

OPA 11 Comment Summary and Response Document – Updated July 4, 2022

Comment #	Commentor	Comment Summary	County Staff Response	Policy or Mapping Changes Recommended
1	Various Including: Marian Ratcliffe, Ken Knox, Karen Poce, Romulus Barabas, Chris Palmer, Bluewater Astronomical Society, Devin Glew, Frank Williams, John Hlynialuk, & Lorraine Rodgers	<ul style="list-style-type: none"> <li>Need for stronger dark sky policies to avoid light pollution</li> </ul>	County staff see merit in adding additional dark sky policies and have proposed changes to a few sections of the Plan, including a new section 7.14 specifically dealing with dark sky protection.	Modifications 93, 94, 95 and 96 are proposed to address the comments with respect to dark skies.
2	Various Including: Town of Hanover, Hanover Planning Advisory Committee, Barry's Construction, Ben & Tracy Plakholm, Jack Schenk, Warren Dickert, & Peter Hambly.	<ul style="list-style-type: none"> <li>Support for the future secondary plan area mapping adjacent to Hanover</li> </ul>	Acknowledged	No additional changes needed at this time.

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3	Hanover Planning Advisory Committee	<ul style="list-style-type: none"> <li>The need to expand 2<sup>nd</sup> Street to Grey Road 28 in Hanover</li> </ul>	<p>The expansion of 2<sup>nd</sup> Street to Grey Road 28 was originally shown in the adopted County Official Plan Amendment (OPA) # 122. Following County Council’s adoption, OPA 122 was appealed to the Ontario Municipal Board (OMB). As part of the minutes of settlement with the appellant, the County, West Grey, and Hanover, it was agreed that Secondary Schedule 3Q (now Secondary Schedule 3k in Recolour Grey) would be amended to remove the future roads in favour of text descriptions in the amendment itself. Section 11.8(4) of the County Plan (derived from those minutes of settlement) states:</p> <p><i>“The construction of new municipal arterial/collector roads crossing generally in the area of the easterly Hanover-West Grey municipal boundary between the northerly limit of Grey Road 4 and the southerly limit of Knappville Road may be required. The alignment, design and need for any new municipal arterial/collector roads within those limits will be determined by a Class Environmental Assessment Act and the goal of minimizing any impact on existing agricultural operations shall be a significant consideration. An amendment to his Plan will not be required for the identification or construction of any new municipal arterial/collector roads approved pursuant to the Class Environmental Assessment.”</i></p> <p>County staff do not see the needs for further amendments at this time.</p>	No changes needed at this time.
4	Andrew Pascuzzo	<ul style="list-style-type: none"> <li>Request to remove a rehabilitated gravel pit at 152149 Southgate Sideroad 15</li> </ul>	County staff concur with this request based on confirmation received from the Ministry of Northern Development, Mines, Natural Resources and Forestry (MNDMNR) proving that the license has been surrendered and the site rehabilitated.	Site-specific changes made to Schedule B through modification 105. See Schedule A-47.
5	Bianca Metz	<ul style="list-style-type: none"> <li>Support for tiny homes policies</li> </ul>	Acknowledged	Added definition for Tiny Homes which have to be habitable year-round and need to meet Ontario Building Code and Municipal Zoning.
6	Saugeen Valley Conservation Authority (SVCA)	<ul style="list-style-type: none"> <li>Concerns with natural heritage offsetting policies. These policies should be amended to be reserved for essential public infrastructure or works.</li> </ul>	Further consultation was undertaken with SVCA to clarify the offsetting policies. Based on correspondence dated April 25, 2022, SVCA is now satisfied with the proposed changes.	Modifications 35 and 108 clarify the County’s direction on natural heritage offsetting.

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7	Graham Barker Cuesta Planning	<ul style="list-style-type: none"> <li>Support for a mapping change in Georgian Bluffs</li> </ul>	Acknowledged	No changes needed at this time.
8	City of Owen Sound	<ul style="list-style-type: none"> <li>Questions about the suitability of additional residential units (ARUs) outside of settlement areas on individual private services.</li> </ul>	Current ARU policies would not limit municipalities from requesting additional information (such as a servicing report or establishing minimum lot sizes) within their zoning by-laws to support decision-making about where ARU's may be appropriately located. There is also a recognized need for ARUs to support rural employment opportunities (farm labour), as well as diverse family needs (such as providing housing for retired farmers, while permitting a new generation of younger farmers to take-over the farm). ARUs in rural areas have minimum influence on MDS (provided they are within the farm cluster), and are considered a more sustainable land-use option than rural lot creation.	Section 4.2.5 has been updated to encourage municipalities to develop Short-term Accommodation By-laws to assist in regulating the use of ARUs, in order to preserve them for long-term residential use (as opposed to short-term tourist use).  Added in modification # 116 to require a nitrate study for lot creation on lots less than 0.4 ha in size, and giving the option for nitrate studies for ARUs on privately serviced lots less than 0.4 ha in size.
9	Wesley Wilson	<ul style="list-style-type: none"> <li>Support for surplus farm dwelling consent policy updates and preservation of barns.</li> </ul>	Acknowledged	No changes needed at this time.
10	City of Owen Sound	<ul style="list-style-type: none"> <li>Questions about applying minimum density policies to all Primary Settlement Areas equally.</li> </ul>	County staff support these proposed changes and discussed with municipal planners on April 8, 2022. Based on the feedback received, changes are being recommended as part of modification # 6 to Official Plan Amendment # 11.	In modification # 6, section 3.5(5) has been modified to reference 25 units per net hectare for new residential developments in all Primary Settlement Areas, in accordance with any detailed municipal official plan policies. New subsections (7) – (9) have also been added to clarify both density and residential unit type policies.
11	City of Owen Sound	<ul style="list-style-type: none"> <li>Support for climate change policies and suggestions to strengthen them to include policy wording that specifically prioritizes directing growth and development to fully serviced settlement areas where existing infrastructure and public service facilities are available and can be optimized.</li> </ul>	Now that the Climate Change Action Plan has been approved additional policy tweaks have been changed in the Plan.	Through modifications 5, 10, 11, 29, and 102 – 104, sections 3.5, 4.2.4, 4.2.5, 7.13, 8.2, 8.10(3) and 8.10(10) have been amended to strengthen the County's support for climate change mitigation.

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12	Township of Southgate	<ul style="list-style-type: none"> <li>Minor mapping changes in Southgate needed, including;                             <ul style="list-style-type: none"> <li>A-10 Harris Crescent should include all of the development, and</li> <li>A-15 mapping of Plumeville, which the east side of McFarlin Drive is in Southgate, refers to just West Grey.</li> </ul> </li> </ul>	<p>Schedule A-10 has been further modified to include all of Harris Crescent.</p> <p>Schedule A-15 has been further modified to include both the labels for the Township of Southgate and the Municipality of West Grey.</p>	<p>Schedule A-10 has been further modified to include all of Harris Crescent.</p> <p>Schedule A-15 has been further modified to include both the labels for the Township of Southgate and the Municipality of West Grey.</p>
13	Kristine Loft on behalf of Solomon Martin and Community	<ul style="list-style-type: none"> <li>On-farm diversified uses should also be considered on smaller Agricultural farm parcels between 10 and 19.9 hectares.</li> </ul>	<p>Staff see merit in this suggestion and have proposed some policy changes accordingly, including the requirement for a farm business registration number for anyone seeking to establish an on-farm diversified use.</p>	<p>Modifications 17, and 90 – 92 are proposed to allow for on-farm diversified uses on smaller properties in the Rural, Special Agricultural, and Agricultural designations, subject to the size criteria in Table 8 of the Plan. A new requirement has been added for landowners seeking permission for an on-farm diversified use to be a bona fide farmer, similar to the requirements for surplus farm dwelling severances.</p>
14	Town of The Blue Mountains	<ul style="list-style-type: none"> <li>Request to defer a decision on OPA 11 until further growth management work has occurred at the municipal level.</li> </ul>	<p>Based on additional work completed by Town staff and the consultants who have been hired to work on their Town Official Plan Review (SGL and Parcel) no additional changes are needed here.</p>	<p>No further changes needed at this time. Town of The Blue Mountains consultants SGL and Parcel have concurred with the County's growth projections and allocations.</p>
15	Town of The Blue Mountains	<ul style="list-style-type: none"> <li>Questions about the growth numbers, employment projections, and the seasonal population projections.</li> </ul>	<p>Based on additional work completed by Town staff and the consultants who have been hired to work on their Town Official Plan Review (SGL and Parcel) no additional changes are needed here.</p>	<p>No further changes needed at this time. Town of The Blue Mountains consultants SGL and Parcel have concurred with the County's growth projections and allocations.</p>
16	Town of The Blue Mountains	<ul style="list-style-type: none"> <li>Support for updated density policies in Primary Settlement Areas, as well as the additional residential unit policies.</li> </ul>	<p>Acknowledged</p>	<p>No further changes needed at this time.</p>
17	Town of The Blue Mountains	<ul style="list-style-type: none"> <li>Support for rail corridor policies</li> </ul>	<p>Acknowledged</p>	<p>No further changes needed at this time.</p>

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18	Sybrielle Wang	<ul style="list-style-type: none"> <li>Questions about additional residential unit policies from the perspective of a neighbouring municipality looking at their own housing policies.</li> </ul>	Acknowledged	No further changes needed at this time.
19	Tomas Glancy & Walker Aggregates	<ul style="list-style-type: none"> <li>Suggested changes to the aggregate, bedrock, and shale policies with respect to lot additions in these areas and new non-agricultural uses on existing lots of record.</li> </ul>	County staff agree with some of the points raised with respect to sections 5.6.2(7) and 5.6.6. Staff have recommended some slightly different wording to that used by Walker Aggregates.	Modifications 24 and 26 have been further modified to address these comments.
20	Bob List	<ul style="list-style-type: none"> <li>Updates are needed to the wording in sections 2 and 2.1 of the Plan. Suggested improvements include;                             <ul style="list-style-type: none"> <li>recognizing the role of the County and member municipalities in supporting future growth,</li> <li>identifying the variety of factors that shape growth within the County,</li> <li>removing settlement area boundaries from the County Plan, in favour of provide textual numerical growth guidance with a dot shown on the County land use schedules instead,</li> <li>noting that the County's projections are not 'limits' on growth,</li> <li>identifying the role of infrastructure in supporting growth and determining future settlement area expansions, and</li> <li>noting that not all current settlement areas have enough land to meet their growth needs within the planning horizon.</li> </ul> </li> </ul>	<p>County staff agree with some of the points raised with respect to sections 2 and 2.1 of the Plan. Changes have been made to further clarify the role of the County in working with member municipalities to plan for growth and infrastructure needs.</p> <p>Some of the comments raised by Mr. List could not be supported based on the County's defined legislative role through the <i>Planning Act</i>, and our requirement to be consistent with the Provincial Policy Statement. Other changes could not be supported such as removing settlement area boundaries in the County Plan, based on not all member municipalities in Grey having their own municipal official plan, and therefore settlement area boundaries are still needed at the County level.</p>	A number of changes have been made to proposed modification # 2 to address these comments. The population, employment, housing and seasonal projection numbers have not changed from the recommendations of the 2021 Growth Management Strategy.
21	Bob List	<ul style="list-style-type: none"> <li>Additional clarification needed in section 3.5 with respect to density for member municipalities to accommodate a wide variety of densities provided that the minimum overall density is achieved.</li> </ul>	Section 3.5(5)(a) allows municipalities to consider lower densities provided other medium or high-density areas provide for densities that exceed the required minimum densities.	No further changes needed at this time.
22	Bob List	<ul style="list-style-type: none"> <li>Support for changes to section 8.2(j) with respect to access.</li> </ul>	Acknowledged	No further changes needed at this time.
23	Bob List	<ul style="list-style-type: none"> <li>Need for changes to Schedule A and Secondary Schedule 2F to expand the boundary of Markdale.</li> </ul>	A private development application (County file number 42-08-180-OPA-12) has been submitted to amend this settlement area boundary. OPA 11 will not amend the settlement area boundary of Markdale at this time, and will defer to the outcomes of the private development application.	No further changes needed at this time.

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24	Local Municipal Planners Comments	<ul style="list-style-type: none"> <li>In a verbal discussion with municipal planners from across Grey, it as noted that the County's Primary Settlement Area density policies can be seen as a barrier to supporting new higher density residential growth such as apartment buildings.</li> </ul>	<p>A new subsection (7) is added to section 3.5 to clarify that apartment buildings and mixed-use developments will often exceed the County's minimum density policies, but are needed and supported.</p>	<p>A new modification # 98 is proposed to address the comments.</p>
25	Brian Nelson	<ul style="list-style-type: none"> <li>The County should allow TBM to complete studies related to the Town's capacity to manage growth in a manner that is financially, socially and environmentally sustainable prior to the adoption of OPA 11. The County's numbers do not consider current constraints in the Town including:                             <ul style="list-style-type: none"> <li>limited and in many cases outdated and deficient public infrastructure,</li> <li>a lack of essential services needed to create complete communities in many areas,</li> <li>extensive specialty agricultural lands, and</li> <li>a broad range of critical natural systems that must be protected, including Escarpment lands, watersheds, Georgian Bay shoreline, woodlands, public open spaces, etc.</li> </ul> </li> <li>Extrapolation of historical data to determine growth targets is simplistic, misleading, and focused narrowly on the provision of housing units.</li> </ul>	<p>As per the responses to comments # 14 and 15 in this table, County staff have deferred a decision on OPA 11 in order for the Town to complete their growth management work. Town of The Blue Mountains consultants SGL and Parcel have concurred with the County's growth projections and allocations.</p> <p>County staff acknowledge Mr. Nelson's comments about constraints that may have an impact on the Town's ability to accommodate growth in the future. As the Town works through future studies or infrastructure planning exercises, County staff are happy to consider further changes to the County Plan if necessary.</p>	<p>No further changes needed at this time.</p>
26	Pamela Spence	<ul style="list-style-type: none"> <li>Questions about the growth numbers, employment projections, and the seasonal population projections and how they impact the Town of The Blue Mountains</li> </ul>	<p>County staff responded directly via email to Ms. Spence, which later informed the Blue Mountain Ratepayers Association comments.</p>	<p>No further changes needed at this time.</p>

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27	Lucy Richmond	<ul style="list-style-type: none"> <li>In the 2019 County Official Plan a new settlement area is established in the Town of The Blue Mountains called Residential Resort.</li> <li>If the Recreational Residential Land Use of the Town has been legitimately re-designated by the County to "Settlement Area" under the "Places to Grow Act", growth will no longer be limited to a maximum density of 10 units per Hectare, plus 40% Open Space as written in the Town's current Official Plan. When the plan is reviewed and updated, the new density limit will automatically be, 20 units per hectare, minimum, as it is for every other Settlement Area designated in Ontario under the Act. Furthermore, the Province directs intensification to "Settlement Areas": no upper limit is stated.</li> </ul>	<p>The County's 2012 Official Plan designated the Recreational Resort Area settlement area designation which is what Ms. Richmond is referring to. The 2019 County Official Plan also maps these lands, but they were not 'new' to the 2019 Official Plan. OPA 11 has not proposed to change the minimum density for the Recreational Resort Area (though the County is renaming it the Recreational Resort Settlement Area to avoid any confusion), and still defers to the Town Official Plan's density. Future changes to the Town Plan could come at the time of the Town's Official Plan Review, based on any changed requirements from the Province (legislative or policy), or a desire for change from the Town, but at this time OPA 11 is not requiring a change in density policies in the Recreational Resort Settlement Area (as it is proposed to be renamed).</p> <p>It is also worth noting that Grey County is not subject to the policies of the Provincial Growth Plan.</p>	No further changes needed at this time.
28	Township of Wellington North	<ul style="list-style-type: none"> <li>Need to look at lands in West Grey for the possible expansion of industrial land supply in Wellington North.</li> </ul>	Grey County is not considering any boundary expansions in this area at this time as part of OPA 11. Grey County would be happy to explore this matter future with Wellington North, Wellington County, and the Municipality of West Grey, via a separate exercise.	Based on the direction from County Council through staff report <a href="#">Addendum to PDR-CW-17-20</a> , some additional wording is proposed to section 3.4.3 through modification # 89 to reflect the County's role in boundary coordination between municipalities.
29	Wellington County	<ul style="list-style-type: none"> <li>Highlights some potential mapping errors on Schedule A around Mount Forest, as well as some of our Appendices which show features in other counties.</li> </ul>	County staff are happy to correct any errors regarding Schedule A. With respect to the Appendices, it appears the current County Official Plan is inconsistent with respect to how features are shown in neighbouring counties across the appendices i.e. some are shown, some are not, and some are grayed out where as others are not.	Land use schedules and appendices have been corrected through modifications 118 - 122 to remove any features being shown outside Grey County boundaries. See Schedules A-50 – A-54.
30	James Magwood	<ul style="list-style-type: none"> <li>Concerns with respect to any Hanover expansion or future secondary plans lands impacting the Magwood family farmlands.</li> </ul>	In looking at the two pockets of land being considered for future secondary plan areas, there does not appear to be any Magwood family lands in the northern section, but there are two properties totalling approximately 40 hectares of land in the southern section. Identifying these lands in the County Plan is based on work from the Town of Hanover looking at their future growth needs. Adding this future secondary plan overlay does not impact the ability of the current landowners to continue to farm their lands. Should a future secondary plan be sought for these lands, it may or may not have an impact on the future use of these lands for agricultural purposes.	No changes needed at this time.

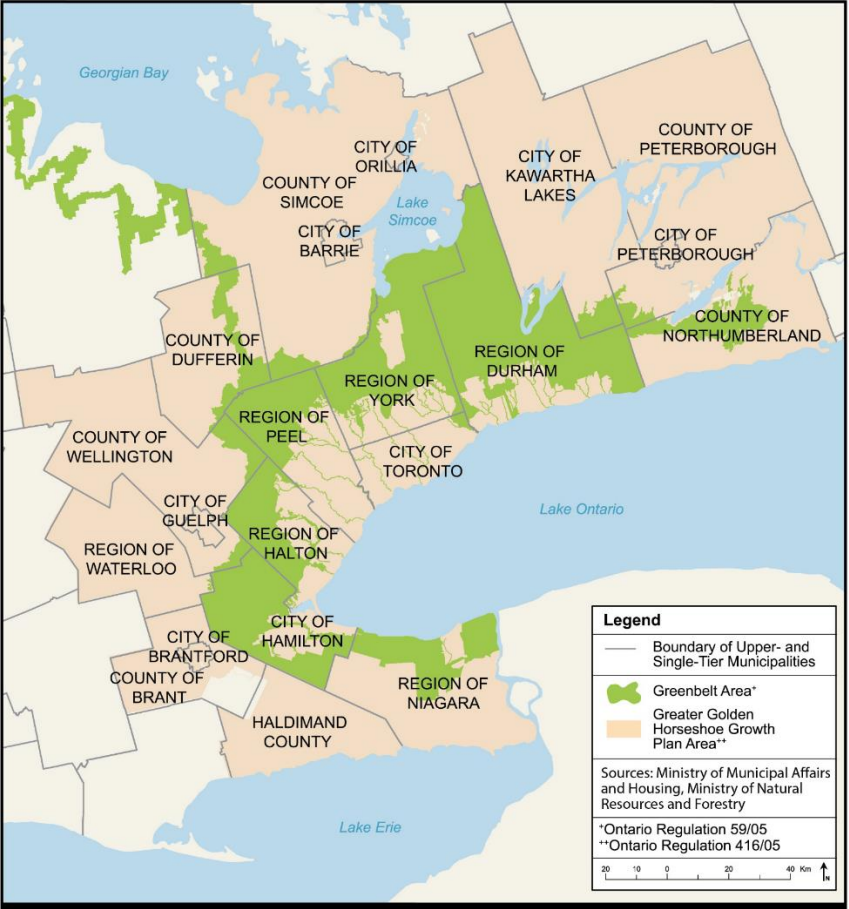
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31	MHBC / Flato	<ul style="list-style-type: none"> <li>The Province of Ontario recently added 3 pockets of land to the settlement area of Dundalk via a Ministers Zoning Order (MZO). MHBC have asked that the County consider adding these lands to the Primary Settlement Area as part of OPA 11. MHBC have also asked that OPA 6 be recognized in the OPA 11 schedules.</li> </ul>	Based on the changes already made through the MZOs, County staff support adding these lands as Primary Settlement Area and Hazard Lands in Dundalk.	A new modification # 99 is proposed to address the comments and update Schedule A Map 2 and Secondary Schedule 2q. See Schedule A – 49.
32	Jim Torrance on behalf of Blue Mountain Ratepayers Association	<ul style="list-style-type: none"> <li>Remove TBM growth projections from Grey County's Official Plan Amendment 11 until such time that TBM has completed their own growth studies in relation to their Official Plan Review and provide same to the County;</li> <li>Allow TBM to determine their own intensification, employment and land inventory projections and incorporate same into their plans and those of the County;</li> </ul>	<p>As per the response to comment # 14,15, and 25 in this table. Town of The Blue Mountains consultants SGL and Parcel have concurred with the County's growth projections and allocations.</p> <p>Staff would note that section 1.2.4 of the PPS requires the County to forecast and allocate growth in consultation with municipalities. Town staff were instrumental in supplying input and data into the County's 2021 GMS.</p>	No further changes needed at this time.



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33	Jim Torrance on behalf of Blue Mountain Ratepayers Association	<ul style="list-style-type: none"> <li>Remove settlement area references to Recreational Resort or Residential Recreation land uses and reference them as special recreation-related or environmentally- sensitive serviced areas where growth is limited;</li> </ul>	<p>County staff would respectfully disagree with this recommendation. County staff have worked with municipalities, as well as Niagara Escarpment Commission and Provincial staff over the years to determine what the appropriate level of growth may be for Recreational Resort Areas. Furthermore, individual municipalities, including the Town of The Blue Mountains, have made significant investment in infrastructure in these areas including roads, municipal water/sewer, recreational facilities, etc. While County staff acknowledge that such areas are different than some other settlement areas such as Primary Settlement Areas like Thornbury or Owen Sound, the Recreational Resort Area is still a settlement area. The Province has supported the County’s designation of such settlement areas through approving the County Official Plan, which was most recently approved in 2019. At that time, and through previous approvals, County and Provincial staff determined that such designations were consistent with the PPS and not in conflict with the Niagara Escarpment Plan. County staff would note that the 2014 PPS definition of settlement areas did not change when the Province approved the 2020 PPS.</p> <p>Staff would further note that the PPS requires the efficient use of land and infrastructure. Providing for growth opportunities in the County and Town Official Plans, while still providing for the protection of significant environmental features, achieves this objective of the PPS.</p> <p>As a result, staff do not recommend removing the settlement area designation from the Recreational Resort Area.</p>	<p>No further changes needed at this time. Proposed modification # 97 will rename the Inland Lakes and Shoreline, Recreational Resort Area, Sunset Strip Area, and Industrial Business Park land use types to Inland Lakes and Shoreline Settlement Area, Recreational Resort Settlement Area, Sunset Strip Settlement Area, and Industrial Business Park Settlement Area. Recolour Grey already defined each of these land use types as settlement areas, but there was still some confusion amongst readers of the Plan, so this will help further clarify that they are in fact settlement areas.</p>

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34	Jim Torrance on behalf of Blue Mountain Ratepayers Association	<ul style="list-style-type: none"> <li>Incorporate all significant environmental features into the Natural Heritage System mapping of Core Areas and Linkages on Schedule C.</li> </ul>	<p>The County Official Plan maps a number of environmental features on Schedules A and C, as well as Appendices A and B. It is not feasible to show all these features on one schedule or appendix based on scale of the map and the overlapping nature of any of the features. County staff have produced this map (i.e. showing all of the environmental features) and it simply becomes too busy and unreadable. All features, regardless of which schedule or appendix they are shown on, have protection under the PPS and the County Plan. Many of the Core Areas on Schedule C, are made up of features from Schedule A as well as Appendices A and B such as Wetlands, Significant Woodlands, Areas of Natural and Scientific Interest (ANSIs), Other Wetlands, watercourses, etc. Similarly, many of the Linkages shown on Schedule C come from the Significant Valleylands and watercourses on Appendix B. More information on the Core Areas, Linkages and Grey's Natural Heritage System can be found in <a href="#">Green in Grey</a>.</p>	No further changes needed at this time.
35	Lucy Richmond	<ul style="list-style-type: none"> <li>The Authority to approve the Town's Official Plan, on the next revision, is Grey County, not the Ministry of Municipal Affairs and Housing. It is unclear in what ways the Town Plan must comply, vs be consistent with, the County Plan.</li> </ul>	<p>The Town's future Official Plan updates will be required to:</p> <ul style="list-style-type: none"> <li>Have regard of matters of Provincial interest under the <i>Planning Act</i>,</li> <li>Be consistent with the Provincial Policy Statement,</li> <li>Not be in conflict with the Niagara Escarpment Plan, and</li> <li>Conform to the County of Grey Official Plan.</li> </ul> <p>The County is the approval authority for amendments to the Town's Plan and/or a new Town Official Plan.</p>	No further changes needed at this time.

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36	Lucy Richmond	<ul style="list-style-type: none"> <li>Re-designation of Land Use in a Municipality must be supported by a "comprehensive review" of the subject lands and the submission of a "growth plan" to the Ministry of Infrastructure under the "Places to Grow Act". That is the legislative structure all Municipalities, lower tier and upper, are to respect.</li> </ul>	<p>The Provincial Policy Statement and the County Official Plan require a comprehensive review in two specific instances as follows:</p> <ol style="list-style-type: none"> <li>In expanding a settlement area or in creating a new settlement area, and</li> <li>In re-designating employment lands to a non-employment use.</li> </ol> <p>The <a href="#">Places to Grow Act, 2005</a> enables the Province to develop regional growth plans that guide government investments and land use planning policies. The County of Grey is not part of the <a href="#">Provincial Growth Plan for the Greater Golden Horseshoe</a> or the <a href="#">Growth Plan for Northern Ontario</a>. As a result, Grey County does not have the same legislative requirements as some of our neighbouring counties such as Simcoe, Dufferin, and Wellington. A map has been included below showing the Greater Golden Horseshoe boundaries.</p> 	No further changes needed at this time.

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37	Lucy Richmond	<ul style="list-style-type: none"> <li>In the Town of the Blue Mountains, we have only one "Primary Settlement Area ", Thornbury/Clarksburg. There are two "Secondary Settlement Areas", Heathcote and Ravenna. The intent of the Provincial Policy Statement is to fill Primary and Secondary Settlement Areas before a Municipality seeks to expand an existing "Settlement Area" or create a new one. Developable lands in Thornbury/Clarksburg are not yet filled, but a water/wastewater plan has been completed for this area. That plan, for the installation of water and wastewater infrastructure, is awaiting funding. No other part of the service area boundaries in the Town are prepared for new development, or intensification under the guidelines of the Provincial Policy Statement.</li> <li>Lora Bay, Camperdown and Craigleith are areas of settlement in the Town, not a "Settlement Area". An "area of settlement" simply acknowledges that people have settled there and will probably continue to settle there. A "Settlement Area", for municipal planning purposes, is to be registered under the "Places to Grow Act " to protect Municipalities which, in their eagerness to grow, risk bankrupting their Councils and Ratepayers by having to incur unsupportable long-term debt, for new or failing infrastructure, at a rate that is out of balance with what the municipality and its ratepayers can afford. The Ontario Ministry of Infrastructure administers the "Places to Grow Act".</li> <li>Furthermore, the "Places to Grow Act" allows the naming of new Settlement Areas or expansion of an existing Settlement Area only after a "comprehensive review" of the area to be designated has been completed and a proposed "growth plan" has been submitted to, and approved by, the Minister of Infrastructure as required in the Act. These constraints apply to all Municipalities and are to be observed when a Municipality, upper or lower tier, wishes to expand an existing Settlement Area, or, to name a New Settlement Area.</li> </ul>	<p>As per the response to comment # 33 above, the Town has significantly more settlement areas than just the Primary and Secondary Settlement Areas. Lora Bay, Camperdown, Castle Glen, and Craigleith are all designated as Recreational Resort Area (to be renamed Recreational Resort Settlement Area), which is a defined settlement area in the County Official Plan. Although the County Plan does not currently set any minimum required densities or intensification targets for the Recreational Resort Area, these lands are still designated settlement areas. The Province approved the County Official Plan in 2019, concurring with the County that the areas listed above are indeed designated settlement areas as defined by the County Official Plan and the Provincial Policy Statement. The Town of The Blue Mountains plans for and provides servicing and infrastructure needs in the Recreational Resort Area, just as they do in the Primary Settlement Area on Thornbury.</p> <p>See comment # 36 with respect to comments on the Growth Plan and the <a href="#">Places to Grow Act, 2005</a>. With Grey County not being located in a Provincial Growth, settlement area expansions do not require the approval of the Minister of Infrastructure. Most settlement area expansions do however still require the completion of a comprehensive review as noted in the response to comment # 36 above.</p>	No further changes needed at this time.

Comment #	Commentor	Comment Summary	County Staff Response	Policy or Mapping Changes Recommended
38	Lucy Richmond	<ul style="list-style-type: none"> <li>Year 2019 - Grey County Official Plan is Approved It is in this document that the County designated a NEW "Settlement Area" in the Town of the Blue Mountains, which is the lightly inhabited area of the Town that runs between the Escarpment and the Bay. The Town's Land Use for this area is called "Residential Recreational" in the Town's current Official Plan. (The County Official Plan calls these lands, Residential Resort.)</li> <li>If the Recreational Residential Land Use of the Town has been legitimately re-designated by the County to "Settlement Area" under the "Places to Grow Act", growth will no longer be limited to a maximum density of 10 units per Hectare, plus 40% Open Space as written in the Town's current Official Plan. When the plan is reviewed and updated, the new density limit will automatically be, 20 units per hectare, minimum, as it is for every other Settlement Area designated in Ontario under the Act. Furthermore, the Province directs intensification to "Settlement Areas": no upper limit is stated.</li> </ul>	<p>Recolour Grey, the new County Official Plan, was approved by the Province in 2019. However, the Recreational Resort Area settlement area was first approved in the former County Official Plan that pre-dated Recolour Grey. More specifically the Recreational Resort Area was approved through County Official Plan Amendment # 80, as approved by the Province in 2011 and later approved by the Ontario Municipal Board in 2012.</p> <p>The Recreational Resort Area was and is a settlement area prior to 2019 and prior to the current proposed County Official Plan Amendment # 11. The County Official Plan does not currently prescribe density and intensification targets for Recreational Resort Areas, and instead defers to municipal official plans, such as the Town Official Plan. County Official Plan Amendment # 11 is not proposing to amend the density or intensification targets for the Recreational Resort Area.</p>	No further changes needed at this time.
39	Lucy Richmond	<ul style="list-style-type: none"> <li>Concerning "approval of plans of subdivision, and condominium", forge an agreement between the County and the Town of the Blue Mountains that would ascribe to the Town, the Lower-Tier Municipality, the authority, responsibility, and accountability for approval of plans of subdivision and condominium as permitted in the Planning Act, Section 51, Subsections (5) and (6).</li> <li>Concerning municipal "spheres of jurisdiction", forge an inter-municipal agreement between the Upper-Tier Municipality (County) and the Lower-Tier Municipality (Town) specifying, each to the other, in binding documents, which legislative body has the authority to manage each sphere of jurisdiction and the attendant responsibility and accountability as prescribed in PART II, Section 11 of the Municipal Act. There are 11 spheres of jurisdiction to consider: the Chart could be useful.</li> </ul>	<p>These matters are generally not part of County Official Plan Amendment # 11, but a response to each one has been provided below:</p> <ul style="list-style-type: none"> <li>A report was recently supported by County Council to set up a framework for the delegation of approvals of plans of subdivision/condominium. A copy of that report can be found <a href="#">here</a>. At the time of preparing this response matrix, the County was awaiting any delegation requests from member municipalities.</li> <li>Spheres of jurisdiction are generally set out in legislation and through agreements between the upper and lower tiers municipal governments.</li> </ul>	No further changes needed at this time.

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40	Lucy Richmond	<ul style="list-style-type: none"> <li>The further Amendment (suggested wording highlighted in italics, below) would simply be attached to existing wording on page 2 of the County Official Plan, at the end of the excerpt below: . . . "Recreational Resort Area – applies to areas within The Blue Mountains and the Municipality of Grey Highlands which exhibit a mix of seasonal and permanent residential and recreational growth on full municipal services. While this development is fully serviced, it does not contain the same range of uses as a traditional urban centre or Primary Settlement Area and is focused on a recreational component as its basis for development. <i>Subject to ratification of the County's designation of a new or expanded "Settlement Areas" by the Minister of Infrastructure under the Places to Grow Act, the limits of development for these lands, as documented in the Lower-Tier Municipality's Official Plan, shall prevail.</i>" This measure will put all issues regarding Lower-Tier Land Use firmly back into the hands of the Lower Tier Municipality.</li> </ul>	<p>County staff cannot support this proposed change. The County is not in the Growth Plan and settlement area expansions in Grey County do not require the approval of the Minister of Infrastructure. Furthermore, the County Plan provides general policy guidance in the Recreational Resort Area, while primarily deferring to municipal official plans and/or the Niagara Escarpment Plan. Having a lower-tier plan 'prevail' over an upper tier plan is not how planning is done in Ontario. That said, a lower tier plan can be more detailed than an upper tier plan and provide community-specific policy direction not covered by the upper-tier plan. This is how the County and Town Official Plans currently function i.e. the Town Plan is much more detailed than the County Plan, but the County Plan still provides general policies that the Town Plan must conform to.</p>	<p>No further changes needed at this time.</p>

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41	Blue Mountains Resorts LP	<p>Employees, whether part time or full time, shall have the opportunity to access affordable and livable employee housing.</p> <p><b>General Policy Direction/Goal:</b></p> <ol style="list-style-type: none"> <li>1. Employee housing will be a permitted use in land use designations that are in proximity to major employment uses and centers.</li> <li>2. By-laws and development agreements will be used to ensure occupancy and use is for employee housing.</li> </ol> <p><b>Definition:</b> Employee Housing means housing intended for employees that is affordable and attainable relative to their household size and income and, restricted to employee occupancy. Employee housing may be subject to eligibility, occupancy, rent, term or other restrictions.</p> <p><b>Additional Implementation Comments:</b></p> <ol style="list-style-type: none"> <li>1. Amend Development Charges By-law provisions to include purpose-built employee housing as a development type eligible for rebate or forgiveness, similar to current provisions provided for purposed built rental housing.</li> <li>2. Amend Zoning By-law to include a definition for employee housing.</li> <li>3. Employee housing shall be an additional defined and permitted use, distinct from residential dwelling types.</li> </ol>	<p>Staff support the intent of the Blue Mountain Resort comments. Changes are being recommended to the Resort Recreation, Primary Settlement Area, Housing, and Definitions sections of the Plan to implement some of these suggestions.</p>	<p>Modifications 36 and 111 have been adjusted (#36) and added (#111) to address these comments.</p>
42	Anna Dekleva	<p>Shared a story of trying to build a smaller home in Grey County, where one would have to go through a minor variance process (cost of \$1500) plus \$5000 deposit costs. Suggested this is another barrier for folks trying to create smaller and more affordable homes. Suggested that the County alter OP wording such that municipalities “shall” eliminate minimum gross-floor area for new homes, rather than the current proposed wording to “encourage” municipalities to do so.</p>	<p>This is an important example of why municipalities should defer to the Ontario Building Code in their zoning by-laws for minimum gross floor areas of any new homes. Many municipalities are relying on outdated zoning by-laws, and while many municipal planning staff recognize that there are policies that need to be updated to align with progressive land-use planning, there is not always capacity to regularly make those updates. As County staff provide comments on all proposed housekeeping and fulsome zoning by-law revisions, this is an item that County staff will be sure to highlight when the opportunity arises.</p>	<p>A new definition of tiny home (generally with a minimum ground floor area of 17.5 m<sup>2</sup> per OBC) has been added to modification # 36.</p>