

January 30, 2025

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

Cc: Adam Smith, Director of Planning & Development Services
Shawn Postma, Manager of Community Planning

From: Brian Nelson

Re: **Follow Up Recommendation Report – Official Plan 5 Year Review (PBS 25.004)**

The following comments are in response to the Staff Report referenced above and focus specifically on Official Plan policies related to Building Height.

These comments are submitted in the context of several Background Reports prepared for our Official Plan Review (Growth Allocations & Fiscal Impact Report, Thornbury Density and Intensification Study, Density and Height Background Paper) that confirm critically important realities about our Town:

- There is more than enough land available within TBM settlement areas to meet Grey County growth targets and accommodate all of the development anticipated for the next 25 years within the current height and density framework.
- There are multiple opportunities within our Town to improve the diversity of our housing stock, through intensification – infill developments, building conversions, and accessory dwelling units that are within established settlement areas and use existing infrastructure and services efficiently.
- TBM is already making progress toward intensification and increased housing diversity. This trend is evident through various medium density developments that are underway or proposed.

Given this context, and along with many residents in our Town, I remain strongly opposed to 5-storey buildings. They would represent a radical change to our Downtown area, amplifying many important and existing planning challenges such as traffic, parking, infrastructure, and compatibility with community character. Further, there is no clear evidence that buildings of this size and scale are needed to achieve our housing goals.

I support the third option outlined in PBS.25.004:

“Maintain maximum permitted height at 3 storeys along the Highway 26 Corridor in Thornbury. Height increase permitted up to 4 storeys only where a community benefit (such as affordable housing or other benefit to the satisfaction of Council) is received as part of the project.”

My support assumes that the addition of a fourth storey would be permitted only if all of the detailed criteria included in the most recent draft of the updated Official Plan to ensure compatibility with adjacent buildings and neighbourhoods are strictly enforced, and updated Community Design Guidelines are in place. Further, any 4-storey buildings must deliver affordable or attainable housing units. “Other” benefits are insufficient; there is no point to allowing taller buildings if they do not make measurable, enforceable and sustainable contributions to our housing goals.

This leads to a closely related land use planning tool addressed in the proposed OP update: the Community Planning Permit System (CPPS).

The CPPS is a tool that has not yet been applied anywhere in our Municipality. Based on information provided throughout the Official Plan Review, the CPPS offers options to secure community benefits and control site planning details that may not be possible through conventional planning processes. A CPP By-law consolidates zoning, site plan review, and potentially other by-laws into one process. All public engagement occurs up-front, and no third-party appeals are permitted.

The primary reason we have heard for considering the possible implementation of a CPP By-law in TBM is related to building height, and specifically the potential to secure affordable housing units and enforce detailed design criteria. With this in mind, policies in our OP that would enable a CPP By-law must be carefully worded to ensure that any proposed application is thoroughly studied, that the purpose and benefits are clear, that there are ample opportunities for public engagement, that residents fully understand all implications, and that this tool cannot be abused or used in any way that conflicts with our Official Plan.

The following changes to proposed Section E1.2 COMMUNITY PLANNING PERMIT BY-LAW are recommended:

- Delete “including the entire Town” in Section E1.2 a). Town-wide application would represent a fundamental change to our land use planning processes, with multiple unintended consequences and major public engagement challenges.
- Add a statement to require any CPP By-law to conform to the policies of the Official Plan.
- Add a statement to ensure that a site-specific Official Plan Amendment that defines the purpose and area covered by a proposed CPP By-law must be passed prior to implementation.
- Modify language in Section E1.2 j) to require Council review and approval of any CPP By-law application or amendment that includes a change in building height, density, use, or design criteria.

These changes to CPPS policies would help to ensure effective public engagement – a critically important priority in our Town – for the potential application of a tool that is not yet well understood but could have a major impact on planning and development.

Thank you for the opportunity to comment.