

April 24, 2025

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

cc: Adam Smith, Acting CAO and Director of Planning & Development Services
Shawn Postma, Manager of Community Planning

From: Blue Mountain Ratepayers Association, Planning Sub-committee

Re: BS.25.005 Official Plan Follow-Up Report to the February 4th COW Discussion.

Please accept these comments from the BMRA planning sub-committee in response to the BS.25.005 Official Plan Follow-Up Report to the February 4th COW Discussion.

BMRA has been engaged and has provided feedback and suggestions throughout the Official Plan Review. We appreciate that Council and Staff are working to address some of the most contentious and critical areas such as building heights, density and affordable housing. We would also like to note our appreciation for the recent adoption of a new Growth Management Specialist position.

Building Heights: The current maximum building height is three storeys across TBM, except for the Blue Mountain Resort where the maximum is five storeys. While TBM staff have recommended increasing the limit to five storeys along Highway 26 in Thornbury, there is widespread opposition to taller buildings. Many questions and concerns have been raised about exactly where and under what conditions they would be permitted. BMRA has recommended retaining the three-storey height maximum, with the possible consideration of a fourth storey if design guidelines such as fourth storey setbacks are in place and enforced, and specific community benefits such as attainable/affordable housing are secured. BMRA also supports the critical role of high-quality design and the importance of ensuring that updated Community Design Guidelines reflect the character and heritage of many communities within TBM, and are incorporated into the OP.

BMRA encourages Council to reject all options presented in the Staff Report and adopt the following: Maintain the maximum of 3 storeys across the Town (except Blue Mountain Village). Maintain the maximum of 3 storeys along the Bruce Street Corridor. Permit up to 4 storeys along Highway 26 in Thornbury from Peel Street to Elma Street and from Elgin Street to Russell Street right-of-way only where 4 storeys offer an affordable housing option and the building is setback on the 45 degree plane as per discussion papers.

Affordable Housing: The need for a more affordable and attainable housing units in TBM is well-established, and our OP must play a key role in addressing this gap. The OP update identifies various tools to encourage greater housing diversity such as community benefits, the Community Improvement Program, developer incentives and the Community Planning Permit System (see below). However, questions remain about whether and how these tools can be used to go beyond encouragement to requiring affordable and attainable housing as part of new developments.

BMRA supports the staff recommendation 1C - Expand Section D.7.4 a) to also include the sample menu of affordable housing options that could be considered by Council. BMRA further recommends that the CIP contribution be a sizeable amount that is defined in advance.

Density: The OP update includes several increases in permitted building densities. Some of these have been identified by BMRA as problematic. A proposed increase in the maximum density of multi-unit buildings to 100 units per hectare, for example, would be extreme and unnecessary. A proposed increase in the maximum density for developments in Residential/Recreational areas from 10 to 15 units per hectare would represent a radical and unnecessary change.

BMRA supports Option 3A: Maintain the existing maximum of 10 UPH for the Residential Recreational Area designation as existing in the current Density Policies of the 2016 Official Plan.

Parkland: BMRA suggests that the test for cash in lieu of parkland should be “unsuitable size, shape **AND** location” and that cash may be considered at a **market** amount.

Georgian Trail – BMRA supports 5B and appreciates the proposed amendment.

Tree protection: BMRA proposes that infrastructure decisions should respect the Town’s goal to “prioritize tree preservation” and delete “wherever feasible” in the first paragraph of this section.

Other Priority Areas

BMRA would also note that there are three additional areas within the OPR that are not yet adequately addressed and we look forward to reviewing details as they are further developed.

Natural Heritage Features: Protection of our natural heritage features is a top land use planning priority. Critically important work to assess and map these features, focused primarily on our rural areas, has been done as part of the Town’s Natural Heritage Study (NHS) and Natural Asset Inventory (NAI). BMRA has advocated for updating the OP to incorporate findings from the NHS and NAI. This has not yet been done. We are told a future OP amendment will be forthcoming and we will be monitoring this closely.

Environment and Climate Change: Several community-based planning efforts, including most recently the TBM Future Story, have recommended strong environmental protection and climate change mitigation/adaptation policies addressing areas such Green Development Standards and tree canopy protection, and focused on settlements as well as rural areas. Some progress has been made in the OPR at the general level of Vision, Guiding Principles, Goals and Strategic Objectives. More work is needed to strengthen more specific policies and drive implementation.

Community Planning Permit System: The proposed OP update would enable the application of a land use planning tool – the Community Planning Permit System (CPPS) – that can replace the tradition Zoning Bylaw as a tool for implementing OP policies. We are told that the advantage of the CPPS is that it offers the municipality more ways to secure key benefits in areas such as housing, site planning and design. The concern is that all community engagement occurs up front, and third-party appeals are not permitted. BMRA has advocated for a very cautious approach to application of a CPPS, beginning with a pilot, and will be monitoring this very closely.

Thank you for the opportunity to provide these comments.