipeline. Therefore, the **current** densities in the 2016 OP provide sufficient growth for the Town to meet the forecasted increases in population. It is **not necessary** to increase densities in any areas as this revised OP proposes.

This OP's version of growth forecasts households at 1.8 residents per household which is different than the Operations Dept. 2.1 persons per household. Equally importantly is what is the household structure – are there more singles, fewer families, aged population or lonely people – the family structure is important to know. It impacts services, schools, transit etc.

Most importantly, the growth projection to 2046 is wrong (page 16 – 1st paragraph). It says 80% of the expected growth (incorrect number given) is going to go to Thornbury Clarksburg when we know from actual population counts just above, the growth has been in Lora Bay and Craigleith! This changes a fundamental principle and priority of addressing planning – but has it in this draft???

We know there are over 1200 residential units with various stages of permits under development in Craigleith. If Craigleith Village is hoped to service the Craigleith area – is Craigleith a smaller settlement area than Thornbury as stated on page 23? Does it need more attention? Commercial development is “encouraged” (per OP) but not emphasized or required in Aquavil at this time.

The draft OP also forecasts 1610 new jobs by 2046 – how was this forecast made and what type of jobs are anticipated? Where are these commercial activities going? Where is the school to support these families? These details are necessary to properly plan.

(NOTE: page numbers below refer to pages of red-lined draft OP released Sept. 10, 2024)

Vision, Guiding Principles, Goals and Strategic Objectives

The first goal in the Official Plan (OP) is Sustainable Development. However, pg 18 still references the 2010 document The Sustainable Path. As a former member of the Sustainability Committee which released the new Future Story in 2022 – over 2 years ago, **this is very disturbing**. Sadly, the Future Story is not mentioned again until D8 Sustainable Development (page 239) where it is stated “the goal is to implement the Future Story in the following policies”; however the policies that follow are unchanged from 2016!!!

The Bold Actions and policies of the Future Story **must** be engrained in this Plan up front and throughout! CANN made some important points and the OP should be strengthening its tree canopy and green development policies, etc as CANN suggested.

Likewise, the Town’s progress and many plans and associated policies should be outlined and incorporated into the guiding principles, goals and objectives right up front. These policies include (in no particular order):

- Municipal Strategic Plan
- Transportation Master Plan
- Draft Drainage Master Plan
- Leisure Activities Master Plan
- Economic Development Master Plan
- Climate Emergency Declaration
- Natural Heritage Inventory and Natural Asset Plan
- Housing Crisis
- Housing Needs Assessment
- Water and Wastewater Allocation Policy (WWW)
- Proposed Community Wide Design Guidelines
- Community Improvement Plan
- Proposed Community Planning Permit System

Many of these provide fundamental policies that the Town has, or soon will create, which could offer strategic direction and have huge impacts on goals and objectives, planning policies and complete community building.

Community Structure

The Community Structure plan sets the tone for planning. Neither the Town or the OP have any URBAN areas. The OP is clear on outlining settlement areas and differentiates these from urban areas. I believe the message from the community is clear – we do not want to be considered “urban” and we do not want urban standards applied.

Please remove the term “urban” where it is used in the OP! It is not defined in the glossary and should not be used and should be removed from A3.4 – Community Character.

Furthermore, I echo the school boards comments that better planning is required for schools as well as roads, active transportation and safe neighbourhoods. Better planning is important for complete communities. This type of planning is not too evident in this plan because planning is editing an 8 year old model.

Housing

On the subject of housing, Section A3.11 titled Affordable and Attainable Housing has desirable goals but these 2 critical terms do not align with the details in D7.3 Housing Mix and D7.4 Affordable/Attainable. While both are defined in the glossary I find the definitions confusing and where should each occur and under what conditions?

Section D7.3 Housing Mix has no content. This should be the section where the Housing Needs Assessment Study fits in and defines the needs and mix desirable for TBM.

D7.4.b needs clarification. D.7.4.b should read; “The Town will plan to achieve and provide for affordable housing and attainable housing by: b) setting (instead of “planning to achieve”) a minimum target of 30% of new housing, or units created by conversion, to be affordable.”

More work must be invested in this critical Housing Mix and Affordability issue to deliver proper strategic and planning solutions.

Section B2.13 Building Height also needs more work. Council and staff know this is a very contentious issue. This section has too many ambiguities to be workable. I offer one example – B2.13 says heights shall generally be three stories or 11 metres, it also says “buildings greater than three (3) storeys may be permitted through a site specific Zoning By-law Amendment” which implies heights over 3 stories (with no metric limit) could occur anywhere, all over Town and the maximum height will not be determined in the OP stage.

Furthermore, the SGL statement that 5 stories shall be acceptable in Thornbury because it must have a 12-16metre setback is not written in this section or anywhere else so does not seem to apply here or every where. Height section is very misleading.

This version of the Official Plan clearly promotes Intensification. The glossary defines intensification as “the development of a property, site or area at a higher density than currently exists”. The building height and density sections already promote higher intensification than has

existed for 10 years, yet this plan seems to promote intensifying beyond the new densities. It is most confusing.

More importantly, this section **does not** require any community benefits such as affordable housing be provided for intensification to be justified as promised by SGL.

Both Building Height (section B2.13) and Intensification (B2.16) need much clearer linkages to the Community Wide Design Guidelines. In conversations at the Open House these guidelines were promised imminently and are promised to be strongly linked to the OP. However, the reference to the Design Guidelines are few and weak where it does occur. Finalizing the Design Guidelines and subsequent community endorsement of these are necessary to accept any changes in height, density or intensification.

Density in Residential/Recreational Land use Designation

The Density tables on page 84 **NEEDS** review. While proposed in Phase 1 (hence red redrafting), it was not approved ahead of completion of Phase 2, therefore can be revisited.

Firstly this significant increase in density **is not** tied to any affordable housing criteria nor any other community benefit. Compact development is not even mentioned. Open space component is still the same at 40% primarily due to the great and significant environmental features in these areas.

These tables permit minimum 10 and maximum 15 units per hectare, which is a 50% increase in density, in most areas in Craighleith, Lora Bay Camperdown – all the green areas in Community Structure map. I have worked with developers who rarely work to minimum density! So that means a project, now draft approved for 200 units, could go back to the table and apply for 300 units based on the changes in the OP **and not because they are providing anything affordable!** Affordability or other community benefits are not required. This is not what I understood was intended.

Furthermore, 50% more density is **an excessive** increase AND an unjustified change – we have met the growth with what we have! 10-12% increase might be tolerable.

In addition, the second chart on pg 84 confuses the site planning as it permits up to 100 units per hectare for multi units. Which has priority; the 15 units per hectare or the 100 units per hectare? The math is impossible to deliver 12 units per hectare overall while permitting 100 units for an apartment – a 8.3 hectare site is needed with mostly building and parking on it! The result would be huge apartments (not affordable) because the other land criteria is 40% open space – so 60% of the 8.3 ha would be paved or building! So wrong.

There is too much ambiguity; clever folks will read into the OP that 100 units per hectare can be proposed and get more than 3 stories based on a simple zoning amendment.

Should the goal here be to have more compact neighbourhoods, then that should be outlined **more clearly** perhaps by increasing open space percentages to 50-60% up from 40% rather than increasing density.

While a maximum of 4 to 5 storeys are being considered along Highway 26 in Thornbury, the Commercial Corridor designation has changed from Highway 26 in the Thornbury area to the Craigeith Village/26 corridor. Does that mean that the proposed increased heights apply to Craigeith? Will the 12 to 16 metre setbacks from Highway 26 and a 45-degree angular plane from lot lines apply? Clarity is needed and these setback parameters must be clearly imbedded in the Height section and associated permissions.

I do not support 5 storey buildings anywhere except where already permitted in the Blue Mountain Village Resort Area.

Highway 26 Corridor and Georgian Trail

This section speaks to the two items together. The highway corridor should plan for more development at only the two nodes on the corridor namely Craigeith Village and Thornbury – no intensification should be permitted in any other location. The concept over the past few years has been that HWY 26 should be considered a parkway with views to the escarpment and bay etc. preserved and volume/access be limited. This should be clearly stated within the OP.

Furthermore, the Georgian Trail that parallels Highway 26 has been mentioned several times as a linear park. This should be reinforced in the OP. There should be a goal to preserve it for active transportation as well as support/increase year round recreational use and access to side trails and paths all along the Georgian Trail.

Protection of Natural Heritage Features B5.2

The 2016 Official Plan Goal #2 A3.2 Natural Environment **is unchanged** in this version from 2016 and says, “To protect and enhance significant natural heritage features, areas and functions in the Town and to work towards the establishment of a Natural Heritage System”. Staff have virtually completed the Natural Heritage System for most areas. The wording should reflect this progress **and** the findings from the completed Natural Heritage Study and Natural Asset Inventory **must** be integrated and implemented in the OP urgently.

Intensification and efficient land use in the settlement areas requires protecting our valuable and unique natural heritage features, including wetlands, watershed, woodlands, tree canopy, and other natural assets. I look forward to the promised completion of the Natural Asset Inventory in the settlement areas, along with policies on protection and enhancement therein.

I understood that the findings of the Natural heritage System would also change what is required in an Environmental Impact Assessment and thus section C9 would need modification but this update not yet evident.

Regarding C4 Source Water Protection

There is considerable new info in this section yet no mention of Drainage Master Plan or erosion control. As I highlighted almost a year ago there is considerable runoff from watercourses in Craigeith entering Georgian Bay near public beaches and water intake sources. These areas

should be identified as Source Water Protection Zones and monitoring policies be put into place for the protection of the public.

Regarding B5.4 and C5 Stormwater Management

For a number of years I have been voicing that SWM ponds, currently designated Open Space, need a new recognition and designation. While they offer views and potential to wildlife, SWMP are a hazard. SWM ponds are built to control flooding (like a wetland), require setbacks from development and need human monitoring and maintenance to prevent disaster. As Section C5 pg 180 (of redlined version) recommends (**and did so in 2016**), a new designation should be made. This Official Plan must name SWM ponds as “Hazard” or “Environmental Protection” in Section B5.

C8 Watershed Planning

This section is **unchanged** from 2016. No mention of the Drainage Master Plan or the Natural Heritage Inventory either! We learned in the background paper on Climate Change that more extreme weather events must be anticipated. Therefore, we must do more to protect our area, our watercourses and the Bay!

The 2016 objective of Watershed Planning **was and still is in 2024** to “support the preparation and implementation of Watershed and Subwatershed Plans within the Town and the surrounding area”. The wording is 8 years old, the same as 2016 and has not been done in the intervening years. How do we implement this, set a target, and get it done??

Thank you for your consideration of these comments. I celebrate that there has been considerable advancement within the Town to identify and develop a position on Climate Change, Housing Mix, Sustainability as well as Environmental and Natural Heritage Protection – this advancement is not clearly evident in this Official Plan. Changes must be made to this version of the OP to add and clarify policies based on the many comments.

Unless this OP is crystal clear then if Planning decisions are uploaded to the County and TBM loses control, then ambiguous terms will cause misinterpretation and lead to outcomes we will not want.

Finally, I can not support the changes to density, height and intensification within this version of the OP. Much more clarity and integration of other TBM departmental approved policies is necessary. Better definitions and references to existing plans, policies and design guidelines is necessary before any increase in growth can be understood and implications accepted.

Truly,

Pamela Spence

209691 Highway 26, Craigleith

Member of Craigleith Working Group and BMRA

Attached - Specific page by page notes for consideration

September 10, 2024 Draft RED-Lined Official Plan Comments

Page by page suggested changes –

- Page 16 States growth is forecasted to be 3590 additional units by 2046 but last sentence says “It is estimated that 80 to 85 percent of these 1,370 units will be provided in urban areas (i.e. the Thornbury/Clarksburg settlement areas”. We know 93% of growth to date has been in residential/recreational designation. **This must be corrected!** This also changes a fundamental principle in the OP as to where growth will be going!
- Page 17 implement declaration of Climate Emergency into Vision or Principle
state TBM as second fastest growing area and the pressures associated therewith
- Page 18 replace urban with settlement areas
replace Sustainable Path with Future Story and associated new learnings or policies
- Page 19 incorporate plans & policies of TBM since 2016 that are/must be guiding principles
Incorporate in appropriate guiding principles that in order to create complete communities, TBM needs school(s), employment areas for the additional 1600 jobs, services in the settlement areas such as Craigeith and other fundamentals of the plans and work since 2016.

(NOTE: the word “urban” is not used in any of these principles)
- Page 23 is residential/recreational land use designation in Craigeith same as Lora Bay or Swiss Meadows? Are these resort-related still or more lifestyle communities of full-time residents? Craigeith Village is part of commercial corridor (A4.14)?
- Page 24 Highway 26 Spine or Corridor?
- Page 25-26 A3.1 - Change to set goals based on The Future Story
- Page 27 A3.2 - Change to recognize and implement Natural Heritage Inventory & Natural Asset Plan policies
- Page 28 A3.3 – Change to strengthen goals as per Climate Action now Network recommendations
- Page 29 A3.4 - Strengthen to support and implement Water/Wastewater Allocation Policy
- Page 30 A3.5 – Remove “Urban” from title of section
Change to read – “A3.5.1 Goal -To protect and enhance the character of existing ~~urban areas~~ communities.”
A3.5.1.6 remove “consider “and replace with “must include”

A3.5.1.6 Bullet 2 - Community Wide Design guidelines should be stand alone objective and not labelled as “consider” but “must abide by”

Page 31 Rural and Open Space Character must recognize Natural Heritage Inventory findings and conform to Natural Asset Plan

Page 33 A3.8 should include objective that recognizes the Craigleith Village economic needs

Page 34 A3.9 Tourism objective should include housing and transportation related supports

Page 35 A3.10 should reference and include Water/Wastewater Allocation Policies

A3.10.5 strengthen “should” to must and clarify “supplement tree canopy”

Page 36 A3.11 must reference and implement findings from Housing Needs Assessment and support Community Improvement Program (CIP) and Community Planning Permit system (CPPS)

Page 39 Remove “Urban” and replace with “Community”

Page 40 Remove “urban” and replace with community or settlement

Term Commercial Corridor used but Highway Corridor used elsewhere – which is it?

Page 42 A4.1.15 Future Secondary Plan is different from A2.3

Page 43 A4.3.2 could define & include Stormwater Management Ponds in this designation

Page 53 B2.7 includes garden suite in preamble but B2.9 removes garden suite; need clarity

B2.7 e needs clarity; are ARU permitted on well and septic? Same for B2.9

Building cluster should be defined

Page 54 prefer stronger wording such as “planning” not construction and “should” to be replaced by “will” and “up to two ARU to be “roughed in”

Page 55 B2.9 end paragraph permits more than 4 units; is that wanted? What terms apply?

Page 57 B2.12 Building Height must have greater clarity.

Buildings greater than 3 stories are only permitted in the one location outlined in Thornbury but there is no mention of the 12-16m setback promised by SGL **and** there is no mention of conforming to the Town’s design guidelines

There is no requirement that community benefits (ie affordable housing) must be provided for the increased height permissions

Metric measures should always be given with number of storeys

These two paragraphs conflict (and 1st precedes 2nd):

“Buildings greater than three (3) storeys may be permitted through a site specific Zoning By-law Amendment, provided the following height criteria and general intensification criteria set out in Section B2.14 are met:”

And

“Development above three (3) storeys outside of the Downtown Area designation will require an amendment to this Plan.”

- Page 60 B2.16 Intensification does not deliver what SGL promised. This section permits intensification **without** requiring any community benefits contrary to WWW Allocation such as affordable housing, green development standards or other requirements of the Town
- Definition of Intensification in Glossary permits greater density than that which is permitted in the OP – is that the intention??
- Says intensification alone without community benefits justifies higher than 3 stories
- Need reference to community design guidelines here
- Last paragraph on page 61 should reference CPPS
- Page 61 B2.17 Greenfield must defer to Community design guidelines
- Last paragraph justifies seeking more than 3 storeys without attaching this permission to any community benefits
- Page 62 how will Town promote employee housing? Employee Housing should be tied to community benefits in WWW allocation policy and community design guidelines
- Page 63 B3 – drop “Urban” from title
- B3.1 adherence to community wide design guidelines must be included in criteria
- Page 68 remove “Urban” from Employment Area
- No employment lands are designated outside of A-2 Thornbury Clarksburg area
- Page 76 Downtown – Section B3.3.5.3 discusses height which in other sections is limited to 3 stories but then gets into discussing outside of downtown areas 4-5 stories are permitted. It should not be included here as it is outside this section – save for appropriate land use designation. Policy is that in Downtown land use designation height is maximum 3 stories!
- B3.4 Commercial Corridor used to apply to Thornbury but now applies to EXISTING commercial properties in Craigeith. That designation on the mapping is not a corridor but rather identifying spotty locations of existing businesses. This should be changed.

Conflicts with height provisions with no criteria or setbacks as per corridor restrictions (B3.3.4.1 j) along Thornbury's Highway 26

- Page 78 Section B3.4.5 must have some reference to design guidelines and design criteria for new construction/development
- Page 84 Change density from maximum 20 units per hectare in Blue Mountain Village Area to 17 and in all other areas change from maximum 15 to maximum 12 units per hectare.
- If agreeable that SWM ponds are Hazard Lands then add sentence that for the purposes of calculating open space, a SWM pond may be included in the OP provision
- Remove column with density range on second chart but retain max. heights. If necessary, add a sentence similar to BM Resort designation such as "Maximum density for any block shall not exceed 25 units per gross hectare."
- Residential Recreational Land Use designation requires better references to design criteria and to Community wide design guidelines
- Page 109 Section B3.12.3.2.1 a) permits additional residential units but **conflicts** with B3.12.3.2.1 b) which puts a maximum number of units on designations. Permissions have already been granted on number of units.
- Page 152 Section B5.2 should be rewritten based on policies in Natural Heritage inventory and plans
- Page 162 Section B5.4 Hazard Lands should add Stormwater Management Ponds to this category. SWM ponds fit this description perfectly.
- Page 173 Incorporate references and policies of Natural heritage Inventory and plans.
- Page 176 C4 should be expanded to include water quality related to public beaches. Protection must be given to ensuring water quality is not compromised for the safety of residents and visitors
- C4.4 Significant Threats should include excessive erosion that would compromise water and public assets of the Town
- Page 180 Are there no more up to date manuals than 2003 on stormwater based on climate mitigation measures???
- Page 182 Watershed Planning was to be taken on based on wording of 2016 and nothing in this section has changed yet it is deemed a priority. Change this for stronger language to put some fire into this and set targets!

Page 185	The Natural heritage Inventory and Natural Asset policies were to improve the criteria for Environmental Impact assessment. Please insert these new policies here OR at least reference them so that when available they can easily be implemented and enforceable.
Page 194	Introduce WWW Allocation Policy so that community benefits are enforceable.
Page 220	5.2 Design Policies should ensure all developments Must (not should) respect all the design plans and policies that the Town has when proposing a project.
Page 222	D5.5 Views and Vistas should be elaborated so that setbacks referenced in Thornbury policies and elsewhere to enhance views can be reinforced here. Mentions 10m buffer on Highway 26 when 12-16 m setback is mentioned in Thornbury area – which is it?? CONFLICT!
Page 226	D6 Parkland should reference the Leisure Activities Plan and designate Georgian Trail as a Linear Park.
Page 226-7	Rework because Parkland dedication explanation is very confusing
Page 229	Parkland development must have policy that no clear cutting. No work can be done without approved park plan in place.
Page 237	D7.3 Housing Mix must have content. Reference Housing Needs Assessment and introduce targets and types of housing – size, tenure, variety etc. D7.4 definitions of Affordable and Attainable in this section are not the same as in the Glossary. Rework section to tie to Housing Needs Assessment work and to targets and goals therein. Introduce community benefit requirements of WWW Allocation Policy. Tie in Community wide design guidelines.
Page 239	VERY DISAPPOINTING. D8 Sustainable Development is the same as 2016. The policies in this draft are the same as 2016 therefore wrong. This section must be reworked to align with the Future Story policies and the suggestions of CANN!
Glossary	Affordable and Attainable Housing definitions need some rework. Clarity is need to definitions, longevity of affordable or attainable status, consequences of sale or ownership changes, sunset clauses if bonusing is given etc. Intensification should not have an increase to density reference! Natural Heritage System should incorporate/conform to the Natural Heritage Inventory and Natural asset planning that has/is being done in TBM. Settlement Area definition is inclusive of Residential Recreational area not Resort! Stormwater Management Pond should be a Hazard zone or a new Environmental Protection Zone designation

Shawn Postma

From: Web Committee
Sent: October 15, 2024 9:55 AM
To: Planning General; Shawn Postma
Subject: Webform submission from: Contact the Official Plan Review

Submitted on Tue, 10/15/2024 - 09:55

Submitted by: Anonymous

Submitted values are:

Name:
Richard Lamperstorfer

Email:
[REDACTED]

Share your feedback regarding the Official Plan Review:

my October 15, 2024 comments. Planning staff recommended four- to six-storey buildings, period. the Consultant report suggests five-storey maximum, four- maybe three- now, depending on how much NIMBY-noise, how much BMRA spotlight's time, others against the MZO-Campus of Care five- , it's density.

Further, the consultant suggestions of stepped-back fourth floors and up, be 45 degrees, greater set-backs from

roadway defy common built form. So, yet again, pressure from the same voices above, the same voices that prevent

sensible environment friendly attainable efficient buildings, form, a developer may actually choose, choose to build.

Further, the consultant appears now to toe the lines only three-storey limit from Wellington to Victoria St., with the BMRA's

supposed 500 plus email list leading the charge, other NIMBY groups, and Pamela Spence / her groups, leading the charge.

I am against limiting storeys, and height(which doesn't get talked about by the way) and shall APPEAL that lesser storey decision to

the Province. The Municipality is overlooking provincial mandate to address the "housing crisis", their own edict. While "character"

may matter to characters' that will profit off the "owned property" for another sort-of frozen 20 years since Far Hills condos on Beaver Street South completion, the County suggests "more density", and height suggests affordability, walkability, and the Province will "likely" hear my appeal, logic, it being their appeal too, being your mandate, to approve, to BUILD, housing.

(likely i missed something here, but i said it before likely, and it will likely be in my appeal)

Thank you. Richard Lamperstorfer

nearby neighbours. Why?

I would like a copy of my submission sent to my email address.

Yes

Any accompanying files are attached.



GEORGIAN TRIANGLE DEVELOPMENT INSTITUTE

October 15, 2024

Mr. Adam Smith
Director, Planning & Development Services
Town of the Blue Mountains
32 Mill Street,
Thornbury, ON N0H 2P0

Subject: GTDI DISCUSSION POINTS FOR REVIEW WITH TOWN PLANNING re: TOBM OP Update

Dear Mr. Smith,

Please consider this our formal submission regarding the Town of the Blue Mountains Draft Proposed Official Plan. Since the Public Meeting held on October 1, 2024, we have consulted with our membership and are providing the following detailed list for discussion. We look forward to engaging with the Town in a meaningful and collaborative manner to address our questions, supporting the orderly development and anticipated growth of the community.

We have taken the opportunity to cc: the County Planning Department on our submission as we feel it prudent as their role as the Town Official Plan Approval Authority, the need for the Town Official Plan to be consistent with the County Official Plan, and the County's proposed OPA 23 Rural Land Designation.

1. The Draft Official Plan introduces new restrictive policies on density ranges and maximum height by unit type for the Residential Recreational Area designation (Section B3.7.4.2, page 84). Although the density ranges generally match industry standards per dwelling type, it must be noted that to achieve an apartment type density of 100 units per gross hectare within a three-storey height restriction is going to prove to be difficult to implement.
2. Introduction, pp.15-17. The following terms are used interchangeably "household", "dwelling unit" and "unit". None of these terms are defined in the Glossary (Section E11, p.280). "Unit" or "Dwelling Unit" should be used as these terms are commonly used.
3. The population numbers in the Introduction section need to be clarified so that the basis of growth is clear.
 - a. The basis and distinction between types of population needs to be clearly made. It is assumed (but not stated) that "population" in this Introduction is "permanent population".

- There is also a significant “part time” or “seasonal” population base in the TBM. Minor reference to “seasonal” population is made in the first para p. 16. The demand for hard and soft services that this Official Plan must account and plan for is largely a result of both population types. Making and quantifying the composition of the TBM population is critical for the Official Plan. It is noted that seasonal growth is acknowledged and discussed in the Grey County Official Plan (Section 2.1).
- b. “Seasonal Households” is not a defined term and is first referenced in the first para on page 16. In this reference, the draft Official Plan states that the number of seasonal households is anticipated to decline by 80 units. The draft Official Plan is unclear with respect to seasonal households. Nonetheless, given the significant role the TBM plays in meeting the market demand for the recreationally oriented second home sector it is highly unlikely that there will be decrease in seasonal units. What is the basis for forecasting the decline?
 - c. The last sentence of the first para on page 16 states “1,370 units”: it is unclear what this number refers to or how this number is arrived at.
4. The Introduction does not provide a simple framework or guidance on how to read the Plan. For example, the Introduction could make it clear that in reading the Plan, all relevant policy directions are to be considered and weighed and, that often times, a one policy alone will not determine if a matter conforms to, or is contra to, the intent of the Official Plan.
 5. In discussing the overall intent of the Official Plan (page 17), it is noted that the agricultural sector of the TBM is not referred to. Although this section is to be high level, the agricultural sector would ideally be mentioned.
 6. Guiding Principles number 9 (Section A1.1, page 19) includes an added new proposed wording: *The provision of affordable housing will be a priority in new residential and mixed-use developments.* The provision of affordable housing is a priority for the Town overall. Referencing new and mixed-use developments is too specific and incorrect as a guiding principle, representing an implementation matter that is addressed more appropriately in later sections of the Plan. It is respectfully suggested that this new additional sentence be worded as “The provision of affordable housing will be a priority for the Town.”
 7. In Section A3, Goals and Strategic Objectives, the Plan correctly describes “objectives” as intended to be “specific and realistic targets that measures the accomplishment of a goal”. As an overall comment, there are many strategic objectives in this Section that fail to meet the fundamental tests of what constitutes an objective in the context of the Plan. That is, many of the objectives in A3 are not specific and cannot be measured. Examples: **A3.1.2** – 1, 2, 3,4,5, 10, ; **A3.2.2** – 1, 2, 3, ; **A3.5.2** – 1, 6, 7, ; **A3.8.2** - 1, 2, In addition, the establishment of objectives brings with it an obligation to monitor and report on how those objectives are or have been met. The sheer number and diversity of objectives makes this an unrealistic endeavour and requires and vast amount of human and technological resources.

8. Sustainable Development Strategic Objective number 15 (A3.1.2, page 27) states that it is a strategic objective of the Plan to encourage the use of “Green Development Standards” in designs. “Green Development Standards” is not defined in the Glossary. As an objective how is this required objective considered clear and concise and how is to be measured? Where does the Plan provide clarity as to what constitutes “Green Development Standards” and more specifically, what does it refer to when noting “environmental, social, and economically sustainable designs”. This is too vague to use as a means of assessing a proposal or a plan.
9. What is meant by “net gain enhancements” in Strategic Objectives A3.2.2 1. (page 27)?
10. The Goal statement in section A3.3 contains a superfluous and extended prologue on the political underpinnings of the climate change action plan. For Official Plan purposes it is respectfully suggested that the goal statement is simply the last sentence in the paragraph. The first two sentences can be deleted for clarity and without compromising the true goal statement.
11. Under Economic Development (Section A3.8, page 33) strategic objective A3.8.2 4. seeks to “streamline development reviews”. Generally, all avenues to streamline reviews need to be considered to reduce red tape and unnecessary cost and time to both the Town and the private person. The Plan further details such avenues in Section E.1. and these measures merit support.
12. How will the Town “ensure” a full range of housing “for those who work” in the Town (strategic objective A3.11.2 4, page 36)? To gear an objective strictly on the basis of where one works is, respectfully, inappropriate and unrealistic. Presumably, the combination of other strategic objectives in conjunction the plethora of additional related Plan policy would attempt to address the need for housing for all people.
13. Have First Nations commented on the draft Plan? Have they commented on Strategic Objective A3.13 11 (page 38)? What does the Draft Plan mean by “may affect matters of mutual interest and concern”? The Draft Plan wording is too vague. A sufficient strategic objective statement would be to “Improve consultation with Indigenous Communities in the early stages of development plans proposals and studies”.
14. Section B2.7 (page 53) introduces enabling policies for the provision of additional residential units. For the most part, these policies reflect updated Provincial policy and Planning Act provisions and would increase the potential to add affordable dwellings to the TBM housing stock. However, the additional policy that appears after B2.7 g) (page 54) is unrealistic and unwarranted. Forcing the proponent of new ground-related housing to design with options for an additional two units is, in our opinion, beyond the scope and intent of the Planning Act enabling legislation. This forces builders and developers to develop additional plans and

construct additional servicing options that will add costs to the main principal unit design. A more appropriate objective would be “New ground related housing may include design options that would allow up to two additional residential units per property”.

15. How do allowances for additional residential units per the Draft Official Plan measure against the density restrictions found in Sections B3.1.4 and B7.3.4.1? How is this being interpreted? For example, if a development is approved at the maximum allowable density of 10 units per ha, and a proponent provides for 20% ARU's does the proposal exceed the maximum allowable density? Is there a specific policy statement that nullifies the ARU potential or provision from the density calculation? How does the municipal water and sewer infrastructure account for the potential increase in units?
16. Section B2.13 introduces new policies governing building height (p. 57). Generally, building heights in the TBM are restricted to 3 storeys. Five storeys may be permitted in the Downtown designation in Thornbury. However, the additional height is subject to several criteria, including Council satisfaction regarding the subjective test of compatibility. Has the Town tested these proposed restrictive criteria on sample areas to determine if in fact the policies allow redevelopment or intensification? Or, to reverse the exercise, has the town undertaking a land use review to determine “where” higher buildings are most likely to meet the restrictive tests?
17. Building heights more than three storeys outside of the Downtown Area will require an amendment to the Plan. Affordable/attainable housing usually takes the form of higher density dwelling types. How does the Town rationalize restricting potential housing forms that tend to provide less expensive housing, ie, mid rise five storey buildings.
18. The intensification criteria in B2.16 (page 59) is overly prescriptive and will discourage intensification that is at the root of updated Plan policy in other sections, for example: A1.1 4,9, 11; A3.1.2 5, 7,8,9; A3.2.2 4, 5; A3.4.2 1, 5; A3.5.2 2,4; or, A3.11.2 2,3,10,11 and D2.7. Many of the criteria in B2.16 are more appropriately addressed through design guidelines. How can the Town reconcile the requirements of B2.16 against these above note Official Plan land use objectives?
19. It is respectfully submitted that Sections B2.13 and B2.16 will combine to thwart the objectives that support land use efficiency, servicing efficiency, active transportation initiatives, re-development and a diverse housing stock. These sections should be further critically reviewed to ensure seamless alignment with policies supporting housing and land use efficiencies.
20. Section B2.17 introduces new Greenfield Criteria (page 61). As with Section B2.16 we find the criteria overly prescriptive with many elements comprising detailed design approaches belonging in urban design guideline documents.

21. B5.2.1, page 160, natural heritage feature setbacks – Comment?
22. D1.5, Monitoring of Servicing Capacity, page 198. No reference to the allocation policy approach now being considered.
23. OVERALL, SECTION D PROPOSES SEVERAL POLICIES THAT DEMAND MORE DIRECT INDUSTRY/TOWN DIALOGUE – MANY THE MANDATED REQUIREMENTS NEED TO BE REVISITED.
24. Section D7.4 (page 237) provides new Affordable and Attainable Housing policies. For the most part, the first three paragraphs in the introduction amount to a background narrative and does not constitute “policy”. The fourth paragraph, in the context of the Official Plan structure reads as a Section A4 “Guiding Principle” and as such repeats the statements and directions provided in Section A3.11.2. The terms “affordable housing” and “attainable housing” are defined in the Glossary (Section E11).
25. D7.4 a) (page 238) requires “all development proposals with more than 10 residential dwelling units proposed to demonstrate the provision of affordable housing units”. This is unduly onerous, impractical and unnecessary. This policy ignores the reality of the private sector market realm, it effectively mandates provision of affordable housing units, it ignores other Plan policy that emphasizes policy approaches that “encourage”, it ignores Plan policy that provides less intrusive and prescriptive approaches (eg, subsections c,e,g,h) and, we respectfully note, is inconsistent with the Planning Act, PPS and County Official Plan.
26. Section D7.4 b) (page 238) is an aspirational objective. To achieve even a portion of that objective requires innovation and cooperation with the development industry. The GTDI is available to work with the Town to review opportunities, options, programs and plans.
27. Section D7.4 d) (page 239) requires a proponent to include design options providing the purchasers the ability to have two additional dwelling units. This is an example of adding more work and costs to an existing process that will most likely result in additional housing costs. This should be deleted.
28. Sections D7.4 f) (page 239) requires an Affordable Housing Report demonstrating how the requirements of the previous sections a) and b) are met. This report is also noted as a requirement in Section E10. As worded, this policy requires the industry to explain how it is to supply affordable or attainable housing that in most cases may not be able to do.
29. Apart from a myriad of external factors affecting the cost of housing, other than the cumulative effects of inflation, the apex contributor to housing costs is housing supply being unable to meet housing demand. It is respectfully noted that sum total effect of the policies proposed in Section D7.4 will be a further choking of housing supply in the TBM thus creating an inevitable further

imbalance between supply and demand. Ironically, many of the intrusive policies proposed in Section D7.4 will contribute to increased housing costs.

30. Section E1 Implementation and Administration (page 245) introduces several new policy directions and requirements. E1.2 provides policy enabling a Community Planning Permit By-law. This is a new tool for the Town and requires further review as it prescribes what the By-law is to support. The GTDI is concerned that the prescriptive nature of the proposed policy may result in a By-law that could be susceptible to challenge.
31. Section E1.3 (page 251) would enable delegation of By-law approvals that are minor in nature to the Director of Planning Services. As a direction this is supported by the GTDI. However, the action is of little value if the process and information requirements remain as demanding and complex as the existing process.
32. Section E1.4.1 (page 252) also proposes delegated authority to pass Temporary Use By-laws. As with above, this is supported by the GTDI with the caution that the process requirements be streamlined.
33. E1.5 Holding Provisions (page 253) introduces a new policy regarding types of conditions that may be applied to Holding (h) zoning. This needs to be reviewed in light of the Planning Act as the new policy includes the words “and all other planning matters determined to be relevant to the development of redevelopment of the lands.” How is this open ended provision allowed under the Planning Act?
34. E1.5.2 (page 253) is redundant.
35. E1.5.3 (page 253) delegates authority. GTDI has the same commentary as per the previous delegated authority policy proposals.
36. Section E1.8, Public Participation (page 255) introduces new policy requiring provision of a public consultation strategy by a proponent of development. The policy far exceeds the requirements of the Planning Act and results in an unduly onerous additional demand of a proponent. Other than meeting the requirements of the Planning Act, additional public consultation has generally been at the discretion of the proponent. The proposed policy is a means of requiring a proponent to undertake a public consultation process that rightfully is the responsibility of the Town to decide to engage in.
37. Section E10, Complete Application Requirements (page 272) introduces new requirements for “complete applications”. The requirements appear to be drafted prior to Bill 185 and represent an exhaustive list of requirements, consultations, and related processes. The GTDI requests that the Town advise how Section E10 requirements are enabled through the Planning Act.

38. Have the public and separate school boards provided comments on the Draft Official Plan?

39. Have the local hospitals provided comments on the Draft Official Plan?

40. Have emergency services comments on the Draft Official Plan?

Our industry is a key participant in the development of the Town. It has the benefit and perspective of working with Official Plan land use policy, working within the marketplace and planning and developing homes and communities for future populations. We have offered the above comments with experience and future improvements in mind. As noted in the introduction, we look forward to further engaging with your offices to review this submission.

Regards

GTDI



October 15, 2024

To: Adam Smith, Director of Planning & Development Services
Shawn Postma, Senior Policy Planner
Corrina Giles, Town Clerk

From: Betty Muise, Tree Trust TBM

Re: The Official Plan Review, Public Meeting October 1, 2024

Thank you for the opportunity to provide the following comments regarding the TBM Official Plan Review process:

Tree Trust TBM is a registered charity and part of an expanding network of chapters across Ontario. We have been active in TBM since 2020, initiating, managing and participating in numerous tree care, tree protection and tree planting programs. Town Council and Staff are well aware of the widespread public support and engagement behind these programs, and the importance of tree canopy protection and expansion in TBM.

One of the assets Tree Trust brings to the Town is specialized expertise in the care and preservation of established trees. Preservation must be prioritized as our established trees are the main pillars of our tree canopy, providing the bulk of essential environmental services, including carbon sequestration, shading and cooling effects, pollution interception, natural habitat, etc.

Historically, land use policies and regulations have underestimated the importance of established trees, and overestimated the contributions of tree and shrub planting requirements. Our recommendations are focused on establishing tree preservation as a priority.

Our recommendations address Town of the Blue Mountains Official Plan Section D8.2 TREE CANOPY:

- Add language to recognize *the critical role of established trees* in environmental protection, climate change adaptation/mitigation, and maintaining the natural beauty, recreational amenities, and identity of our Town. Language should acknowledge the importance of large, established shade trees vs ornamental shrubs.
- Add policies to ensure that the preservation of existing trees is a priority in all development on public and private lands in TBM.
- Add policies to guide and enable a Tree Protection By-law applicable to all TBM Settlement Areas.
- Add policies to prevent clear-cutting of trees on developable lands. Mandate the preparation and approval of a Tree Inventory and Tree Preservation Plan as part of the development approval process. *These documents must clearly identify mature trees by DBH (diameter at breast height) and include measures for their preservation. Native, healthy species and trees with an estimated age of greater than 40 years should be highlighted and alternatives to removal considered and incentivized.*



- Ensure that tree removal is permitted only as specified in an approved Tree Inventory and Tree Preservation Plan. If removal is necessary, a high replacement ratio should be required based on cumulative DBH of the tree removed, not a stem ratio, which significantly under-represents the ecological value of mature trees.
- Ensure that tree canopy protection and enhancement is fully integrated within Community Design Guidelines.

I hope these recommendations are helpful. Please feel free to contact me if I can support efforts to prioritize tree preservation in the revision of the TBM Official Plan.

Betty Muise
Tree Trust TBM

Shawn Postma

From: Colin Travis [REDACTED]
Sent: October 21, 2024 12:09 PM
To: Shawn Postma; Adam Smith
Cc: Samer Chaaya [REDACTED]; SAL CHAAYA
Subject: Additional comments on Sept Draft OP re Aquavil lands
Attachments: Royalton TBM OP Review comments letter sept242024-ctf1pd.pdf

Hi Shawn.

On behalf of the Owners I'd like to submit comments in addition to the September 30th submission (copy attached for ease of reference).

1. In light of the Master Development Agreement we suggest that Section B3.12.3.2.1 d) be clarified by modifying the second sentence to read as: "Specifically, the dedication to the Town, or, the availability of shorefront access to the community to the satisfaction of Council for lands including 6.0metres southerly of the 15.0 metre wave uprush zone".
2. Likewise, under Section B3.12.4 d) be clarified by having the second sentence read as; " It therefore shall be a policy of this Plan to require the provision of recreational lands and/or facilities including the dedication, or availability to the community to Councils satisfaction, of shorefront lands."

Best
Colin

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October 24,2024

To: Pruthi Desai, Manager of Capital Projects
Town of the Blue Mountains

CC: Daniel Twigger, Senior Engineer, Group Leader, Tatham Engineering Limited
Adam Smith, Director of Planning & Development Services
Shawn Postma, Senior Policy Planner, Re: OPR

From: Stephen Granger
Craigleith Resident,TBM

Re: Public Input in Town-Wide Master Drainage Plan – 90% Draft Report Submission

Pruthi:

Having read the background documents and listened to the video presentation on-line as presented on the Town-Wide Master Plan Drainage Report, I have some comments and questions I'd like to submit for review concerning some content and guidelines outlined in this report at this stage of the 90% Draft report completion.

Hopefully these can be answered and considered in the final completion stages of this report before going to Council for final approval?

My points made are keeping within the core guidelines as outlined on the Town's website Re: The Town-Wide Master Drainage Plan:

- Identify existing and future drainage infrastructure deficiencies and areas of flooding;
- Develop drainage solutions to address these deficiencies, reduce flooding, resolve public safety concerns and improve maintenance opportunities;
- Evaluate the drainage solutions through a risk assessment considering costs, impacts on the environment, and input from the public and interested stakeholders;

I'm a full time resident living in the un-assumed Second Nature development of Craigleith in TBM. This area lies directly in the surrounding area of Watercourse 1 and is adjoining the Windfall, Blue Vista and Bluemont developments in this study area of the TBM.

Having read the report with all its Appendices and Maps at the 90% draft stage, I have some questions pertaining to the flood challenges currently encountered in our new development neighbourhood and how this is noted in the report.

The report appears not to illustrate our flood zone issues in the data and it is to this point a request for update completeness to this report data and guidelines be added better reflecting

Page 2

Watercourse 1 flood zone area,#1402 in the current Appendices and maps section provided.(See attached slide)

Question: Is it possible to incorporate similar maps since these exist at the Town into the Town-wide Drainage Master Plan? This way interested public ,local residents and stakeholders can easily review important respective flood zone areas within the TBM and relate this to their risk assessment concerns ?

Having reviewed the report this type of map was not available and I feel this is a very important graphic illustration required especially when builders of developments do not indicate this important information to respective stakeholders in the site plan/purchase stage in an open transparent manner. Having such document referencing with historic current information available to the public could be very beneficial. Can this be considered in the final stage of the report for inclusion? I mention this in referencing the core guidelines of the Town-wide Master Drainage plan in evaluating the drainage solutions through a risk assessment considering costs, impacts on the environment, and input from public and interested stakeholders.

Under section 13, page 206

Question:

What mechanisms in the report as noted will safeguard new developments in having necessary environmental flood zone mitigation work done by a developer/builder before properties are built? Is there a policy here being recommended or exists in the EA/Engineering/development process outlined?

As an example mentioned:

Second Nature in the graphic photo provided, has subsequently experienced flooding recently of an un-assumed development with residential properties in said zone areas. To my knowledge, this flood zone area was not evident in any public mapping provided during the site development/purchase process and the current report of the Town-wide Master Drainage Plan appears not to show this area in my review and I was wondering why as it is a documented current issue?

Does the Engineering data reflect this issue and can you clarify this as the area 1402 of Watercourse 1 doesn't appear to note this in the Final Preferred Solutions Summary, Table 22? Can this be incorporated into the report as cost remediation concerns as a project need to be clarified or noted. Can this be identified as part of the final stage of this report?

Question: With the above points made and the importance for having the Town-wide drainage Master plan as a guiding principles document to TBM will it be added to the TBM Official Plan currently being reviewed? The Transportation Master Plan is noted currently in the OPR and I was hoping this would have similar importance given to our OPR?

Also attached is Tatham report Alternative Solutions Map #7 G provided of our area.#1402 /115 respectively.

Questions/Comment:

- 1) As mentioned, not seeing in this draft report the flood zone area in the residential development areas or the 2 major culverts constructed now off Crosswinds and Windfall development , can updated maps be included in this report to better reflect our area in the final phase report?
- 2) Under table 22 of the report- Final Preferred Solutions. With previous comments made should this area not be updated in the report based on flooding having occurred recently? Could this be reflected as a priority project item for planning attention under the final preferred solution summary given the development is not assumed yet?
- 3) Comment to the above: See examples Section Existing Conditions Analysis: Under flood zone analysis, #7.5, page 31 - Private Property Drainage Issues, #5.2 , page 46 –Future Conditions Systems Analysis or the Appendix “A”, page 31 Major Drainage System Analysis.

Under Existing Policies & Guidelines of TWDMP Report:

Re: pages 3 – section 1.4

-“After the completion of the Master Plan, Schedule C projects are required to fulfill Phases 3 and 4 prior to completing the Environmental Study Report (ESR) for public review.”

Summary comment/question:

Can other graphic watercourse 1 mapping of respective flood zones be included to the report to address the need for open disclosure of potential risk to public and respective stakeholders as part of new developments?

Can this request be considered or expanded upon under section 13 in the final report stage?

comment consideration Under Section 13:

With the above said, under full transparency and disclosure to TBM residents and stakeholders can new developments under the TWDMP as part of the Official Plan be able to have complete builder site plans with all approvals and EA assessments provided especially when flood zone areas are involved?

This refers Section: 1.5.5 -, page 8- Town of The Blue Mountain Official Plan (2016) currently being reviewed and in its updating could this consideration be part of this section as a possibility?

- **Determine and describe the necessary measures required to be undertaken during construction to mitigate potential negative impact of development.**

I look forward to the open house happening on Oct/29th and receiving your feedback to my questions and comments presented as input consideration. I appreciate the public opportunity and work to-date in this process and look forward to seeing the final stage report when ready for Council approval/review.

Respectfully,

Stephen Granger



Member of Craigleith Working Group and BMRA



Planning and Development

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November 6th, 2024

Mr. Shawn Postma
Manager of Community Planning
Town of The Blue Mountains
32 Mill St., P.O. Box 310
Thornbury, ON, N0H 2P0
***Sent via Email**

RE: Comments on Town of The Blue Mountains Official Plan 5 Year Review Phase 2

Dear Mr. Postma,

County staff commend the Town of The Blue Mountains for all of the work that has gone into the proposed 5 Year Review Phase 2. We appreciate the opportunity to offer comments.

What follows, within Table 1 below, are staff comments related to the provisions of the *Planning Act*, the Provincial Planning Statement (PPS) 2024, and the County of Grey Official Plan. Additional general comments have also been included with respect to overall clarity and understanding of the Plan. The below comments should not detract from the fact that there are many wonderful policies within the plan that provide excellent intent and direction for the Town moving forward, well-reflecting the hard work and significant consultation efforts undertaken in updating the plan.

County Staff would welcome the opportunity to discuss any comments further, once reviewed by local Staff.

Regards,


Liz Buckton
Senior Policy Planner
1 548-877-0854
liz.buckton@grey.ca
www.grey.ca

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
1	B2.7	<p>ARU provisions apply to all land use designations, allowing for two ARU units in main dwelling, and one within a detached accessory structure.</p> <p>Note: Section 4.3.2 (5) of PPS 2024, Lands now states: <i>Where a residential dwelling is permitted on a lot in a prime agricultural area, up to two additional residential units shall be permitted in accordance with provincial guidance, provided that, where two additional residential units are proposed, at least one of these additional residential units is located within or attached to the principal dwelling, and any additional residential units:</i></p> <ul style="list-style-type: none"> <i>a) comply with the minimum distance separation formulae;</i> <i>b) are compatible with, and would not hinder, surrounding agricultural operations;</i> <i>c) have appropriate sewage and water services;</i> <i>d) address any public health and safety concerns;</i> 	<p>County Staff suggest that revision is required to B2.7 to:</p> <ul style="list-style-type: none"> • Clarify a maximum of two ARU's are permitted. The current wording could be interpreted as permitting a total of three ARU's. These two ARU units may both be in the main residential unit (detached, semi-detached, row) or one of the units may be located within a building or structure ancillary to the main residential building. • For Agriculturally Designated lands, any revision should reflect that where two ARUs are proposed, at least one of the additional residential units is to be located within or attached to the principal dwelling, and that MDS applies

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
		<p><i>e) are of limited scale and are located within, attached, or in close proximity to the principal dwelling or farm building cluster; and</i> <i>f) minimize land taken out of agricultural production.</i></p>	
2	B2.9	<p>This section relating to Garden Suites has been removed in its entirety.</p>	<p>Curious regarding associated rationale. Despite provisions relating to ARU's, there may still be times where a temporary/ removable unit is desirable.</p> <p>Should this be reincorporated, please note that a garden suite would be counted towards total permitted ARU's on a lot, where one exists. Section 4.2.6 of the GCOP applies. Also, the related definition should be readded within the definitions section of the Plan.</p>
3	B2.12	<p>Sensitive land uses shall be setback a minimum of 150 metres from a <i>cannabis production facility</i> unless noise and air quality studies are undertaken to demonstrate a lesser setback can be justified through a site-specific amendment to the Zoning By-law.</p>	<p>Staff suggest revision to the definition of <i>Cannabis Production Facility</i>, to reflect that these restrictions would apply to licensed facilities, and not production under personal use permissions (4 plants/residence), nor in the case of a cannabis registration or designation for personal medical production.</p> <p>With respect to the intent to apply the 150m setback from sensitive use on a reciprocal basis, perhaps policy wording could be included noting how this will be implemented. For example, will a 150m wide holding provision be placed on the surrounding lands? If so, by what process and how will those landowners be consulted? Will this be measured from buildings, or the lot line? Will accessory and agricultural buildings be permitted within this setback area? Etc.</p>

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
4	B2.13	<p>"It is recognized that residential intensification can promote a walkable community, invest in vacant and underutilized properties, minimize land consumption, make efficient use of existing infrastructure and services and provide for a broader and more inclusive range of <i>affordable</i> and <i>attainable housing</i> options. However, it is important that taller buildings are appropriately designed and are appropriate to the local context. Development shall analyze existing character, prevailing heights and constraints."</p>	<p>Staff appreciate that the intent here is likely to convey that a height increase is not 'a given' and that the building needs to be appropriately designed and sited. Staff suggest however that the creation of a full range of housing options across the entire housing spectrum including multi-residential, rental, and especially the provision of affordable and attainable housing, may well demand greater height and density so that these projects can achieve economic viability. Staff have some concern that positioning these important objectives directly against consideration of character (which tends to be rather subjective) may intensify the challenge faced by decision makers in balancing these factors, holding the status quo in place.</p> <p>Respect for the existing character is of course important. But if it is a "housing crisis" as declared by the local Council, then there rationally <i>must</i> be situations where viability could or should be more heavily weighted in decisions, so as to realize the range of housing options needed to maintain economic and social sustainability for the municipality. In these situations, we could as a community accept a carefully considered <i>evolution</i> of character, in recognition that our current built form and planning policy create practical limitations to realizing the range of housing options needed in our communities.</p>
5	B2.16	<p>Intensification Criteria Clause (f) notes 'overlook' and 'privacy' as considerations.</p>	<p>A taller building will, by its nature, have some degree of overlook. Like the comment above, Staff wonder if inclusion of these references may create additional tension for decision makers in balancing height/density,</p>

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
			character and the supply of a fulsome range of housing options.
6	B3.1.3	<p>Permitted Uses, Community Living Area</p> <p>Clause j) notes 'Day nurseries' and 'private home daycare'</p>	<p>Suggest all references to 'Day Nursery Act' and Day Nurseries, be updated to reflect the <i>Child Care and Early Years Act</i>.</p> <p>Please note that differing definitions applicable to licensed, unlicensed child care (nuance here may impact any existing as of right permissions).</p>
7	B3.1.6	Day Nurseries and Institutional Uses	Suggest all references to 'Day Nursery Act' and Day Nurseries, be updated to reflect the <i>Child Care and Early Years Act</i> . Please note that differing definitions applicable to licensed, unlicensed child care (nuance here may impact any existing as of right permissions).
8	B3.2.3	<p>Permitted Uses, Urban Employment Area</p> <p>While no redline changes are proposed here, the PPS 2024 does establish some changes as apply to designated Employment Lands, such as the Urban Employment Area designation.</p> <p>PPS Section 2.8.2 of PPS 2024, clause (3) notes that in employment areas, residential uses, commercial uses, public service facilities and institutional uses are prohibited. Retail and</p>	<p>Section B3.2.3 of the TBM identifies (b) Office Uses as permitted. It notes that accessory commercial uses are also permitted provided they occupy a limited floor area and are accessory/incidental.</p> <p>Based on PPS direction, it appears that 'Office Uses' should be removed from the permissions list, and perhaps included together with the commentary in the paragraph following item (e) something to the effect of: <i>Accessory office uses and accessory retail commercial uses such as sales outlets, are also permitted provided they occupy only a limited amount of the gross floor area and are clearly accessory and incidental to the main/primary use.</i></p>

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
		office uses that are not associated with the primary employment use are also prohibited.	<p>The following paragraph, permitting limited ‘ancillary uses’ may also require revision, perhaps to specify that they must not comprise those uses prohibited per the PPS?</p> <p>The final paragraph also requires revision/consideration – adult entertainment establishments do not appear to fit here any longer based on provincial policy.</p>
9	B3.3.3	Permitted Uses, Downtown Area Clause (k) lists ‘day nurseries’	Suggest all references to ‘Day Nursery Act’ and Day Nurseries, be updated to reflect the <i>Child Care and Early Years Act</i> . Please note that differing definitions applicable to licensed, unlicensed child care (nuance here may impact any existing as of right permissions).
10	B3.4.1	Commercial Corridor	Just a note that it’s not currently showing in the TOC – fields likely just need to be updated.
11	B3.6.3	Permitted Uses, Institutional Clause (f) speaks to day nurseries	Suggest all references to ‘Day Nursery Act’ and Day Nurseries, be updated to reflect the <i>Child Care and Early Years Act</i> . Please note that differing definitions applicable to licensed, unlicensed child care (nuance here may impact any existing as of right permissions).
12	B3.7.3	Permitted Uses, Residential/Recreational Area Clause (h) references ‘private home daycare’	Suggest all references to ‘Day Nursery Act’ and Day Nurseries, be updated to reflect the <i>Child Care and Early Years Act</i> . Please note that differing definitions applicable to licensed, unlicensed child care (nuance here may impact any existing as of right permissions).

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
13	B3.7.4.1	Density and Open Space Requirements; Residential/Recreational Area	<p>Staff request clarification.</p> <p>How are the min/max density and open space requirements in the blue table, intended to relate to the newly added table below which outlines permitted density ranges and max heights for permitted residential dwellings by type?</p> <p>For example, the bottom table outlines that Townhouses are permitted at a density range of 25-50 units/gross ha, however in the blue table above, the maximum permitted density is noted as 20 units/gross ha in BM Area and 15 in other areas. Does this mean that this unit type cannot be accommodated? Similarly for multiple & apartment dwellings noted as permitted at a density range of 40-100 units/gross ha per the lower table.</p>
14	B3.10.9	<p>General Dev Policies (Village Resort Area)</p> <p>Clause (j) speaks to SWM in consultation with CA, MNR, and/or other applicable agencies.</p>	<p>Staff request that Grey County be specifically identified here (and in similar clauses across the plan). Given our redefined ecology/natural heritage role, County Staff will be engaged regarding water quality considerations, as well as in relation to any significant groundwater recharge areas or highly vulnerable aquifer areas, potentially alongside the Risk Management official. The Conservation Authority would continue to be engaged around stormwater quantity and hazard considerations.</p>
15	B3.10.9	<p>Clause (s) speaks to MNR, NEC, GSCA for endangered, threatened, special concern, rare species.</p>	<p>As above, Grey County ecology is now tasked with offering comment and consultation relating to species per clause (s) and in relation to natural heritage</p>

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
		Clause (t) speaks to no development within 30m of watercourse 1 (Craigleith, Camperdown) including removal of vegetative cover, without approval from GSCA, DFO if applicable.	components of (t). Please add Grey County to the lists of parties involved.
16	B4	Rural Countryside Designations	Staff suggest generally that this section of the Plan could be reorganized for greater clarity and ease of interpretation. Similar work was undertaken in recent update of the Municipality of Meaford's Official Plan, with the countryside policies being arranged so as to describe agricultural use permissions and policy tests; agriculturally-related use permissions and policy tests; and on-farm diversified use permissions and policy tests, with specified permissions/policy directions nested under each respective category of use.
17	B4.1.1	Accessory residential uses on Farm Properties	<p>Staff suggest that this section doesn't capture the full range of accessory residential use on Farm properties, focusing only on permission for one additional dwelling unit, or trailer/mobile home for farm help purposes.</p> <p>Other uses such as ARU's (rural, ag special ag), Garden Suites, and temporary farm help accommodation could also fit here.</p>
18	B4.1.2	Agri-tourism uses as On-Farm Diversified use (OFDU)	<p>OFDU's are size/scale limited per Table 8, Grey County Official Plan (GCOP), these scale requirements are not reflected within the policies of the local plan.</p> <p>Staff suggest that the plan could include reference to the OFDU sizing considerations and applicable OFDU siting and sizing policies of GCOP.</p>

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
			<p>Importantly, OFDU's are not permitted on Ag lands less than 20ha in area, or on Special Agricultural lands with less than 10ha of agriculturally productive area (except for B&Bs and home occupations within the dwelling).</p> <p>Size requirements apply per Table 8 GCOP, generally with the OFDU not exceeding 2% of the lot area; and associated buildings not exceeding 20% of the total OFDU footprint on the lands. There are maximum square footages also noted within the table.</p>
19	B4.1.3	Estate Winery	<p>A winery is a combination of Agricultural and Agricultural-related use, with OFDU policies/considerations applying for any tasting/hospitality components. Staff suggest these policies will need to be revised in a minor fashion, so as to ensure consistency with the updated OFDU framework and building size, footprint and lot size relationships.</p> <p>The 'winery' component is an ag-related use and so would not be size-limited by policy, however a tasting room or similar hospitality use component would be considered under the OFDU policies, and thus size considerations apply (e.g. on lands greater than 20ha in Ag; 10ha in Spec Ag). A retail component relating to sale of products produced by the farm operation, on the farm, may fall under the category of ag-related use (size-unlimited) however Estate Wineries often include broader retail offerings e.g. "<i>wine related products</i>" which may not meet the definition of ag-related use and</p>

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
			<p>would be better considered under the OFDU policies alongside hospitality uses.</p> <p>With consideration to the existing estate winery policies, for a lot of 8ha: $8\text{ha} \times 2\%$ (max. ofdu footprint) = $1600\text{m}^2 \times 20\%$ = 320m^2 building area max. per sliding scale sizing under OFDU framework.</p>
20	B4.1.4	Farm Winery	<p>As above, again for clause (c) staff recommend that revision be considered to place permissions in context of updated OFDU framework and size and lot size relationships.</p> <p>For this item, and Estate Winery above, may refer to updated Meaford OP – we worked through some similar OFDU/Winery considerations via their recent OP review and update process.</p>
21	B4.1.8	Small Scale commercial or Industrial Uses	<p>This framing comes from prior GCOP and Provincial policy frameworks and doesn't reflect current permissions on a standalone basis. Such uses are either farm-related comm/industrial (Ag-related) or are OFDU uses (per OFDU policy tests and scale limitation).</p>
	B4.2.4.1	Creation of new lots (Ag)	<p>Para on Page 133 notes that smaller parcel sizes may be available of a size that is appropriate for the type of ag use.</p> <p>Staff note that Section 5.2.3 of the GCOP goes into detail here, speaking to justification required, which</p>

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
			<p>includes provision of an Agricultural Report by a qualified individual, addressing certain criteria. The local plan could be perhaps a bit simpler, just noting that a smaller parcel may be considered by OPA (to County OP also) s/t policy tests outlined within GCOP.</p> <p>Note also: GCOP & PPS contemplate also lot creation for ag-related uses. This isn't reflected in the creation of new lots policies in Ag/Spec Ag in TBM OP.</p>
22	B4.2.4.3 and B4.3.5	Other types of consent	Please note that 4.3.3.3 (2) of the PPS specifies that lot adjustment in prime ag may be permitted for legal or technical reasons only. Revision is recommended.
23	B4.4.4.1	Non-farm land uses (Rural designation)	<p>For small lots, please note Nitrate provisions updated in GCOP:</p> <p>Section 8.9.1 GCOP 'servicing' clause 18 notes that: <i>"New lot creation less than 0.4 hectares in size on individual private services, or on partial services using private individual septic systems, shall only be considered with the successful completion of a nitrate study demonstrating that the lot can be serviced in accordance with the Ministry of the Environment, Conservation and Parks (MECP) D-5 Series Guidelines, or any successor thereto. Municipalities may choose to require a nitrate study for additional residential units on lots less than 0.4 hectares in size."</i></p> <p>Note also, ribbon dev policies have been removed from GCOP (re: TBM clause 'f') – this section could be deleted, at the Town's discretion.</p>

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
24	B4.4.4.5	Recreational uses	<p>Recreational uses are permitted on Ag, Special Ag and Rural lands as an OFDU per Table 7 of the GCOP, subject to size/scale limitations applicable to OFDU's under the GCOP and Permitted uses in Prime Ag Areas provincial guidance. The policy tests noted in B4.4.4.5 should be compared against the OFDU policy provisions within the GCOP and updated accordingly.</p> <p>Resource Based Recreational Uses are permitted in the Rural designation potentially at a scale beyond OFDU permissions, subject to Section 5.4.1 (2) of the GCOP (as is expected to be further refined via OPA 23).</p>
25	B4.4.4.6	Resource Based Recreational Uses and recreational/tourist based rural clusters	<p>Note: Pending County OPA#23 may amend these policies as proposed, s/t County Council approval. In that case, a future conformity update would be indicated to the TBM OP to bring the local policies into conformity.</p> <p>Given the overlapping timelines of these two processes (OPA 23; TBM OP Update), staff offer that the local OP could be revised so as to direct/refer readers to the County OP for applicable policy tests.</p> <p>Alternately, with the Town's consent, should OPA23 be approved following adoption of the Town's plan but prior to County approval, this section could potentially be brought into conformity 'by modification'.</p>
26	B4.4.4.7	Residential Farm Cooperatives and Agri-miniums	As above, re: OPA23

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
27	B4.5.3	Permitted uses, Hamlet (Heathcote, Ravenna)	Clause (b) notes ARUs s/t Section B2.7 –may want to consider a ‘countryside’ ARU policy section for consideration of rural ARU’s (i.e. not fully serviced) vs. referring all to B2.7. This could potentially be included within a revised ‘Accessory Residential Uses’ section B4.1.1, as noted above.
28	B4.7.4.6	Areas of Potential Mineral Aggregate Extraction	<p>Staff note that such areas are now referred to in the County OP as ‘Aggregate Resource Areas’. This appears to be properly noted on the Legend to Appendix 1 to the TBM OP however is not reflected through the text of the plan.</p> <p>Staff suggest revision to this section as follows:</p> <p>Delete all text from “Uses permitted by this Plan on lands so designated...” through the end of clause (d).</p> <p>Insert policy wording reflective of Section 5.2.2 (7) of the GCOP.</p> <p><i>This could read, as follows:</i></p> <p><i>(7) In Aggregate Resource Areas shown on Appendix 1, new non-agricultural uses may be considered on existing lots of record, where they are a permitted use in the Agricultural, Special Agricultural, or Rural land use types. Where such non-agricultural uses are not permitted by those land use types, and an official plan amendment is required, new non-agricultural uses may only be permitted if:</i></p> <p><i>a) The extraction of the aggregate resource is not feasible due to the quality or quantity of material or the</i></p>

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
			<p><i>existence of incompatible development patterns. The quality and quantity of the material will be determined by having a qualified individual dig test pits within the area proposed for the non-agricultural development as well as the lands within 300 metres of the aggregate operation; or that</i></p> <p><i>b) The proposed land use or development serves a greater long term interest of the general public than does aggregate extraction; and</i></p> <p><i>c) Issues of public health, public safety, and environmental impact are addressed.</i></p> <p><i>Notwithstanding the foregoing, a proposed land use that conforms with the Official Plan and Zoning By-law, but requires Site Plan approval pursuant to Section 41 of the Planning Act, shall not be required to address the above criteria.</i></p>
29	B4.7.4.8	Rehabilitation	<p>Staff suggest additional wording be provided at the end of the second paragraph within this section, to the effect of the following:</p> <p><i>The Grey County Official Plan provides additional guidance regarding site rehabilitation, outlining also those circumstances under which complete rehabilitation for agricultural purposes may not be feasible and identifying considerations that would apply to rehabilitation in those situations.</i></p>
30	NEW (B4.7.4.9) to	Bedrock and/or Shale Resources Area	Staff suggest a new Section be inserted as B4.7.4.9 called Bedrock and/or Shale Resources Area. Staff

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
	follow after B4.7.4.8		<p>suggest policy text be included, to the effect of the following:</p> <p><i>The Province has provided mapping for Bedrock and Shale Resource Areas, within 8 metres of the surface, which have been shown on Appendix E of the Grey County Official Plan. This mapping identifies areas subject to a potential development constraint to non-farm sized lot creation and establishment of certain non-Agricultural uses on subject properties within the Town of the Blue Mountains. The related policies of Grey County Official Plan shall apply.</i></p>
31	B5.2	Natural Heritage Features	<p>Staff note that the GCOP plan also addresses the mapped Natural Heritage System (NHS) which includes Core Areas and Linkages, as well as specifying 120m Adjacent lands to the Core Areas.</p> <p>It is recommended that reference to the County NHS, Core, Adjacent Land and Linkages be included at the end of Section B5.2 of the TBM OP, perhaps as follows:</p> <p><i>Additional policies relating to components of the Natural Heritage System within Core Areas, Linkages and their adjacent lands are included within Section 7 of the Grey County Official Plan. The Natural Heritage System Core Areas and Linkages are shown on Schedule C to the County Official Plan and the related policies of that plan shall apply. Generally, development proposed within core areas, their 120m adjacent lands, or Linkages will be required to undertake an Environmental Impact</i></p>

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
			<p><i>Study (EIS) unless exempted by the policies of the Grey County Official Plan.</i></p> <p>In future, at such time of more fulsome revision of the Town's Natural Heritage policies, County Staff suggest that more fulsome integration of the NHS mapping and policies into the local OP may be beneficial, for example, the inclusion of Core/Linkage mapping within Appendix 1 'Constraints' for reference.</p>
32	B5.5.7	Valleylands	<p>Staff suggest update to this policy section, as Significant Valleylands have been identified via the County's Natural Heritage System Study, now embedded into the GCOP. Revised policy could be included here, perhaps as follows:</p> <p><i>"Significant Valleylands were identified through the County of Grey's Natural Heritage System Study. Detailed delineations of Significant Valleylands are illustrated within Schedule C of the GCOP and should be evaluated on a site-specific basis thru an Environmental Impact Study (EIS) using the criteria included within Section 7 of the Grey County Official Plan.</i></p> <p><i>No development or site alteration may occur within Significant Valleylands of their 120m adjacent lands unless it has been demonstrated through an EIS that there will be no negative impacts on the natural features or their ecological functions.</i></p>

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
			<p><i>Significant Valleylands will not be required to be mapped in municipal zoning bylaws, as these features are generally already covered by Hazard Land and Regulation mapping across the County.</i></p> <p>In future, at such time of more fulsome revision of the Town's Natural Heritage policies, County Staff suggest that more fulsome integration of the NHS mapping and policies into the local OP may be beneficial, for example, the inclusion of Valleylands mapping within Appendix 1 'Constraints' for reference.</p>
33	B5.5.3	Karst Topography	Staff suggest fulsome update to this policy section, as the related section at 7.5 of the GCOP has been updated, identifying more fulsome consideration of landscape features indicative of karst, and altering the detail of site investigations to be undertaken in areas of known karst.
34	C2.1	Function of Watercourses	In the paragraph, below the itemized list, Staff ask that Grey County be identified, alongside the Conservation Authority.
35	C4.2	C4.2 Ground and Surface Water Resources	Staff suggest that this section be revised to reflect that a Source Protection Plan is now in effect. A reference to direct the reader to that plan/additional info should be added.
36	C4.3 (b)	Ref: Environmental Site Screening Questionnaire	Staff are not familiar with the site screening questionnaire approach. Is this still in use (when, by whom?). Additional information is appreciated.
37	C9/9.2	C9/9.2 EIS Requirements	Staff suggest that this section should make reference to the relevant policy of the GCOP regarding EIS requirements. Such added policy could also perhaps

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
			make reference to the technical guidance that is additional offered by the County from time to time- we have an updated EIS guide now available online, here: Planning Application Form Guidelines Grey County
38	D1.2	Preferred Means of Servicing in Settlement Areas	<p>Staff would highlight revised wording in PPS 2024, Section 3.6(5) as relates to the use of partial servicing in (b)settlement areas and (c) rural settlement areas.</p> <p>Staff suggest review of the added text regarding partial services, with consideration to the servicing types available in the settlement areas/rural settlement areas to which these policies would apply locally. The updated PPS wording appears to limit use of partial services within rural settlement areas to situations of failed servicing, or via individual on-site water services with municipal sewage services (and not municipal water, with individual on-site sewage services).</p>
39	D3.3	Built Heritage and Cultural Landscape Resources	A fulsome review of this section prior to adoption is suggested given recent changes to the <i>Ontario Heritage Act</i> via the <i>More Homes, More Choice Act, 2019</i> (Bill 108) and issuance of Ontario Regulation 385/12.
40	D3.4	D3.4 Archaeological Resources & Indigenous Consultation	Staff suggest that references within this section could perhaps be expanded to speak also to consultation with descendant communities in relation to important cultural heritage sites/resources and through the archaeological assessment process, where applicable. Grey Roots has recently published a Black History Map of Grey County, available online here: Black History Map of Grey County Grey Roots

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
			<p>Staff note that an Archaeological Management Plan is in preparation by the County of Grey, beginning with the creation of a GIS-based Archaeological Potential Model. Later stages of this work will include the preparation of updated policy and procedures in relation to archaeological sites and resources, as may inform future conformity updates to this Plan.</p>
41	E1.2	E1.2 CPPS By-law	<p>County Staff appreciate the research and efforts by local staff to bring in this new type of framework for targeted use. Further detailed review of the CPPS policy section will be completed post adoption.</p> <p>A conversation between County and local Staff is appreciated in this regard, to confirm the anticipated ancillary processes that will also need to be completed to support implementation of this framework (for example, CPPS by-law; Community Benefits Strategy & by-law, etc.)</p>
42	E1.4	Temp Use by-laws	<p>Staff note that references here to 'Garden Suite' have also been removed. Despite added provisions relating to ARU's, there may still be times where a temporary/removable unit is desirable.</p> <p>Should this be reincorporated, please note that a garden suite would be counted towards total permitted ARU's on a lot, where one exists. Section 4.2.6 of the GCOP applies.</p>
43	E3.5.2-4	Community Improvement Goals, Objectives, Selection of Project Areas	<p>County staff would highlight that Section 28 (1.1) of the Ontario Planning Act specifies that 'community improvement' includes provision of affordable housing.</p> <p>Staff suggest that consideration be given to making</p>

Item #	Section or Schedule	Policy/Matter Considered	Change suggestions; refs
			<p>specific reference within this section to the use of a CIP to support affordable housing creation. Such CIP programs may still be considered under the more generally-stated goals and objectives (i.e. improve social conditions, facilitate community economic development, improve community quality, safety and stability) however addition of this application of the CIP may offer greater clarity, or express greater commitment to this intent.</p>
44	E10	Complete Application Requirements	<p>Staff note that Clause (a) speaks to the types of applications that complete application requirements apply to. We suggest minor revision, to include the specific Act section references that empower these requirements.</p>



Land Use Planning, Development Approvals & Project Management Services
www.planwells.com

November 7th, 2024

Ms. Corrina Giles, Clerk
Town of The Blue Mountains
32 Mill Street
Thornbury, ON
N0H 2P0

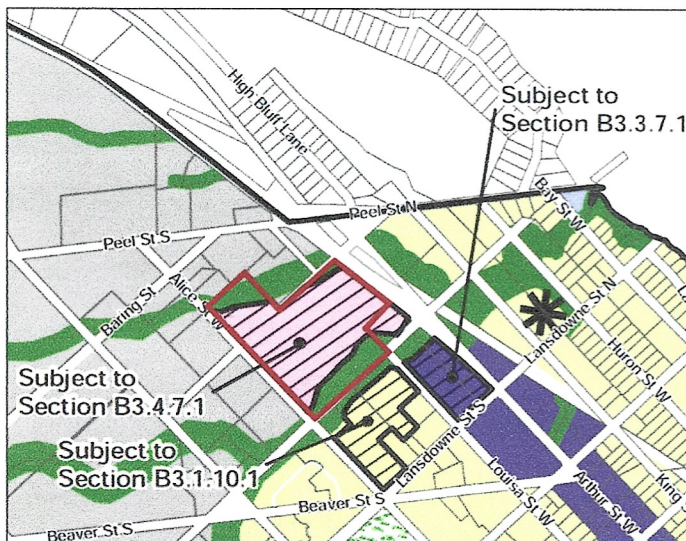
Dear Ms. Giles,

**Re: Proposed Town of the Blue Mountain New Official Plan
Town Plot Lot 13 to 15 Alice, E/S Lot 13 & 14 Louisa W/S, Pt. Lots 46 to 49 Louisa E/S
ARN# 424200001700300
Town of The Blue Mountains, County of Grey**

Plan Wells Associates act on behalf of the owner of the above-noted lands.

The 'draft' September 2024 version of the new Town of the Blue Mountains Official Plan designates the above noted lands 'Commercial Corridor' with site-specific Special Policy B3.4.7.1. Although the text of the proposed Official Plan contains policies for the Commercial Corridor designation under Section B3.4, it does not include site-specific Special Policy B3.4.7.1.

We would request that the text of Special Policy B3.4.7.1 be included under Section B3.4.




Also, please note that the new Official Plan does not list Section B3.4 – Commercial Corridor in the Table of Contents.

Attached, please find copies of two letters previously submitted to the Town on October 31st, 2021 and August 5th, 2022, requesting that the ongoing Official Plan Update consider adding a retirement home/long-term care facility, with an affordable accessory rental residential component for staff housing, as site-specific additional Institutional uses on the subject lands.

Kindly ensure that we are notified of any future meetings, reports and/or decisions made by Council concerning the proposed Official Plan.

Yours truly,
PLAN WELLS ASSOCIATES



Miriam Vasni, *MCIP, RPP*

c.c.: Scott Taylor, Director of Planning, County of Grey
Adam Smith, Director of Planning & Development Services, Town of The Blue Mountains
Shawn Postma, Senior Policy Planner, Town of The Blue Mountains
Daniel Pasta
Shelley Wells, Plan Wells Associates

Encl.



Land Use Planning, Development Approvals & Project Management Services

August 5th, 2022

Mayor Soever & Members of Council
Town of The Blue Mountains
32 Mill Street
Thornbury, ON
N0H 2P0

Dear Mayor Soever & Members of Council,

***Re: Town Plot Lot 13 to 15 Alice, E/S Lot 13 & 14 Louisa W/S, Pt. Lots 46 to 49 Louisa E/S
ARN# 424200001700300
Town of The Blue Mountains, County of Grey***

Plan Wells Associates act on behalf of the owner of the above noted lands.

On October 31st, 2021, we submitted a letter to the Town requesting that the ongoing Official Plan Update consider adding a retirement home/long-term care facility, with an affordable accessory rental residential component for staff housing, as site specific additional Institutional uses on the subject lands (see attached). The letter was individually circulated to all members of Council, the Clerk, as well as Town Planning Staff. There has been no acknowledgement of receipt or any response to our letter from anyone that was circulated.

We have reviewed the Town's draft Official Plan dated July 19, 2022, as it pertains to the subject lands and offer the following comments.

The existing Commercial Corridor designation and permitted uses thereto have been brought forward into the draft Official Plan. No changes to the permitted uses were made.

The Commercial Corridor designation permits Institutional uses. The Official Plan defines Institutional uses - *"Means a use that caters to the social, educational and/or religious needs of humans."*

In our opinion, a retirement home/long term care facility and associated affordable rental housing for staff qualifies as social needs of humans. Therefore, we again request that a retirement home/long term care facility and associated affordable rental housing for staff be added as site specific additional Institutional uses under the Commercial Corridor designation.

The County of Grey has put forth a 'Housekeeping' amendment to their Official Plan (OPA #11). This amendment includes additional innovative residential uses such as tiny homes and co-housing. These progressive and timely types of residential units/uses can contribute to affordability, employee housing, retirement/seniors' accommodation.

While we fully support the existing permitted uses under the Commercial Corridor designation, it is our opinion that additional mixed-uses such as additional residential uses above ground floor commercial retail and business office uses, tiny homes, co-housing can address the unmet needs for specific resident groups, including seniors, and will contribute to a complete community.

The above noted forward thinking units/uses are not mentioned in the Town's draft Official Plan. The proposed policies of OPA #11 should be given consideration in this proposed document.

The 2016 Official Plan identifies deer wintering areas associated with valleylands on and adjacent to the subject lands. A deer winter habitat survey was completed for the Blue Meadows development on the east side of Little Beaver Creek in late winter (March), when sign of winter deer use would be most apparent. The survey included assessment of evidence of winter deer use on the subject lands and adjacent lands – tracks, trails, pellet group accumulations, browsing of shrubs/trees, etc. The results of the survey revealed no sign of winter deer use on the subject lands or adjacent valleylands.

We have reviewed the Town's draft Official Plan dated July 19, 2022, as it pertains to the subject lands; in particular, Appendix 1 – Constraint Mapping and offer the following comments.

The delineation of the deer wintering area on the subject lands has been brought forward from the 2016 Official Plan into the draft 2022 Official Plan and does not reflect the ground truthing performed by Azimuth during their deer winter habitat survey.

Based on the findings of the Azimuth study, we would request that Appendix 1 – Constraint Mapping to the draft 2022 Official Plan be modified to remove the deer wintering area constraint on the subject lands and adjacent valleylands, as these lands were also assessed in the Azimuth deer winter habitat survey.

We trust that you will give due consideration to these comments, as you consider the draft Official Plan, and we request that you ask staff to specifically respond to the comments identified herein.

Please note that the above noted comments are preliminary, bearing in mind the short timeline to review this draft Official Plan.

Kindly ensure that we are notified of any future meetings, reports and/or decisions made by Council concerning the proposed Official Plan.

Please do not hesitate to contact us if you have any questions or if you would like to discuss this matter further.

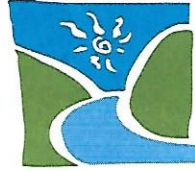
Yours truly,
PLAN WELLS ASSOCIATES



Miriam Vasni, MCIP, RPP

c.c.: Corrina Giles, Clerk, Town of The Blue Mountains
Adam Smith, Director of Planning & Development Services, Town of The Blue Mountains
Shawn Postma, Senior Policy Planner, Town of The Blue Mountains
Natalya Garrod, Planner, Town of The Blue Mountains
Scott Taylor, Director of Planning, County of Grey
Daniel Pasta
Shelley Wells, Plan Wells Associates

End.



Land Use Planning, Development Approvals & Project Management Services

October 4th, 2021

Mr. Shawn Postma, *MCIP, RPP*
Senior Policy Planner – Planning Services
Town of the Blue Mountains
32 Mill Street, P.O. Box 310
Thornbury, Ontario
NOH 2P0

Dear Mr. Postma,

***Re: Town of the Blue Mountains Official Plan Update
Request for Site Specific Additional Permitted Uses-Commercial Corridor Designation
Town Plot Lot 13 to 15 Alice, E/S Lot 13 & 14 Louisa W/S, Pt. Lots 46 to 49 Louisa E/S
ARN# 424200001700300***

Purpose

Plan Wells Associates is the planning consultant for the above noted lands. Under the current Town of the Blue Mountains Official Plan, the subject property is designated Commercial Corridor. Institutional uses are permitted under this designation.

The purpose of this letter is to request that the ongoing Official Plan Update consider adding a retirement home/long-term care facility, with an affordable accessory rental residential component for staff housing, as site specific additional Institutional uses on the subject lands. Interest has been shown for these lands by several retirement home/long term care providers and our request responds to this confirmed need and interest.

Subject Lands

The approximate 6.5 ha (16 ac) property is located just east of the western gateway into the Town of Thornbury and is bounded by Arthur Street (Highway 26) to the north and Alice Street West to the south. Alice Street West is a local public road, maintained year-round. The property is within walking distance to the Thornbury Foodland and LCBO and is in close proximity to the downtown core and waterfront.

Provincial Policy Statement 202 (PPS)

The PPS states that Settlement Areas shall be the focus of growth and development.

Healthy, liveable, and safe communities are sustained by promoting efficient development and land use patterns which sustain the financial well-being of municipalities over the long-term. In part, this can be achieved by:

- Accommodating an appropriate affordable and market-based range and mix of residential types, affordable housing for older persons, employment (including long-term care homes), recreation, park and open space, and other uses to meet the long-term needs.
- Improving accessibility for persons with disabilities and older persons by addressing land use barriers which restrict their full participation in society.
- Ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs.

Planning authorities shall provide for an appropriate range and mix of housing options by permitting and facilitating all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities.

Comment

- The subject lands are within a Primary Settlement Area.
- The additional uses will permit the development of a retirement home/long term facility for seniors arising from on-going demographic changes
- The proposed additional uses will create employment opportunities and provide affordable rental opportunities for facility staff
- The development will be on full municipal services
- Community service facilities and recreation amenities are readily available and accessible
- The request for the proposed additional uses is consistent with the PPS

County of Grey Official Plan

The County of Grey Official Plan designates the subject property Primary Settlement Area and Hazard Lands.



The County Plan promotes the development of Primary Settlement Areas for a full range of residential, commercial, industrial, recreational, and institutional uses. These areas are to be the focus of growth.

Section 2.4(2) – Updating the Local Official Plan to the County Plan, local municipalities will:

- Develop policies and/or guidelines to ensure that new development does not conflict with the surrounding development
- Ensure a variety of housing and development opportunities within Settlement Area land use types
- Ensure convenient access to retail facilities, recreational facilities and services via motor vehicle, bicycle, and pedestrian travel
- Ensure development will provide a wide range of housing types, including special needs housing

The County Plan considers Social and Special Needs Housing ‘non-market’ housing and refers to housing that is provided or owned only by public or private non-profit organizations, targeted towards a specific at-risk population. Long-term Care facilities are considered Social & Special Needs housing. The County recognizes the need to direct new social housing units toward Primary Settlement Areas to ensure residents live close to essential services and supports and by promoting ease in carrying out a healthy lifestyle.

The County Plan promotes opportunities for flexible, experimental seniors housing to assist in accommodating an aging population. As populations age, their housing needs change. The County is focused on providing for a variety of options that would account for psychological, physical, and social needs. The County Plan supports safe and accessible community design for all ages, including facilities such as senior citizen homes, nursing homes and rest homes in urban areas where other supportive services exist.

Comment

- The proposed additional permitted uses (retirement/long term care facility and staff residential component) will not conflict with the surrounding development
- The subject lands are close to essential community services and supports
- The proposed additional uses will provide housing for the aging population and their changing needs
- The proposed additional uses will create employment opportunities and provide affordable rental opportunities for facility staff
- The proposed request to permit the additional uses maintains the intent and direction of the County of Grey Official Plan

Town of the Blue Mountains Official Plan

The subject lands are currently designated 'Commercial Corridor' and 'Hazard.'



To the west and south are lands in the future Secondary Plan Area. To the east are lands designated Community Living, some of which have been developed (Meadowbrook Lane, Far Hills) and the future Blue Meadows residential and commercial development.

Proposed Additional Uses within the Commercial Corridor Designation

The subject property has an area of approximately 6.5 ha (16 ac). This area is quite large given the compact size of the Town of Thornbury for the uses permitted under the Commercial Corridor designation (supermarkets, restaurants, department stores, retail uses, automotive commercial, service uses, wholesale establishments, institutional uses, and business offices). Collingwood and Owen Sound are designated primary centres where larger box stores serving a regional market are to be located. The subject property has not been developed over the life of the current Official Plan due to lack of interest by the type of uses permitted, whereas there is a pressing need for suitable sites (size/location) to accommodate a retirement/long term facility with accessory affordable housing for staff.

The Commercial Corridor designation permits Institutional uses. The Official Plan defines Institutional uses - *"Means a use that caters to the social, educational and/or religious needs of humans."*

This definition is somewhat subjective. In our opinion, a retirement home/long term care facility and associated affordable rental housing for staff qualifies as social needs of humans. Therefore, we request that a retirement home/long term care facility and associated affordable rental housing for staff be added as site specific additional Institutional uses under the Commercial Corridor designation.

As noted above, lands to the west and south of the subject property are within the Future Secondary Plan Area. It is likely that these lands will be designated Community Living Area under the Secondary Plan for future residential uses.

The optimal orientation for a retirement home/long term care facility and staff housing would be along Alice Street West, which would provide a transitional buffer between the future Secondary Plan Area uses and the remaining Commercial Corridor lands fronting onto Arthur Street.

Section B3.1.6.1 provides the criteria for the establishment of Long-term Care Facilities and Retirement Homes:

- The site has adequate access to a County or Collector Road
- The site has adequate land area to accommodate the building, an outdoor amenity area, on-site parking and appropriate buffering to ensure compatibility of the use with adjacent land uses
- The use will not cause traffic hazards or an unacceptable level of congestion on surrounding roads
- The use can be serviced by municipal water and sewer

Comment

- The site has adequate land area to accommodate the proposed development
- The proposed use is compatible with adjacent land uses
- The use will not cause traffic hazards or an unacceptable level of congestion on surrounding roads
- The use can be serviced by municipal water and sewer
- The subject property does not directly access a county or collector road. The site has frontage on Highway 26 and Alice Street West, which is a local road. The site is in close proximity to Alfred Street West, which is a county road. Bruce Street South is the only other county road in the Town and is developed on both sides. There is no opportunity to develop a retirement/long term care facility along Bruce Street South. The only collector road in the Town is Clark Street (Grey Road 2), which is identified as a Major Collector Road on Schedule 'B2' to the Official Plan. Clark Street is not an optimum location for a retirement/long term care facility, as it is on the eastern outskirts of the Town.

Community Benefit

The demographics of the Georgian Triangle has matured through the years as permanent residents are aging and more retirees are moving from larger urban centres to the area. The majority of the Town of the Blue Mountains is rural by nature, with interspersed hamlets and villages, with Thornbury being the only 'town.' Thornbury is the primary population centre, offering a full range of community services and recreational amenities.

Currently, Errinrung Long Term Care & Retirement Community is the only facility of its kind in the Town of Thornbury, providing care for approximately sixty individuals. Errinrung is located on Bruce Street South, within the Bruce Street/Marsh Street Corridor of the Town and occupies an approximate .5 ha (1.3 ac) parcel of land. All abutting parcels are developed and at this time there is no possibility for Errinrung to expand.

Statistics provided by the County indicate that in 2019 there were approximately 2,542 seniors over the age of seventy-five within a 15-minute drive from the Town of Thornbury. It is expected that by the year 2029, this number will climb to approximately 3,086.

Adding a retirement home/long-term care facility and an affordable rental residential component for facility staff will fulfill an important need in the Town of the Blue Mountains. It will provide existing and future senior residents the option of staying in the community where they have lived for many years.

The proposed additional permitted uses represent good planning, and we respectfully ask that our request be granted.

Yours truly,
Plan Wells Associates



Miriam Vasni, *MCIP, RPP*

c.c.: Alar Soever, Mayor
Rob Potter, Deputy Mayor
Peter Bordignon, Councillor
Paula Hope, Councillor
Andrea Matrosovs, Councillor
Rob Sampson, Councillor
Jim Uram, Councillor
Corrina Giles, Clerk, Town of the Blue Mountains
Trevor Houghton, Manager of Community Planning, Town of the Blue Mountains
Randy Scherzer, Director of Planning & Development, County of Grey
Daniel Pasta, 2275568 ONTARIO LTD.
Shelley Wells, Plan Wells Associates



Land Use Planning, Development Approvals & Project Management Services
www.planwells.com

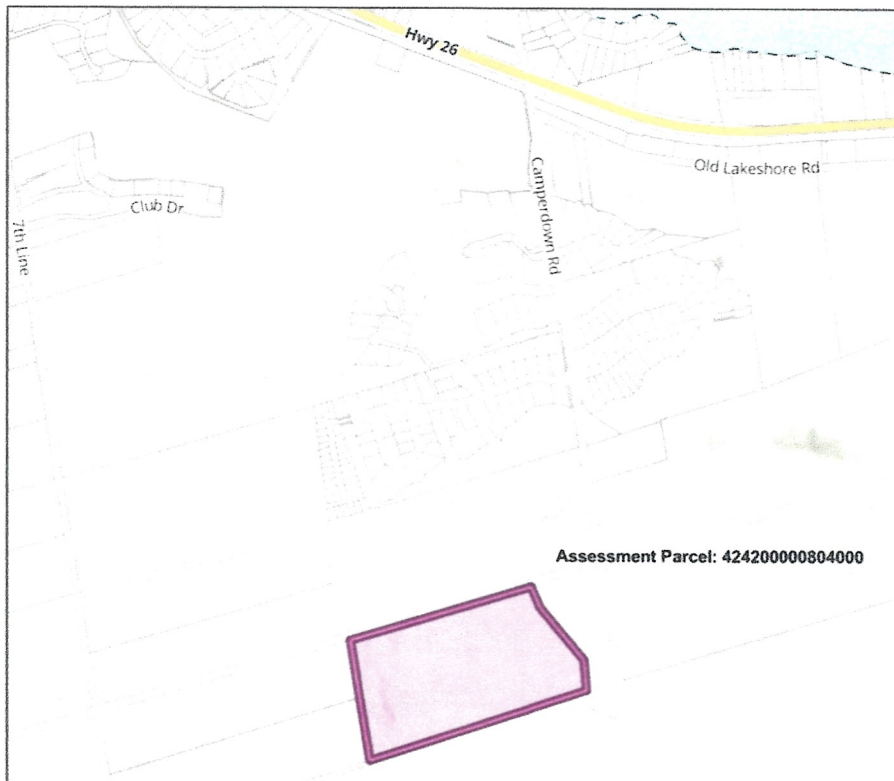
November 12th, 2024

Ms. Corrina Giles, Clerk
Town of The Blue Mountains
32 Mill Street
Thornbury, ON
N0H 2P0

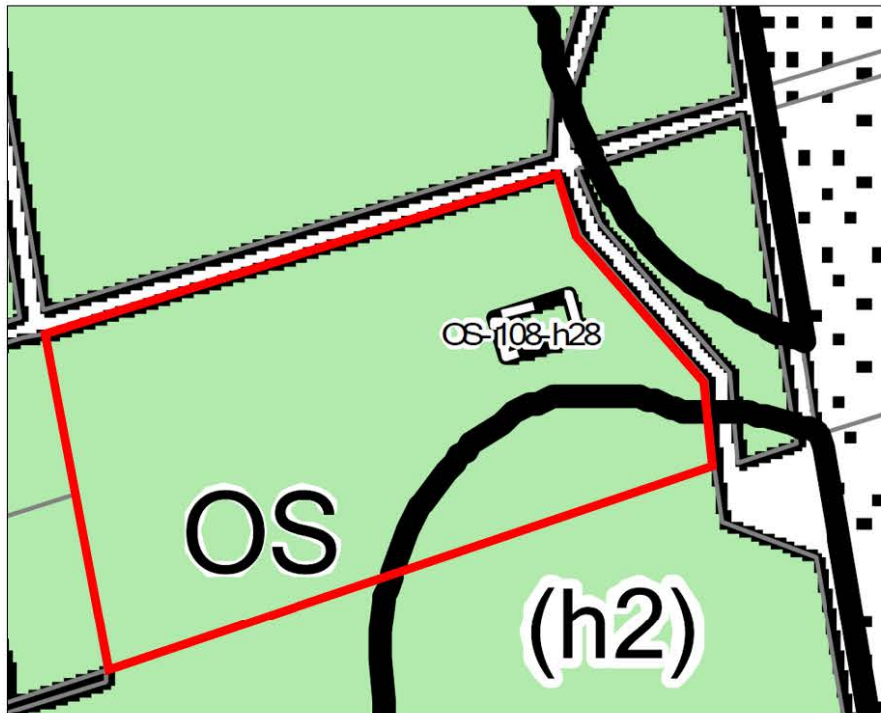
Dear Ms. Giles,

***Re: Proposed Town of the Blue Mountain New Official Plan
Part Lot 24, Concession 7
ARN# 424200000804000
Town of The Blue Mountains, County of Grey***

Plan Wells Associates act on behalf of the owner of the above-noted lands.



The subject property is zoned Open Space-Exception 108 (OS-108).



Exception 108 permits:

“One single detached dwelling and accessory buildings and structures may be permitted on a lot without frontage on an open and maintained road for those lands located and being in the Town of The Blue Mountains, comprised of Part of Lot 24, Concession 7. A single detached dwelling shall have a maximum height of 1.5 storeys and shall only be located within the building envelope identified on the Schedule.”

The subject parcel is designated Escarpment in the ‘draft’ September 2024 new Official Plan.

Section B3.15.3 provides the Permitted Uses on lands designated Escarpment, and states:

“Permitted uses on lands designated Escarpment are limited to those recreational uses that require the slopes to function. In addition, essential transportation and utility facilities may be permitted provided that no reasonable alternative is available outside the Escarpment designation.

Where possible, site selection for permitted uses shall be directed toward other appropriate designations.”

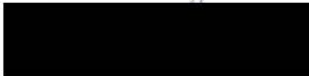
A single detached dwelling and accessory uses are not permitted under the Escarpment

designation. We would therefore request that a new site-specific policy be added to Section B3.15.8 - 'Special Site Policies' to include the permitted uses as described under the site specific zoning on the subject lands OS-108, as noted above.



Kindly ensure that we are notified of any future meetings, reports and/or decisions made by Council concerning the proposed Official Plan.

Yours truly,
PLAN WELLS ASSOCIATES


Miriam Vasni, MCIP, RPP

c.c.: Scott Taylor, Director of Planning, County of Grey
Adam Smith, Director of Planning & Development Services, Town of The Blue Mountains
Shawn Postma, Senior Policy Planner, Town of The Blue Mountains
Peter Doering
Shelley Wells, Plan Wells Associates



Date: August 27, 2022

To: The Town of The Blue Mountains

Attention: Corrina Giles, Clerk (townclerk@thebluemountains.ca)

Please circulate to The Town of The Blue Mountains Official Plan Review Project Advisors:

Senior Policy Planner, Shawn Postma, Councilor Paula Hope, Councilor Jim Uram,
Director of Planning and Development A. Smith, Director of Operations S. Carey.

cc: Mayor Alar Soever, CAO Shawn Everitt.

Re: Town of the Blue Mountains Official Plan Proposed Amendment #3

The Blue Mountains Watershed Trust Foundation's mission is to protect and enhance the Blue Mountains Watershed ecosystems through direct action, advocacy, and education.

In our letter to you in May, the Trust made three (3) requests, and three (3) suggestions, regarding the 5-year review of the Town's Official Plan 2016:

Request #1: Increase the town's focus on Watershed-based Planning.

Suggestion #1: Strengthen and affirm the wording of the Official Plan by making Watershed Planning a PRIORITY in the Town's development approval process.

Request #2: Expediently conclude the studies of the Town's Natural Heritage features, and current surface and municipal wastewater drainage patterns, both sewage and drainage.

Suggestion #2: Make the identification of watershed impacts a PRECONDITION of development approvals so that strategies or solutions can be created at the outset to mitigate any impact these developments will have on nearby properties and watersheds.

Request #3: Make Watershed-based Planning a routine practice in the Town.

Suggestion #3: Recommend that the Town COMMENCE Watershed-based Planning, immediately.

We have reviewed the proposed Amendment #3 to OP 2016 and offer revisions to that work that would more effectively reflect our wishes, as expressed to you in May. For your convenience we have highlighted these revisions in colour; we are recommending that

~~text in red be deleted~~, and text in green be added for the 2 sections of the Amendment that address Watershed policy, and practices, directly:

**Attachment A: Revisions to the text in Amendment #3, "PART A" (Vision etc.),
Pg. 3-14 of this letter**

**Attachment B: Revisions to the text in Amendment #3 "C8.2 THE INTENT OF WATERSHED
PLANS AND SUBWATERSHED PLANS" Pg. 15-16 of this letter**

We ask the Official Plan Review Project Advisors to consider these revisions in the interests of preserving our Natural Heritage Features, our highly functional natural watersheds, and the diverse ecosystems they support. The Trust looks forward to the Town's full implementation of the Provincial policies and practices of "watershed-based planning" as described in the Provincial Policy Statement and:

Watershed Planning in Ontario

<http://www.downloads.ene.gov.on.ca> › documents

Thank you to the Official Plan Review Committee for the considerable progress already made. The Trust looks forward to seeing a well-considered, thoughtful, final document in the not-too-distant future.

Sincerely,

Carl Michener, President
Blue Mountain Watershed Trust Foundation
P.O. Box 605
Collingwood ON L9Y 4E8
Registered Charity No. 89079-8259 RR0001

Direct +1 705 445 0357

Watershedtrust.ca

cc: Warden Selwyn 'Buck' Hicks, County of Grey
Kim Wingrove CAO County of Grey
Penny Colton, Executive Assistant to the CAO and Warden penny.colton@grey.ca

Attachment A: Revisions to the text in "PART A", Amendment #3

PART A

COMMUNITY VISION, STRATEGIC OBJECTIVES AND LAND USE CONCEPT

INTRODUCTION

An Official Plan is a general land use guide which sets out the Municipality's long-term vision for growth and *development* and is intended to provide *Council* with the basis for making decisions on *development* applications, changes in land use and community improvements. The *Planning Act* requires that an Official Plan be reviewed at least once every five years and that the Official Plan of a lower-tier municipality, such as the Town of The Blue Mountains, conform to the Official Plan of an upper-tier municipality, such as the *County* of Grey. In addition, both upper-tier and lower-tier Official Plans must be consistent with all relevant Provincial Legislation and Plans including the Planning Act, the Provincial Policy Statement, the Ontario Heritage Act, Clean Water Act, and the Niagara Escarpment Plan.

The Town of The Blue Mountains was formed by the amalgamation of the Township of Collingwood and the Town of Thornbury on January 1, 1998. The current The Blue Mountains Official Plan was last updated in June 2016. Originally adopted by Town *Council* in 2002, approved by the *County* in December 2004, and approved by the Ontario Municipal Board on September 29, 2006. The purpose of this Official Plan is to set out the vision and provide direction and policy framework **for managing sustainable growth and land use decisions in the Town over the planning period to 2046.**

The County of Grey and the Town of The Blue Mountains completed Growth Management Strategies in 2021 and 2022. Based on the Town and County growth management work and the 2021 Census Canada data, actual and anticipated population growth in the County and Town are summarized in the following chart:

Between 2006 and 2021, the Blue Mountains grew by 2,330 residents:

Between the years 2021 and 2046, it is anticipated that the permanent population in the Town of The Blue Mountains will increase by approximately 6,750 residents (3,590 households). The number of seasonal households is estimated to decline by 80 units between 2021 and 2046. The Town is also expected to add 1,610 new jobs over the forecast horizon. It is estimated that 80 to 85 percent of these 1,370 units will be provided in urban areas (i.e., the Thornbury/Clarksburg Settlement Area).

	2016	2021	2031	2046
Grey County	93,830	100,905	113,440	127,130
The Blue Mountains	7,025	9,390	12,090	16,140
Population Change	Community Area			
2,160	Lora Bay, Camperdown, Craigleith, Blue Mountain Village, Swiss Meadows			
180	Thornbury and Clarksburg			
60	Castle Glen and Osler			
-50	Rural			

The County Official Plan requires an overall average development density of 20 units per net hectare in the Primary Settlement Area of Thornbury-Clarksburg. To encourage more compact growth to Thornbury-Clarksburg a minimum density target of 25 units per net hectare is required by this Plan. In order to achieve this target, the Town will monitor and report on density and household changes throughout the municipality, on an annual basis.

The County Official Plan also establishes a minimum target of 10 percent for *residential intensification* in the Thornbury/Clarksburg settlement area. Assuming 3,590 new permanent dwelling units are to be accommodated in the Town of The Blue Mountains to 2046, 359 new dwelling units must be accommodated as *intensification* in the Thornbury/Clarksburg Settlement Area to 2046. For the Town, this means an average of 14 to 15 units per year should be provided through *intensification*.

The overall intent of this Official Plan has at its core the desire to *enhance* the quality of life for Town of The Blue Mountains residents and business owners, support the tourism and recreation sector in the Town, the recognition of its economic importance locally and regionally, and to establish and maintain a very desirable community that is supported by a clear, concise land use planning framework.

A1 THE COMMUNITY VISION AND GUIDING PRINCIPLES

The primary purpose of the Official Plan is to provide the basis for guiding growth, protecting the environment, and enhancing the Town's unique *character*, diversity, civic identity, recreational and tourism resources, rural lifestyle, and heritage features. The Blue Mountains communities will be connected, efficient, improve affordability and to do so in a way that has the greatest positive impact on the quality of life in The Blue Mountains. The Official Plan is the primary planning document that will direct the actions of the Town and shape growth and *development* and on this basis, this plan establishes a vision for the future land use structure of the Town. This Plan is intended to create a land use planning policy and regulatory framework that is unified in its vision and detailed enough to ensure that the vision is implemented.

The Town of The Blue Mountains embraces a wide diversity of urban, rural, recreational and tourism amenities. The area is generously endowed with natural features and scenic attributes, which have created substantial opportunity for recreational, residential and resort *development*. Based on the prominence of the natural features of the

Niagara Escarpment, Nipissing Ridge and Nottawasaga Bay, the Town serves as a four seasons recreational and tourism destination, with year-round appeal for skiing, hiking, cycling, golf, and other recreational activities. The Province has recognized the Town as a four seasons recreational area and together with the Federal Government has provided funding support of local resort infrastructure, including water and sewage services, roads, walkways, and other facilities.

The Town is located within a 1.5-to-2-hour drive of the Greater Toronto Area, one of North America's fastest growing urban regions. The impact of this growth on demand for access to recreational pursuits will be compounded by the demographic bulge of the baby boomer generation, their wealth, and the contemporary propensity to invest in recreational properties.

The Blue Mountains Sustainable Path was endorsed by *Council* in 2010. The Vision set out for the Town, to the year 2060, in The Sustainable Path states that “*we are a connected and caring Community that blends our heritage with a thriving diverse economy based on the continual preservation and protection of nature. Generations of families live, work, and play in our safe, happy, and inclusive Town. We are a Community ‘Built to Last’*”. The Blue Mountains is a community that:

- supports the protection of our natural and rural resources.
- supports sustainability principles.
- values it’s heritage; and,
- supports the protection of community *character*.

There are two planning principles that essentially provide the basis for effective land use planning. One of these principles requires that planning authorities establish a range and mix of uses in appropriate locations to support the establishment of a complete community, where most of the daily needs of the residents and employees within the community can be met.

The second principle involves planning for healthy communities where residents and employees are encouraged to lead more healthy lifestyles as a result of the provision of a range and mix of uses, recreational amenities and open space areas. In addition, the establishment of *development* standards and protocols that promote the efficient use of energy and *infrastructure* also contributes to the healthy community principle even though the contribution is small in the global context.

A1.1 On the basis of the above, The Blue Mountains is a community that should continue to:

- **preserve, protect, enhance, and augment our Natural Heritage features, such as the Town's two, UNESCO World Biosphere Reserves (Georgian Bay and The Niagara Escarpment), and the many Cold-Water streams, waterways, and Provincially Significant Wetlands between them, that encourage natural biodiversity and ecological resilience, on the land.**
- provide opportunities for the agricultural industry and the rural community to prosper well into future.
- provide opportunities for economic diversification and support small business.
- balance the protection and support for tourism with our living areas, rural communities, and the natural environment.
- provide an appropriate mix of commercial and employment opportunities.
- provide ‘housing for all’ which includes providing housing options for residents at each stage of their life and local housing for those in the service industry; and,
- enable residents to walk or cycle to work or shop.

GUIDING PRINCIPLES

To implement the vision of the Town, Guiding Principles have been developed that are forward thinking and speak to the type of healthy and complete community the Town of The Blue Mountains is and wishes to be. These principles were relied upon in preparing this Official Plan. It is important to note that these Guiding Principles are all encompassing and not listed in any order of importance and therefore, are intended to be read together.

1. To recognize that the Town is made up of a number of desirable, safe, and vibrant neighbourhoods that all combine to make this four-season recreational resort community a desirable place to live, establish roots, learn, visit, and create diverse economic opportunities.
2. To ensure that the land use planning decisions made in the Town provide the basis for managing growth that will support and emphasize the Town's unique *character*, diversity, civic identity, recreational based/rural lifestyle, tourism destinations, natural heritage, and cultural heritage and to do so in a way that has the greatest positive impact on the health of our community and the quality of life enjoyed by residents and business owners alike.
3. To invest in, program and optimally maintain a diverse and interconnected system of public spaces that feature convenient, and comfortable access, encourage safe and healthy environments, are culturally appropriate and attract and serve all components of the population.
4. To provide the opportunity to create compact and efficient neighbourhoods with a range of housing types, price points and mix of services that provide the necessary amenities and transportation options and equitable access to the ingredients of what makes for economically and socially viable neighbourhoods.
5. To recognize that every community in the Town incorporates its own unique character that must be respected and enhanced. To ensure that the *character* of existing and well-established residential neighbourhoods is maintained and *enhanced* by ensuring that *development* and *redevelopment* is *compatible*, in terms of built form and street pattern, with the *character* of adjacent buildings and neighbourhoods and the scale and density of existing *development*.
6. To **identify**, protect and enhance *natural heritage features and areas* and their associated *ecological functions*, **by implementing effective watershed-based planning policies and practices so that these community assets** can be enjoyed by current and future generations and serve as a legacy of the community's desire to protect their role and function.
7. To guide climate change mitigation and/or adaptation actions that result in reduction in greenhouse gases, promote energy efficiency, and other measures to increase our community's resilience to the effects of climate change.
8. To encourage the provision of a wide range of linked and publicly accessible recreational lands and amenities to meet the needs of present and future residents and visitors.
9. To ensure that a full and balanced variety of housing options are available to all ages, abilities, incomes, and household sizes and be located near public transportation where possible, jobs, and *essential* goods and services.
10. To support the protection and growth of industry and tourism- recreation sectors, and the transition of existing industry sectors, toward practices, products and services that increase their overall viability by establishing a competitive business environment that is able to easily adapt to changing circumstances and priorities.
11. To encourage the continued revitalization of the Thornbury and Clarksburg Downtowns, which reflects their **cultural heritage** significance and promotes a mix of uses and attractions for community activities that reinforce the function of the two Downtown areas as cultural, administrative, entertainment, retail, and social focal points of the community.
12. To establish an integrated transportation system that safely and efficiently accommodates various modes of transportation including walking, cycling, public transit, automobiles, and trucks. The system promotes a connected and safe active transportation (non-motorized) network between neighbourhoods, downtown areas, **places** to work, schools, parks/open space, other amenities, and adjacent municipalities.

13. To utilize available capacity of existing infrastructure and to ensure that the construction of all *infrastructure*, or expansions to existing *infrastructure*, occurs in a manner that is *compatible* with adjacent land uses and with a minimum of social and environmental impact.
14. To require that local decision-making processes are transparent and evident to the public through the provision of information, participatory tools, education, and an open process.
15. To protect agricultural and rural areas, including specialty crops, and to encourage the establishment of a broad range of *agricultural uses*, agriculture related uses and *on-farm diversified uses* to ensure that the agricultural industry can continue to thrive and innovate.

A2 THE COMMUNITY STRUCTURE

The Official Plan is based on a 25-year planning horizon and has been prepared within the context of the urban and rural patterns of the Town, the *County* and surrounding regions. The Community Structure Plan (CSP) conceptually illustrates the major structural elements of the Town including settlement areas, resort areas and key corridors and connections. The CSP does not identify any land use designations; it is intended to articulate the structure of the community and how the community is intended to evolve over time in accordance with that structure.

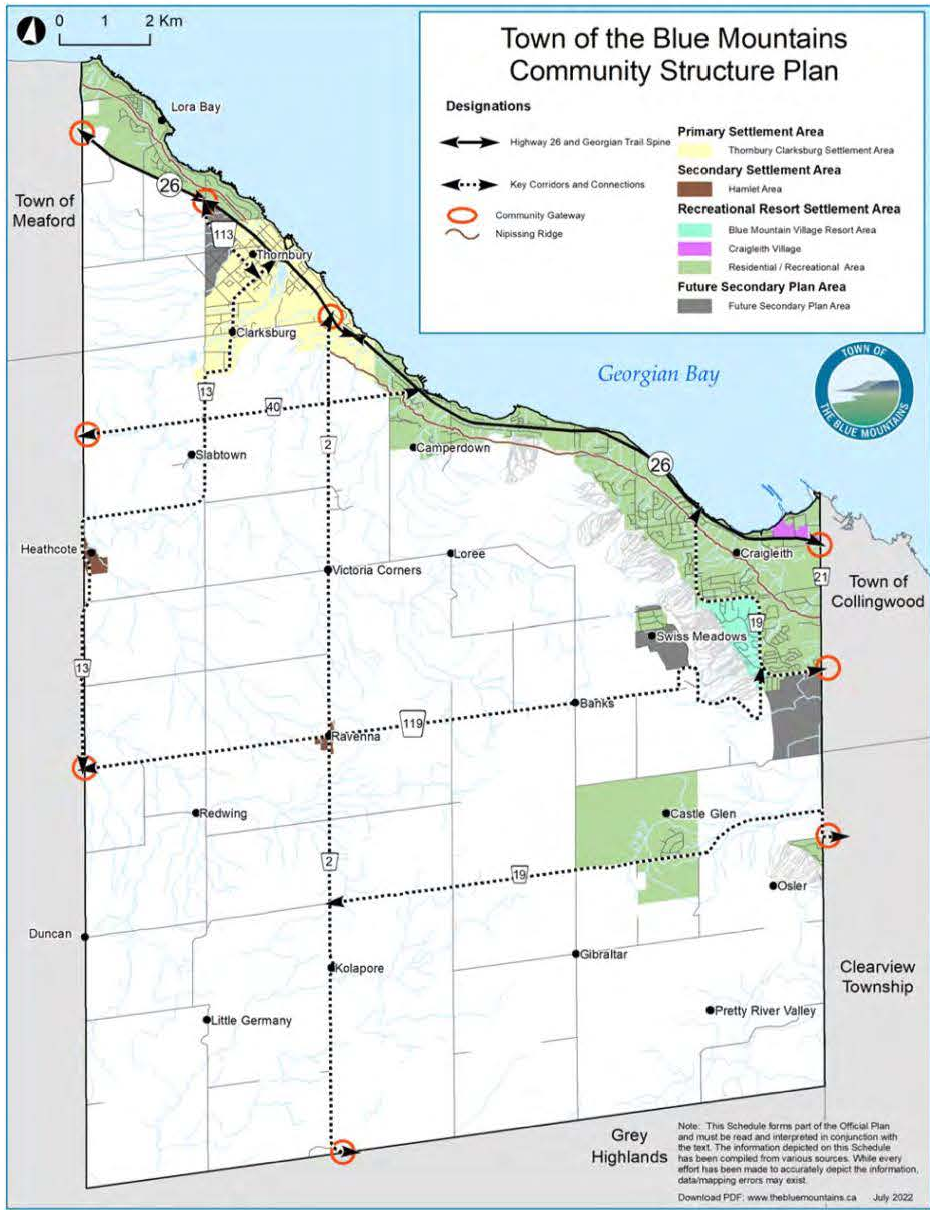
The CSP can also assist in the making of all land use and *infrastructure* decisions that have an impact on where people live, work, and play and on how they travel through the Town. The CSP is also intended to support the type of *development* that makes the best use of *infrastructure*, minimizes the consumption of land *and natural heritage features*, and supports the mixing of uses and activities in appropriate locations.

A2.1 SETTLEMENT AREAS

The Province of Ontario recognizes Settlement Areas as urban areas and rural settlement areas within municipalities (such as cities, towns, villages, and hamlets) that are: built up areas where development is concentrated, and which have a mix of land uses; and lands which have been designated in an Official Plan for development over the long term.

The County of Grey refines the Provincial Settlement Areas further into Primary Settlement Areas, Secondary Settlement Areas, Recreation Resort Area (Settlement Areas) and Escarpment Recreation Area (Settlement Area). The County Official Plan provides further policy direction and growth targets by Settlement Area type.

The Town of the Blue Mountains refines the County of Grey Settlement Areas further again with six Settlement Areas, each having further policy direction and growth targets. Figure 1 – Community Structure Plan illustrates the various settlement area types and their locations.



The Community Structure Plan contains the following main elements:

Primary Settlement Areas:

Thornbury/Clarksburg Settlement Area - the main concentration of urban activities including commercial, residential, cultural and government functions in a well-designed land use form. It is intended that the settlement area will continue to function as a place of symbolic and physical interest for residents and visitors. A range of housing types is supported but all new *development* should respect the *character* of the community and established neighbourhoods while making efficient use of infrastructure and providing for attainable housing.

Recreational Resort Settlement Areas:

Blue Mountain Village Resort Area - the primary resort area that complements the existing recreational base through a range of residential, recreational, and commercial uses, and provides additional opportunities for year-round recreational opportunities and facilities.

Craigleith Village – a settlement area that is similar to but smaller in scale than the Thornbury/Clarksburg Settlement Area, serving the Craigleith and surrounding area through the provision of uses including commercial, residential, and recreational functions.

Residential/Recreational Area – the area designated in the *County* Official Plan extending along the Georgian Bay shoreline and some inland areas providing a resort-related residential and recreational function.

Secondary Settlement Areas:

Hamlet Area – Towns, Villages and larger hamlets which generally have significant populations and wide range of uses but may be limited due to external, physical, policy and/or lack of infrastructure.

Future Secondary Plan Areas – areas that are identified as requiring more detailed planning prior to future *development* occurring:

- Area in west part of Thornbury
- Area east of Thornbury, south of Highway 26
- Area south of the Blue Mountain Village Area
- Area south of Swiss Meadows Subdivision

A3

Highway 26 Spine and Georgian Trail – Highway 26 serves as the Town's main transportation corridor for residents and tourists, linking Thornbury/Clarksburg to other communities along the Georgian Bay shoreline. The Spine also serves as the corridor for the location of community facilities and services. The Georgian Trail is a regionally significant trail link along the Highway 26 corridor.

Key Corridors/Connections – links other communities and areas of the Town to the Highway 26 Spine and nearby communities.

Community Gateways – intended to achieve a sense of entrance/arrival to the Town and neighbourhoods through effective site, building and landscaping design.

Rural Countryside, Natural and Waterfront Areas – consists of agricultural areas, specialty crop areas, natural features/areas/systems and waterfront areas for conservation, *recreation, and* tourism purposes.

GOALS AND STRATEGIC OBJECTIVES

A series of goals and strategic objectives have been developed in an effort to implement the vision and guiding principles of the Town, as set out in Section A1.

Goals are intended to be broad long-term aims that attempt to define how the vision will be implemented. Strategic objectives are intended to be specific and realistic targets that measure the accomplishment of a goal. These goals and strategic objectives are intended to work together in the pursuit of a sustainable balance between the environment, society, culture, and the economy, and to support *development* that meets the needs of the present without compromising the ability of future generations to meet their own needs. These goals and strategic objectives are categorized as follows:

- Sustainable Development
- Natural Environment
- Climate Change Action
- Growth and Settlement
- Urban Community Character
- Rural and Open Space Character
- Agriculture
- Economic Development
- Tourism and Recreation
- Infrastructure
- Housing
- Mineral Aggregate Resources
- Cultural Heritage

A3.1 SUSTAINABLE DEVELOPMENT

The Blue Mountains Sustainable Path was endorsed by *Council* in 2010 and provides a vision for the Town to 2060 as an international showcase for rural sustainability, and states that the Town is committed to finding a sustainable balance between the environment, society, culture, and the economy. Sustainable *development* is defined in the Blue Mountains Sustainable Path as “*development* that meets the needs of the present without compromising the ability of future generations to meet their own needs” (which is the World Commission on the Environment and Development/Brundtland Commission definition – 1987).

It is intended that this Official Plan will implement, where appropriate, the themes, goals, and strategic objectives of the Blue Mountains Sustainable Path. Section D8 of this Plan focuses on policies related to sustainable *development* in the Town. Throughout the remainder of the Plan, policies are provided to assist the Town in meeting its sustainability goals and objectives, through compact *development*, protecting *natural and cultural heritage features*, and promoting active transportation.

A3.1.1 Goal

To promote and encourage sustainable forms of land use and *development*.

A3.1.2 Strategic Objectives

It is a strategic objective of this Plan to:

1. Implement sustainable upper-tier planning and development policies and best-practices as outlined in all legislation, and guidelines that apply.
2. Ensure development is built with the environment, social well-being and climate change as top priorities.
3. Minimize the unavoidable impacts of growth on the Town's *Natural Heritage* features and optimize the Town's ecological footprint health by encouraging new development that is based on the principles and standards of sustainable development and watershed-based planning.
4. Promote the use of leading-edge sustainable development policy and practices and energy conservation policies designed to reduce greenhouse gas emissions.
5. Provide human and social services within the Town's responsibility that help establish a complete community where people of all ages, backgrounds and capabilities can meet their needs throughout the various stages of their lives.
6. Reduce the per-capita consumption of energy, water, land, and other non-renewable resources.
7. Promote practices, which conserve water, and protect or enhance water quality.
8. Promote a compact urban form and develop an energy-efficient mix of land uses, where appropriate, to provide liveable, healthy communities.
9. Encourage reductions in the use of private automobiles by ensuring transit, cycling, walking and other options for low-carbon transportation are diverse, accessible, and balanced, providing options to move throughout urban and rural communities.
10. Encourage efficient neighbourhood, site, and building design and construction techniques that minimize space heating and cooling energy consumption and encourage the upgrading/retrofitting of existing buildings and facilities.
11. Support land use and development patterns that minimize adverse impacts on air quality.
12. Develop design standards that encourage the use of natural and/or naturalized landscapes in new developments to improve air quality throughout the community.
13. Minimize and mitigate land use conflicts between sensitive land uses, and noise, vibration, and emission sources in accordance with all applicable Provincial, County and Town regulations and guidelines.
14. Support the protection of night sky principles and reduce the occurrence of excessive light emissions while still ensuring that adequate levels are maintained for public safety.
15. Preserve and promote local agricultural production.
16. Encourage the use of Green Development Standards that incorporate environmental, social, and economically sustainable designs.

A3.2 NATURAL ENVIRONMENT

A3.2.1 Goal

To protect and enhance significant natural heritage features, areas, and functions in the Town and to work towards the establishment of a Natural Heritage System.

A3.2.2 Strategic Objectives

It is a strategic objective of this Plan to:

1. Protect and seek out opportunities for net-gain enhancements to *significant* natural heritage and hydrologic features and their associated habitats and *ecological functions*.
2. Ensure that an understanding of the natural environment, including the values, opportunities, limits, and constraints that it provides, guides land use decision-making in the Town.
3. Make planning decisions that contribute to the protection, conservation and enhancement of water and related resources on a watershed and sub watershed basis.
4. Maintain and *enhance* all source water resources including surface and *groundwater resources* in sufficient quality and quantity to meet existing and future needs on a sustainable basis.
5. Discourage the loss or fragmentation of *significant* woodlands and the habitats and *ecological functions* they provide.
6. Recognize that an interconnected system of open spaces and natural heritage features contributes to the health and *character* of a community.
7. Prohibit the loss or fragmentation of *Provincially Significant Wetlands* and *significant* habitat of endangered and *threatened species*.
8. Maintain and *enhance significant* areas of natural and scientific interest, *significant* valleylands, escarpment slopes and related landforms, and *significant wildlife habitat* areas.
9. Promote and establish programs to increase the forest cover of the Town.

A3.3 CLIMATE CHANGE ACTION

A3.3.1 GOAL

The crisis caused by the rapidly changing climate affects many aspects of land use. The way land is used and developed will continue to be affected by dramatic fluctuations in temperature and extreme weather events. These changes have significant impacts on our economy, **the** health and wellbeing of our residents, and our environment. The Town of The Blue Mountains needs to increase our communities' climate resilience through energy conservation, innovation and nature-based solutions that result in adaptation and mitigation to the impacts of climate change.

A3.3.2 Strategic Objectives

It is a strategic objective of this Plan to:

1. Recognize the Blue Mountains declaration of climate Change Emergency for the purpose of enhancing and accelerating action on our commitment to protect our community, our economy, and our ecosystems from the impacts of climate change.
2. Be adaptive and resilient to the impacts of climate change and extreme weather.
3. Achieve nature-based solutions in reducing flood risk and preventing shoreline erosion.
4. Encourage active transportation and other transportation modes instead of relying upon single person cars.
5. Encourage higher-density, mixed use developments, infilling, and additional residential units, **where infrastructure is in place, and, green spaces and watershed functions are augmented, accordingly.**

A3.4 GROWTH AND SETTLEMENT

A3.4.1 Goal

To direct ~~most forms of~~ NEW *development* to areas where full municipal *infrastructure is available, including transportation, and water/wastewater management systems and services.* (Note: *water/wastewater management systems include providing potable water as well as sewage and drainage management; transportation systems include highways, trails, and cycle paths.*) ~~are available~~

A3.4.2 Strategic Objectives

It is a strategic objective of this Plan to:

1. Encourage the redevelopment in the Downtown Areas to ~~maximize~~ *optimize* residential intensification opportunities through the inclusion of residential apartments above commercial uses. Direct ~~the majority of~~ new residential and employment growth to areas where full municipal services exist.
2. Direct ~~the majority of~~ new residential and employment growth to areas where full municipal services exist.
3. Reinforce the function of the downtown areas as the primary cultural, business, entertainment, and commercial focal points of the community.
4. Encourage greenfield development *that effectively and* efficiently uses land and infrastructure.
5. Encourage infilling, *intensification*, and *redevelopment* in appropriate locations and with appropriate built form and design.
6. To permit *development* within the Hamlets as focal points in the rural community that maintains and *enhances* hamlet *character* and scale in accordance with the policies contained within this Plan.
7. Ensure that there is an appropriate balance between residential and non-residential assessment in the Town.
8. Ensure that all *development* is appropriately phased and in conjunction with required *infrastructure* improvements where appropriate.

A3.5 URBAN COMMUNITY CHARACTER

A3.5.1 Goal

To protect and *enhance* the *character* of existing urban areas.

A3.5.2 Strategic Objectives

It is a strategic objective of this Plan to:

1. Maintain and *enhance* all communities as diverse, livable, safe, thriving, and attractive communities.
2. Encourage appropriate *intensification* and use of lands within the downtown areas and to make every effort to improve the economic health of these areas by encouraging *redevelopment* and diverse, vibrant, and broad mix of *compatible uses while preserving the town's Natural Heritage assets to the fullest extent possible*.
3. Maintain and *enhance* the *character* and stability of existing and well-established residential neighbourhoods by ensuring that *development* and *redevelopment* is *compatible* with the scale and density of existing *development*.
4. Encourage the *development* of neighbourhoods which are: compact; energy efficient; provide for an integrated network of pedestrian-oriented streets, pathways and cycling facilities; and provide an appropriate mix of housing types, community facilities, commercial and service uses, and *Open Spaces*.
5. Provide community facilities that are connected safe, visible, and accessible to residents in each neighbourhood.
6. Foster a sense of civic identity through a high standard of community design in all future *development* that considers:
 - the appropriate integration of the design of public and private spaces.
 - the design guidelines outlined in the Blue Mountains Community Design Guidelines documented in By-law 2012-47, or any successor thereto.
 - the Community Improvement Plan – Town Wide Revitalization.
 - the Community Improvement Plan – Housing Within Reach.
 - a well-defined public realm, including an interconnected *naturalized, green Open Space* network.
 - sustainable and energy efficient building and site design.
 - the sensitive integration of new *development* with existing *development*.
 - a pedestrian oriented *development* pattern.
7. Work towards *creating* more opportunities for participation in arts and cultural activities.
8. Encourage and support public art and cultural facilities and opportunities for place-making, events, and experiences throughout the Town as a means to foster community and neighbourhood identity and contribute to a vibrant and creative Town.
9. Reinforce the uniqueness of each community building on the distinct heritage characteristics, civic and gathering spaces, pedestrian scale orientation and accessibility that enhance a sense of place

Attachment B: Revisions to the text of section, "C8.2 THE INTENT OF WATERSHED PLANS AND SUBWATERSHED PLANS"

C8.2 THE INTENT OF WATERSHED PLANS AND SUBWATERSHED PLANS

A Watershed is an area of land that drains into a *watercourse* or body of water. Unlike municipal boundaries, watershed boundaries are defined by nature and, as a result, watersheds often overlap a number of jurisdictions. A Subwatershed is an area of land that drains into a tributary of a larger *watercourse* or body of water. The intent of Watershed and Subwatershed Plans is to provide direction and target resources for **the preservation of naturally functioning watersheds** and for the **restoration and/or augmentation of natural Watersheds and Subwatershed areas function affected by development**. Watershed Plans are intended to:

- a) serve as a guide for improving water quality, reducing flood damage, and protecting natural resources in a watershed.
- b) prevent existing watershed problems from worsening as a result of future land *development*, public work activities and agricultural and other activities; and,
- c) provide an opportunity for multiple jurisdictions with varying priorities to coordinate their efforts and accept their responsibility for the impact their actions have both on upstream and downstream areas.

Council shall have regard to the above when making decisions or commenting on the preparation of Watershed and Subwatershed Plans by **professional planners, engineers, and developers**.

C8.3 CONTENT OF WATERSHED PLANS

All Watershed Plans **must reflect the intent of provincial watershed-based planning guidelines and preserve the dynamic, natural, flood-controlling, watershed functions of the Watershed and Subwatersheds. No development is to be approved on lands designated Hazard Lands, Wetlands, and Woodlands by the Province (MNR, MOECF) as reflected in the constraint maps connected to but not forming a part of this Official Plan. Appropriate setbacks from these Lands must also be respected.**

Watershed Plans shall **should** contain the following: *page*

- a) a detailed assessment and analysis of the natural heritage features and their watershed functions and linkages, on a watershed basis, for incorporation into the natural heritage system.
- b) an assessment of the opportunities for **preserving and augmenting Watershed functions** and regard for the constraints to *development described in other parts of the Official Plan*.
- c) an estimate of the *development* capacity of the watershed, based on defined water quality **and quantity** objectives.
- d) a water budget analysis **to assure developers and landowners that the Town's management of water supply, and wastewater management, is keeping pace with projected growth.**

- e) a description of the tools that are available to improve conditions in the Watershed and address the cumulative impacts of development.
- f) An action plan that contains a series of recommended programs and projects for preserving and augmenting ~~improving~~ the natural functionality of Subwatersheds.

It is the intent of the action plan to set out the responsibilities of the various jurisdictions within the Watershed so that each jurisdiction can contribute to the monitoring, preservation, augmentation ~~prevention~~, and remediation of the Watershed to prevent flooding.

All Subwatershed Plans shall contain the following:

- a) a detailed ~~assessment and integrated~~ analysis of the Town's Natural Heritage features that identifies the functional linkages between them, on a Subwatershed basis. ~~for incorporation into the Natural Heritage System~~
- b) a characterization of the ~~Subw~~ Watershed in terms of its environmental assets and resources and a description of how the Watershed-based Plan will prevent flooding.
- c) a summary of the existing environmental issues related to watershed-based planning as described in provincial guidelines on the matter.
- d) preparation and testing of a predictive impact assessment model to assess the potential impacts from stressors within ~~the~~ Subwatersheds that exist or will be exacerbated when a new proposed development is approved.
- e) the identification of alternative ~~managed~~ solutions for preserving all Subwatershed functions, in situ, that would otherwise be displaced by the approval of a proposed new development or redevelopment on the Lands. The solutions shall identify where and how watershed functions shall be relocated elsewhere within the proposed development, or by augmenting the Town's supporting infrastructure to support the development being proposed.
- f) the identification of detailed ~~management strategies for implementation~~ implementation plans that describe how the ~~implementation of the Subw~~ Watershed Plan will: prevent flooding; incorporate guidelines for development; and develop Terms of Reference for the preparation of Environmental Implementation Reports, including storm water ~~management strategies~~ and flooding control initiatives; ~~management strategies~~; and, set up ongoing monitoring programs for measuring the effectiveness of these initiatives. ~~the Subwatershed Plan.~~

C8.5 IMPLEMENTATION

Relevant recommendations contained in Watershed and Subwatershed Plans shall be incorporated by Amendment into this Plan. A Subwatershed Plan shall be in place prior to the approval of a Secondary Plan that implements a settlement area expansion. In addition, all applications for *development* shall conform with the recommendations made in an approved Watershed or Subwatershed Plan that have been incorporated by Amendment into this Plan.

Suggested Definitions to Add to the ToBM OP

Unique Character of Communities and Quality of Life

Excerpts from the revised OP

*The overall intent of this Official Plan has at its core the desire to **enhance the quality of life** for Town of The Blue Mountains **residents and business owners**, support the tourism and recreation sector in the Town the recognition of its economic importance locally and regionally, and to establish and maintain a very desirable community that is supported by a clear, concise land use planning framework.*

*The primary purpose of the Official Plan is to provide the basis for guiding growth, protecting the environment and enhancing managing growth that will support and emphasize the Town's **unique character**, diversity, civic identity, recreational and **tourism resources**, rural lifestyle and heritage features. The Town of The Blue Mountains will seek to improve affordability and emphasize connectivity and efficiency and to do so in a way that has the greatest positive impact on the **quality of life** in The Blue Mountains.*

The Vision set out for the Town, to the year 2060, in The Sustainable Path states that “we are a connected and caring Community that blends our heritage with a thriving diverse economy based on the continual preservation and protection of nature. Generations of families live, work and play in our safe, happy and inclusive Town. We are a Community ‘Built to Last’”. The Blue Mountains is a community that:

- *Supports the protection of our natural and rural resources;*
- *Supports sustainability principles;*
- *Values it's heritage; and,*
- *Supports the protection of **community character**.*

To recognize that every community in the Town incorporates its own unique character that must be respected and enhanced.

Commentary

What is meant by community character, unique character and enhancing the quality of life for residents and businesses? There is no definition in the glossary on the use of these terms and how to define these qualities in the context of the Town of the Blue Mountains.

Reference should be made to the Beaver Valley Destination Stewardship initiative, a unique and forward-thinking community resident and civil society group. The Beaver Valley Destination Stewardship initiative (BVDS) is focussed on retaining the community character in the Beaver Valley, an area defined as a destination by Grey County. It should not be up to the government alone to define the ‘community character’ that is to be retained. Residents and civil society must be engaged to define the ‘community character’

that is to be preserved. The community themselves, the BVDS group are best qualified to identify what ‘quality of life’ means in the context of the Town of Blue Mountains, and most specifically in the Beaver Valley community.

The following definition should be included in the glossary.

Destination Stewardship - *a process by which local communities, governmental agencies, NGOs, and the tourism industry take a multi-stakeholder approach to maintaining the cultural, environmental, economic, and esthetic integrity of their country, region, or town. In other words, to ensure that the destination retains and enhances the distinctive attributes that appeal to both residents and tourists. It requires a clear mandate, measurement of standards, community buy-in, and stakeholder collaboration. Practicing destination stewardship is crucial in ensuring that a destination remains attractive, authentic, and sustainable.*

Source: Global Sustainable Tourism Council (GSTC), 2024

The Global Sustainable Tourism Council® (GSTC) establishes and manages global standards for sustainable travel and tourism.

Eco-tourism

Excerpt from A3.6 RURAL AND OPEN SPACE CHARACTER

*Encourage the development of passive low-intensity recreational and **eco-tourism** uses in the Town, provided such uses maintain the natural environment and character of surrounding areas.*

Commentary

There is no definition of ecotourism in the glossary.

The following industry accepted definition should be included in the glossary.

Ecotourism *is responsible travel to natural areas that conserves the environment, sustains the well-being of the local people, and creates knowledge and understanding through interpretation and education of all involved: visitors, staff and the visited”*

Source: Global Ecotourism Network (GEN), 2016 (recognized and acknowledged by GSTC as the authority on ECOTOURISM)

In the Town of Blue Mountains it is important to also define the key principles of ecotourism within the UNESCO Biosphere, a natural asset recognised as being of global significance. The following are the accepted principles of ecotourism in UNESCO designated areas.

Key Principles of Ecotourism in Internationally Designated Areas (i.e. UNESCO Biosphere Regions and Geoparks)

1. Contributes to conservation and biodiversity
2. Sustains the well-being of local people
3. Includes an interpretation/learning experience

4. Involves responsible action on the part of tourists and the tourism industry
5. Tourism experiences are delivered primarily to small groups by small-scale businesses
6. Requires the lowest possible consumption of non-renewable resources
7. Emphasizes local participation, ownership and business opportunities, particularly for rural people

Source: United Nations Environmental Program and the International Ecotourism Society, 2002

Ecosystem-based planning & management

Excerpt from NATURAL HERITAGE FEATURES Section

The Town is committed to maintaining and promoting a healthy natural environment and protecting its unique and special natural heritage features for the present generation and all successive generations. Therefore, an **ecosystem based planning and management approach** is required to guide the land use decision-making process. This approach must emphasize that development not only protect and manage ecosystems but also include the objective of enhancing and restoring ecosystems appropriately. The diversity and connectivity of natural features in an area, and the long term ecological function and biodiversity of natural heritage systems, should be maintained, restored or where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and groundwater features.

Commentary

There is no definition of ecosystem-based management in the glossary.

The following industry accepted definition is suggested.

Ecosystem-based Management - Healthy communities and thriving economies depend on the ecosystems that sustain them. Ecosystem-based management is an approach to planning and management that focuses on maintaining and where necessary restoring the ecological integrity of the land and marine environment as a foundation for sustaining our communities and economies.

In practice, this means asking first what needs to be sustained on the land to look after the needs of species and ecosystems, then planning human activities within these ecological limits so that they can be sustainable over the short and long term. An ecosystem-based approach recognizes that ecological integrity and First Nations' cultural integrity are inextricably linked.

Source: West Coast Environmental Law

The Niagara Escarpment Corridor (Escarpment Ecological Corridor), even though it is part of a UNESCO designated Biosphere Region is not identified as a Key Corridor in the OP and it should be.

Indigenous Engagement

Excerpt

Enhance consultation practices and prioritize engagement with Indigenous communities when considering development applications and studies that may affect matters of mutual interest and concern.

Commentary

The OP should reference the United Nations Declaration on Indigenous Peoples (UNDRIP). UNDRIP references the need for “free, prior and informed consent” (FPIC) emphasizing the importance of recognizing and upholding the rights of Indigenous peoples and ensuring that there is effective and meaningful participation of Indigenous peoples in decisions that affect them, their communities and territories. The Town of the Blue Mountains lies within the Saugeen Ojibway Nation (SON) traditional territory, and perhaps others such as the Petun. The Huron Wendat and Beausoleil First Nation.

Submitted by:

Mike Robbins
130 Valley Road
Town of the Blue Mountains
L9Y 0R7

President of The [Tourism Company Inc.](#)
Board Member with the [Aspiring Georgian Bay Geopark](#) (seeking UNESCO designation)
Board member with the [Escarpment Corridor Alliance](#)
Member of the [IUCN TAPAS Group](#)
Past Chairman of the [Center for Responsible Travel \(CREST\)](#)
Member of the [Trebek Council](#)
Fellow International Member of the [Explorers Club](#)
Fellow of the [Royal Canadian Geographic Society](#)

Shawn Postma

From: Eleanor Ward [REDACTED]
Sent: November 24, 2024 4:11 PM
To: Shawn Postma
Subject: Density in Craigleith

Hello Sean Postma,

I met you at the open house on Friday about the OP.

The Craigleith area has seen so much development over the last few years and now 1200 units are being built.

I've been skiing at Craigleith since the late Seventies. I mourn the loss of so many wild areas.

I advocated to keep the development at Craigleith and Camperdown as 10 units per hectare, not raising it to 15.

There has never been on the part of the town recognizing the we are in Escarpment planning area.

I think overdevelopment in the recreation area of NEP area was not the original plan when the Niagara escarpment commission was formed. I think the plan was to protect as much land as possible for wildlife corridors, protection of streams and creeks, and protect forests.

If the county wants to raise the density, I think a good argument to advance would be to increase the density in the village area and to keep it the same in Craigleith and Camperdown, in Niagara Escarpment plan area.

Thank you for considering this.

Eleanor Ward

Sent from my iPad



ESCARPMENT CORRIDOR ALLIANCE

November 25, 2024

Shawn Postma
Town of Blue Mountains
32 Mill Street, Thornbury

Re: Town of Blue Mountain Official Plan Review of Natural Heritage Policies

Dear Shawn and Town of The Blue Mountains Council,

The Escarpment Corridor Alliance applauds the forward thinking of the Town of The Blue Mountains in commencing a Natural Heritage Study in 2023. We understand that this project is not yet complete and would like to submit some suggestions for consideration in the final phases of this project and in regards to the Official Plan which is open for public comment.

The Escarpment Corridor Alliance has engaged Sumac Environmental Planning to complete a planning policy review of the Town of Blue Mountains Official Plan policies as it relates to natural heritage. The Town of Blue Mountains Natural Heritage policies comply with the direction of the Provincial Policy Statement and are robust. The policies could be strengthened in some areas. See below for our comments.

The strategic objectives of Section A3.2 Natural Environment do not specifically address ecological restoration. Goal number 1 states that the town will "Protect and seek out opportunities for net-gain enhancements to significant natural heritage and hydrologic features and their associated habitats and ecological functions". A definition of net-gain enhancements is not provided, this goal could benefit from clear policies that direct what net-gain enhancements can look like. The County of Grey Official Plan does provide some policy direction on net-gain enhancement policies. The Grey County Official Plan states that "offsetting policies or procedures should target an ecological net gain. Where determined to not be feasible, they should ensure no net loss and fully replace the same level of lost ecosystem structure and function in proximity to where the loss occurs". Therefore the Town of Blue Official Plan Section A3.2 should be expanded upon to ensure no net loss and should direct developers to ensure developers provide compensation habitat.

Additionally, consider including a strategic priority that speaks to natural connections between natural heritage features and map out the existing natural corridors. Ecological corridors (or "ecological networks") support natural processes that are necessary to maintain biological and

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geological diversity, natural functions, viable populations of indigenous species, and ecosystems. Natural connections usually follow watercourses, lakeshores and woodlots. The County of Grey Official Plan speaks to Core Areas and Linkages in Section 7.1 of their Official Plan. This overlay could be of assistance in reviewing a development application that may pose a threat to an existing ecological corridor. Consider policy wording that speaks to creating and protecting linkages and corridors as part of a linked natural heritage system connecting wildlife habitat areas to each other, human settlements to human settlements and people to nature. Inter-municipal coordination to accomplish this goal is encouraged. Linkages are not necessarily located in pristine natural environment but partially occur through agricultural fields

Furthermore, the Natural Environment Section could include some language that provides direction for the intended use of land that contains natural heritage features. For example, the uses could be limited to passive recreational uses and activities that maintain infrastructure authorized under the environmental assessment process or work subject to the Drainage Act.

It is noted that the Official Plan and its schedules do not identify restoration opportunities within the Town's boundaries. It is recommended that Town staff consider a Restoration Opportunities Overlay. While the town is characterized by its vast and beautiful natural heritage, the town is also identified as one of the fastest-growing municipalities in Ontario. The pressures of development on natural heritage are significant and it is important to plan for the long-term health of the environment and its ecosystem functions.

Please let us know if you have any questions.

Sincerely,



Jarvis Strong
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Escarpment Corridor Alliance
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