



*Land Use Planning, Development Approvals & Project Management Services*

March 29<sup>th</sup>, 2023

Mr. Michael Benner, *MCIP, RPP*  
Senior Planner  
Town of the Blue Mountains  
32 Mill Street, Box 310  
Thornbury, Ontario  
NOH 2P0

Dear Mr. Benner,

***Re: Addendum to Planning Opinion, dated January 2023  
Plan of Subdivision & Zoning By-law Amendment  
Part of Lots 35 & 36, Concession 10  
Town of the Blue Mountains, County of Grey***

This addendum letter has been prepared in response to the 'Letter of Incomplete Application' (see *Appendix A*), issued jointly by the County of Grey and the Town of the Blue Mountains, dated March 7<sup>th</sup>, 2023, with respect to the above noted applications.

The joint letter states that planning staff at the County and Town have completed a preliminary review of the above noted applications and supporting materials received January 30, 2023. Based on that review, and the new complete application timing provisions contained in the Planning Act, County and Town planning staff are deeming the applications incomplete, in accordance with Section 34(10.4) and Section 51(19.1) of the Planning Act.

Although Town & County Staff acknowledge that the supporting materials requested during the January 2022 pre-consultation have been received, Staff is requesting additional information specifically addressing the proposed lot fabric and housing typology as it pertains to affordable/attainable housing. The Town directs us to the following sections in their Official Plan:

*"Section A3 of the TBMOP sets out the goals and strategic objectives of the Plan. Subsection A3.10 sets out goals and objectives for housing. Subsection A3.10.0 states that the housing goal is:*

*To provide an appropriate housing supply and range of housing choices to meet the needs of present and future residents.*

*Subsection A.3.10.2 sets out the strategic objectives of housing that includes:*

*Assist in the achievement of residential intensification and affordable housing by encouraging opportunities for mixed-use development in appropriate locations.*

*Section D.7.3. of the OP also notes that:*

*HOUSING MIX It is the policy of this Plan to ensure the provision of a range of housing types in the Town's settlement areas. New development that assists in achieving this housing mix shall be encouraged. In addition, Official Plan Amendment applications that propose the down-designation of sites from medium and high-density housing shall be discouraged, since these sites will ultimately assist in achieving an appropriate balance of housing in the Town."*

Based on the above three policies, Staff is specifically requesting that we address the following:

**1. What different forms of housing were explored during the initial design concepts for these lands?**

**Comment:**

Other types of units (semi-detached & townhouses) were explored. However, due to the size of the development parcel and the density limitations (see #4 below), the only economically viable form of development is single dwelling lots.

**2. Do the lands have opportunities to also include different housing types particularly on some of the irregular shaped parcels?**

**Comment:**

The subject parcel does not provide any opportunity for different housing types. See #1 above and #4 below.

**3. What are the anticipated dwelling sizes and price points for this development?**

**Comment:**

The anticipated dwelling sizes will be similar to those on High Bluff Lane and the surrounding area. Although difficult to estimate price points into the future, we would anticipate sale prices to be approximately \$1.6 to 1.9 million.

**4. What opportunities exist for higher density housing types, and can these units accommodate price points to meet affordable or attainable housing criteria?**

**Comment:**

The County of Grey Official Plan designates the subject lands within the Recreational Resort Area and Hazard Lands designations. While these settlement areas are fully serviced, they do not contain the same range of uses as a traditional urban centre or Primary Settlement Area, and are instead focused on a recreational component as the basis for development (Sec. 3.3.4).

The Town of the Blue Mountains Official Plan designates the subject lands Residential Recreational Area and Hazard. Lands designated Residential Recreational Area reflect the settlement area designated as Recreational Resort Area in the County Official Plan.

Permitted density on lands designated Residential Recreational Area is limited to 10 units per gross hectare. Hazard Lands cannot be included for the purpose of calculating maximum permitted development density. The net gross hectareage of the parcel is 5.028 ha X 10 = 50 (50.28) units.

The subject development must also comply with the current roadway cul-de-sac engineering standards, which limit the maximum density on this parcel to 40 dwellings.

The proposed development proposes 38 dwellings, which complies with the more restrictive density limits of the engineering standards.

As noted in our Planning Opinion submitted in January 2023, the subject property is located at the western 'gateway' to the Town of Thornbury, on the north side of Highway 26. We remain of the opinion that attainable/affordable housing is more appropriately located in a more urban setting where there is convenient access to local stores & services, institutional and public service facilities, sidewalks and existing or planned transit.

The closest grocery store (Foodland) is approximately .7 km from the eastern edge of the site and the downtown core of Thornbury is approximately 1.5 km. The Town of Thornbury has no public transit, nor is any anticipated in the near future.

Affordable/attainable housing is not appropriate for this site, however, the applicant is willing to offer the Town \$5,000 per lot (\$190,000), to be collected at building permit stage, as a contribution to the Blue Mountains Attainable Housing Corporation.

**5. *Has there been any consideration of the inclusion of accessory residential units in this development?***

***Comment:***

The applicant is willing to rough-in accessory rental basement apartments, with dedicated entry and parking for 16 of the 38 units (40%) on the south side of the proposed internal road.

***Conclusion:***

Not all sites are appropriate for affordable housing. The subject site is not located in an urban setting. There is no public transit or sidewalks to provide ease of access to local stores & services or public service facilities. This would be especially problematic during winter months.

Due to the maximum density limitation policies, other types of housing units such as semi-detached and/or townhouses are not viable options for the site.

Our opinion remains that this particular site is not suitable for affordable/attainable housing.

We do acknowledge there is a challenge for affordable/attainable housing in the Town.

The Blue Mountains Attainable Housing Corporation's (BMAHC) mandate is to facilitate the supply of suitable, adequate, attainable, and sustainable ownership and rental units in the Town of The Blue Mountains that are accessible to a larger portion of the population.

The applicant is proposing to provide rough-in basements in 40% of the units for basement apartment rental purposes. In addition, a monetary contribution of \$190,000 (\$5,000 per unit) is proposed to assist in BMAHC's facilitation of attainable housing within the Town.

We trust the above satisfactorily addresses the additional information requested to deem our submission complete.

Respectfully submitted,  
PLAN WELLS ASSOCIATES



Miriam Vasni, *MCIP, RPP*

c.c.: Hiba Hussain, *MCIP, RPP*  
Daniel Pasta, Owner  
Shelley Wells, *MCIP, RPP*