

Date: May 2, 2025  
To: Mark Kluge, Manager of Planning, Town of Grand Valley  
From: Marilyn Cameron, Planner; Alison Bucking, Planner; & David Welwood, Senior Planner, J. L. Richards & Associates  
CC:  
Subject: Grand Valley Official Plan and Zoning By-law Update  
JLR No.: 32657

J. L. Richards & Associates Ltd. (JLR) is pleased to be working with the Town of Grand Valley to provide services related to the statutory Official Plan (OP) and Zoning By-law (ZBL) review and update. The updated draft OP and ZBL have been prepared for Council review at the May 13, 2025 meeting of Council.

Enclosed in this memorandum is a summary of changes made to the proposed OP and ZBL since the previous draft copies were presented at the Statutory Open House, October 29, 2024.

## **Background**

The Town of Grand Valley's current OP was adopted by Council in 2006 and approved by the County of Dufferin in 2009. The Current ZBL 2009-10, as amended, took effect on February 10, 2009. Both documents have since undergone numerous site specific and housekeeping amendments. In addition, since the previous documents took effect, the Province has introduced numerous changes to the Planning Act and released the Provincial Planning Statement, 2024, which replaces the previous Provincial Policy Statement 2020 and repeals A Place to Grow: Growth Plan for the Greater Golden Horseshoe.

Dufferin County has also recently undertaken a phased municipal comprehensive review (MCR) of the Dufferin County Official Plan (DCOP). The County has adopted three related DCOP amendments to date, two of which (OPA 2 and 3) were approved by the Ministry of Municipal Affairs and Housing (MMAH) on October 9, 2024. The third DCOP amendment (OPA 4) adopted by Dufferin County on March 14, 2024 and is awaiting MMAH approval. Under Section 26 (9) and 27(1) of the *Planning Act*, lower tier municipalities are required to review and update their OPs and ZBL to ensure conformity with upper-tier municipal and provincial policies. As such, the Town initiated the comprehensive review and update of the OP and ZBL.

In late 2023 the Town retained JLR to carry out the review and update to both planning documents. In addition to review of policy, legislation, and technical review of the existing OP and ZBL, JLR and the Town carried out multiple public and stakeholder engagement activities. These included:

- Two council meetings;
- Two online surveys;
- One focus group with the agricultural community;
- One focus group with the development and business community;
- One statutory public open house; and,
- the Statutory public meeting, expected May 13, 2025.

In addition, input was solicited and draft copies of the OP and ZBL were provided to agency stakeholders and Indigenous Communities to ensure their interests were represented. This included comments received from Grand River

Conservation Authority, Infrastructure Ontario, the Ministry of Transportation, Wellington Dufferin Guelph Public Health, and Bell Canada. In addition, meetings were held to discuss the interests and comments of the Six Nations of the Grand River and the Haudenosaunee Development Institute. At time of writing, expected returned comments from the Haudenosaunee Development Institute are still outstanding.

JLR presented an initial Background Report and presentation to Council on May 28, 2024.<sup>1</sup> JLR presented a first draft of the OP and ZBL to the public at the Statutory Public Meeting on October 29, 2024. This draft was shared with the public and circulated to agencies per the requirements of Section 17(17) of the *Planning Act*, R.S.O. 1990. This memorandum summarizes the major changes which have been made since that Open House to the revised drafts, and includes comments received by the public and stakeholders in Attachment 1.

### **Revised Official Plan and Zoning By-law**

Since the Open House on October 29<sup>th</sup>, 2024, public and stakeholder comments have been received and revisions have been made to both documents. A full list of comments received as of April 7, 2025, and how they have been addressed through revisions has been documented in the Summary of Public Comments To Date in Attachment 1.

In addition to the specific revisions noted in the Public Comment Matrix, the following updates were also made to the draft documents:

1. Dufferin County's Municipal Comprehensive Review, Lands Needs Analysis, and DCOPA#2, resulted in updated population projections and settlement area boundary changes for Grand Valley. To conform with the DCOP, the Grand Valley OP and ZBL were updated to reflect the change in settlement boundary. Within the OP, certain areas added to the settlement area were designated as Site Specific Policy Areas. The purpose of these Site Specific Policy Areas is to ensure that proponents of development demonstrate that the lands will be planned comprehensively, include an appropriate mix of uses, and to require that master servicing plans be completed prior to any development.

To implement this similarly within the ZBL, lands which have been added to the settlement area have been zoned "Development" (D) to ensure allow for the comprehensive planning of future neighbourhoods.

2. Through approval of DCOPA 3, Dufferin County's Schedules E (Natural Heritage Features) and E1 (Natural Heritage System) were updated. Further discussion with the County during late 2024 initiated an update to the County's digital mapping corresponding to these schedules. Schedules B and B1 of the Grand Valley OP and Schedule A2 of the ZBL were revised to conform to updated DCOP mapping.

Within the Grand Valley OP, Natural Heritage Features and the DCOP Natural Heritage System maintain distinct policies, in conformity with the DCOP and consistency with the PPS 2024. Draft ZBL Schedule A2 has also been updated to implement the County's Natural Heritage System through an overlay, rather than adding the entire extent of the Natural Heritage System as part of the Environmental Protection Zone, which allows for more flexibility in implementing the distinct policies of the Grand Valley OP.

3. Comments from Council and staff at and following the Open House indicated that the proposed amendments to the parking space requirements of the ZBL were too restrictive for the type and size of common local vehicles. The requirements of parking space sizes within ZBL Section 4.1 were updated to ensure local vehicles could be accommodated.
4. Comments received at the Open House and through online survey indicated that the legibility of the draft schedules could be improved. All OP and ZBL schedules were revised with clearer fonts and labeling.

Additional comments have and will continue to be received by the Town until the statutory public meeting. Following May 13, 2025, the OP and ZBL will be revised as directed by Council and will incorporate any further comments received. An

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<sup>1</sup> An amended background report, reflecting changes to provincial policy as a result of the release of the 2024 Provincial Planning Statement and approval of County OPAs 2 and 3, and summarizing corresponding recommended changes included in the OP and ZBL, has been prepared for presentation at the present Council meeting and is not summarized within this memo.

updated Summary of Comments to Date will be provided will be prepared along with the final OP and ZBL for Council's review and adoption.

**Conclusion**

The draft OP and ZBL presented to Council at the Statutory Public Meeting includes revisions as outlined within this memorandum.

Sincerely,

Marilyn Cameron, RPP MCIP Planner	Alison Bucking, RPP MCIP Planner	David Welwood, RPP MCIP Senior Planner

J.L. RICHARDS & ASSOCIATES LIMITED

Attachments:

1. Grand Valley OPZBL - Summary of Public & Stakeholder Comments, dated April 7, 2025.

The following is a summary record of written and verbal public submissions received during the process for the Town of Grand Valley Official Plan and Zoning By-Law update. Comments have been summarized here. The rightmost column provides the recommended response or revision to the documents as a result of the comments received.

**Table 1: Public Comments received to date (note some responses have been abbreviated)**

No	Date	Author/Org	Comments	JLR Recommendation/ Response
1	July 30, 2024	Dufferin Federation of Agriculture	<p>The Dufferin Federation of Agriculture (DFA) proudly represents more than 575 farm family members across the County of Dufferin, supporting our members and the agri-food industry on issues, legislation and regulations managed by all levels of government and works in concert with the Ontario Federation of Agriculture (OFA). DFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impact the sustainability of our farm businesses.</p> <p><b>Losing Farmland in Dufferin County to Build More Homes - Why it Matters</b>            Only 0.5% of Canada's total land base comprises Class 1 land (which is the highest quality in soil classification), and most of this soil is in southern Ontario (Walton, 2003; Caldwell et al., 2017).</p> <p>Soil is a non-renewable resource, and Dufferin County is one of few areas in Canada with an abundant reserve of the highest-quality soils for growing food. Farmland in Dufferin County is made up of some of the most productive soils in Canada. It must not be understated though, all classes of Agricultural land here in Dufferin County deserve the same stringent protection, as lower classes are very important in the livestock sector, and this sector helps to build soil health through application of manure either by grazing, or by spreading onto the land.</p> <p>The recently released report from the Standing Senate Committee on Agriculture and Forestry - <i>CRITICAL GROUND: Why Soil is Essential to Canada's Economic, Environmental, Human, and Social Health</i> highlighted that</p>	<p>Thank you for your comments. In the draft Official Plan, we have increased the minimum density target from 32 residents and jobs per hectare to 44 residents and jobs per hectare to promote more compact growth. In the policies, development which exceeds these densities is encouraged. Two additional residential units are permitted on residential and rural residential lots containing single detached, semi detached or townhouse units town-wide, subject to criteria and are a form of gentle density.</p> <p>As it relates to housing affordability, the Official Plan contains updated policies to encourage supportive housing, including prioritizing projects which receive government funding and expediting the approvals process. Shared housing is permitted as of right in residential neighbourhoods subject to reasonable planning standards and servicing. Senior's housing is a form of supportive housing and is encouraged.</p> <p>All agricultural lands within the Town of Grand Valley are Prime Agricultural lands and as such the policies do not permit residential lot severances, save for the purposes of a surplus farm dwelling severance. Recreational uses are not permitted on Prime Agricultural lands, save for where they are captured as an on-farm diversified uses, subject to the OMAFRA guidelines.</p> <p>Policies in the Official Plan have been updated as it relates to surplus farm dwelling severances. Policy language has been included to state that the lots created for surplus farm dwellings should be limited to the minimum size needed to accommodate the use.</p>

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			<p>there are more living organisms in a tablespoon of soil than there are people on Earth. One cubic metre of healthy soil can retain over 250 litres of water. Ninety-five percent of our food comes from soils, yet the Food and Agriculture Organization of the United Nations estimates that 33% of the earth's soils are already degraded and over 90% could become degraded by 2050 (Food and Agriculture Organization of the United Nations, <u>Global Svmgosium on Soil Erosion</u>, 2019.)</p> <p>The report recommends that “Soil is a valuable natural resource. The Government of Canada should designate <i>soil as a strategic national asset</i>. Other countries such as Australia have appointed a national <i>soils advocate</i>, the committee believes that the Government of Canada should do the same.”</p> <p>With the population in Dufferin County expected to grow substantially to meet the needs of new residents by 2051, pressure has been placed on the lands in rural areas to become home for more new homes. Without studious planning, the future of the farms and farm practices in Dufferin County can be negatively affected. It is recognized that intensification is the most effective way to preserve farmland. The housing practice of “growing up, now out” can provide housing options at an attainable price for new homeowners and those looking to downsize. Concentrating the “people” within an urban center is the most cost-effective way for municipalities to provide services such as water/wastewater, recreation, roads, and transportation systems. As a simple example, a 4-story apartment building with 10 units/floor - based on ½ acre building lots - will save 20 acres of our productive farmland in Dufferin County.</p> <p>Often lost in the review of agricultural-related policies is that much of the impact on agricultural lands and operations is directly tied to the nature of the growth management policies adopted by a municipality. It is</p>	<p>Within the Zoning By-law, the Agriculture Zone has been updated to include provisions for both farm and non-farm lots. The introduction of provisions for non-farm lots is intended to establish further regulations for surplus farm dwelling severed lots and existing undersized lots within areas of prime agriculture. Non-farm lots are categorized by their size, which is any lot less than 4 hectares, and have permissions limited to residential and accessory uses. Non-farm lots also have reduced permissions for minimum lot area, lot frontage, and yard setbacks in comparison to farm lots. A minimum lot area of 0.4 ha has been established, and in the case of surplus farm dwelling severances, the maximum lot area will be limited as directed by the OP.</p> <p>For farm lots in the agricultural zone, the minimum lot area has been increased from 16 hectares to 40 hectares to prevent fragmentation of agricultural parcels. All existing lots of record and existing uses for both farm and non-farm lots will be grandfathered and permitted to continue.</p> <p>The Zoning By-law has also been updated to conform to OP changes reflecting a wider range of housing types, such as new types of townhouses and additional residential units. The Village Residential (RV) Zone and Multiple Residential (RM) Zone have now been merged and renamed the Urban Residential (UR) Zone, to allow for wider flexibility of permitted housing types across the settlement area.</p>

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			<p>critical that we understand the impact that higher intensification rates, designated greenfield area densities, promotion of accessory dwelling units and maximizing the use of existing infrastructure have on the need for settlement area expansions.</p> <p><b>Greenfield Densities</b>  Proposed densities (especially the density of 32 residents and jobs per hectare proposed in Grand Valley) would likely permit almost 100% of the greenfield development to be single detached units.</p> <ul style="list-style-type: none"> <li>• The lower densities proposed unnecessarily increase the area of urban expansions into the surrounding agricultural lands</li> <li>• Like all municipalities in Ontario, Dufferin County is suffering from a lack of affordable housing. It has been decades since single-detached units (or for that matter semidetached and most townhouse units) have met affordability guidelines.</li> </ul> <p>The need to provide a mix of housing in greenfield areas at affordable prices, combined with the mandated potential for development of up to three dwelling units on any fully serviced residential lots (as established through Bill 23), should realistically result in designated greenfield area densities of more than 50 residents and jobs per hectare.</p> <p>Additional population was requested for Grand Valley over and above that assigned to the County by the Growth Plan. This, combined with an extremely low greenfield density target for the Grand Valley settlement area has resulted in a proposed expansion in Grand Valley (175 ha net of mapped environmental constraints – up from 38 ha as provided for in the Land Needs Assessment) <b>that is almost 50 percent higher than the total urban settlement area expansions for residential purposes in the entire County justified through the Land Needs</b></p>	

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			<p><b>Assessment process</b> (118 ha net of mapped environmental constraints). This makes no sense, particularly given the incredibly low greenfield density target of 32 residents and jobs per hectare assigned to Grand Valley and should be revisited.</p> <p><b>Housing Affordability</b>            From a survey done about 30 days ago-Only four (2%) of the 224 single-detached, semi-detached and townhouse units currently for sale in Orangeville, Shelburne and Grand Valley as currently listed on Realtor.ca met the threshold price for affordability for 60% of the households in Dufferin County. All of these units were apartment condominium units.</p> <p>Only 20 (9% of all housing units for sale in Orangeville, Shelburne and Grand Valley) would have annual costs of less than 30% of pre-tax income for households making \$200,000 annually. As of the 2021 Census, only 14 percent of households in Dufferin County have incomes of over \$200,000 annually.</p> <p>Single-/semi-detached units in much of southern Ontario have likely not met affordability criteria for most households for over 20 years. More recently, the cost of townhouses has begun to exceed affordability standards as well. Today, affordability criteria can typically only be met in <b>apartment type units</b>. Building high percentages of low-density units will not help meet the policy objective of creating affordable housing for residents of Dufferin County, especially young people starting out, young families and seniors.</p> <p>Changes are required to the forms of housing being facilitated by the planning policies in the Adopted OP if housing affordability in Dufferin County is to be achieved.</p>	

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			<p>Essentially, at this point in time, almost nothing in Dufferin County is affordable to our Dufferin County residents and this should be a main concern.</p> <p><b>Accessory Dwelling Units (ADUs)</b>            These types of dwelling units represent a significant opportunity for providing a range of affordable housing options for seniors in the smaller communities throughout the County. ADUs typically remain as rental units, provide opportunities for multigenerational housing, help maximize utilization of existing services, and are usually developed by the existing homeowner with the result being elimination of some of the profit margin from the price of development thereby facilitating lower rental costs necessary to recover the investment. DFA strongly supports ADUs as a way to increase affordable housing and reduce sprawl.</p> <p><b>Seniors Housing</b>            As of the 2021 Census, Dufferin County <b>had 2,505 residents 80 years of age or over</b>. While many seniors will stay in the family home through the early years of their retirement, many for physical or financial reasons eventually choose to relocate to units typically more conducive to seniors living, often where additional services are available to support them in their later years.  <b>For late year retirees, these types of units are most often apartments. In 2021, Dufferin County had only 2,595 apartment units.</b></p> <p>By 2051, <b>an additional 22,390 existing residents of the County who were under 80 years of age in 2021 will have aged into the 80 plus category and/or will have passed</b>. The magnitude of what is commonly referred to as a Grey Tsunami that is starting to hit communities throughout North America, including Dufferin County, is staggering. Development of housing to accommodate late retirement seniors needs to</p>	

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			<p>be a priority. Construction of low-density housing far less so.</p> <p>The aging Baby Boom generation (including retiring farmers who will need to stay within this community) will drive a need for different quantities and forms of housing than have been experienced in Dufferin County in the past. Few smaller settlements contain capacity to accommodate aging seniors, meaning many existing residents will experience displacement from the communities they have been part of most of their lives. Although servicing capacity is an issue in these smaller settlement areas, the County needs to strongly advocate for, at minimum, the development of ADUs within these communities to accommodate its aging population.</p> <p>DFA recommends:</p> <ul style="list-style-type: none"> <li>• significantly increasing the intensification and greenfield density targets</li> <li>• actively promoting and facilitating development of ADUs throughout the full range of settlement areas</li> <li>• encouraging the recycling of homes containing considerable underutilized capacity, through the provision of housing attractive to seniors</li> <li>• providing for seniors housing throughout the full range of settlement areas to accommodate long term residents of such communities who may wish to live out their lives in familiar surroundings</li> <li>• increased due diligence around surplus dwelling severances. The residential lot size should be minimized to the smallest size to accommodate the well and septic, and any severances should be the result of a farm consolidation. Surplus dwelling severances were never instituted to create estate lots—which inevitably result in non farmers living in the surplus dwelling, thus resulting in increased conflict.</li> <li>• elimination of permission for residential severances within rural areas of the County</li> </ul>	

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			<ul style="list-style-type: none"> <li>• elimination of permission for new recreational uses in Prime Agricultural Areas</li> </ul>	
2	October 28, 2024	Thomasfield Homes Limited	<p>Thomasfield has reviewed the draft Official Plan 2024, and would like to provide a number of comments on the draft OP. Kindly find them outlined below.</p> <p><u>Section 3.3(d) "Objectives" Page 4:</u></p> <ul style="list-style-type: none"> <li>• What is a "sustainable food system"? What does it mean and how is it defined?</li> <li>• Suggest changing the wording to match Provincial direction of "local contribution to the greater Agricultural System" which is a defined term in the PPS</li> <li>• Or, remove because Section 5.2.3 "agriculture", of the draft OP provides sufficient guidance on agriculture for the area?</li> </ul> <p><u>Section 4.3.1.3(d) Page 28:</u></p> <ul style="list-style-type: none"> <li>• -This section references "urban design standards". Is the intent that the Town will develop urban design standards? Or is the intent that any urban design standards are limited to public spaces?</li> <li>• Should the suggested wording be changed to "best practices"?</li> <li>• It is our opinion that urban design standards are not necessary for Grand Valley and would caution against implementing them for a variety of reasons as they can make Towns less dynamic and discourage architectural variety that often lead to new, vibrant and sustainable urban environments</li> </ul> <p><u>Section 4.3.2(f) "Development Policies" Page 29:</u></p> <ul style="list-style-type: none"> <li>• "Land use patterns shall promote energy efficiency" — what does this mean? How is this measured? We would suggest this sentence be removed</li> </ul> <p><u>Section 5.5(2) "Sustainability" Page 62:</u></p>	<p>We are pleased to provide the following responses:</p> <ul style="list-style-type: none"> <li>• Section 3.3 d): revised to reference the overarching agricultural system.</li> <li>• Section 4.3.1.3(d): This is text from the existing Official Plan, we concur that using the term best practices continues to achieve the intent of the policy and has been revised accordingly.</li> <li>• Section 4.3.2 (f): This is text from the existing Official Plan. This relates optimizing infrastructure and public service facilities. We have proposed revised wording for this policy which improves clarity and relates back to the PPS.</li> <li>• Section 5.5(2): This policy has been revised to reference the fact that the County may develop Green Development Standards which may require implementation at the Town level.</li> <li>• Section 6.13: We have reviewed your comments and have revised the policy approach for this area. In the updated draft Official Plan, the new urban expansion lands are designated urban residential but are subject to a site specific policy area. This site-specific policy area requires that the master servicing plan update be complete prior to development. It also requires the creation of a master plan/area design plan for the 3 parcels west of Beam Street to ensure that land uses and the road network are coordinated.</li> <li>• General comments: spelling mistakes have been corrected.</li> </ul>

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			<ul style="list-style-type: none"> <li>• You may be aware that the County of Dufferin is participating in the Tri-County Green Development Standards project, which is a joint project between Grey, Dufferin and Wellington Counties to create a Green Development Standard (GDS). Given this effort at the County level, we would not recommend that Grand Valley duplicate efforts. Furthermore, Thomasfield together with the Ontario Homebuilders Association, local HBAs and the industry in general, is not alone in voicing the concern that Green Development Standards pose a serious risk to affordability, with questionable payback both economically and environmentally. Green Development Standards would significantly increase costs while duplicating measures already enforced by the Ontario Building Code. Section 5.5(2) should be removed from the Town's Official Plan.</li> <li>• Policies 1 (a)-(o) provide enough guidance to encourage sustainable developed options</li> </ul> <p><u>Section 6.13 "Grand Valley East and West Study Area"</u> <u>Page 95:</u></p> <ul style="list-style-type: none"> <li>• Thomasfield has concerns whether the need for the proposed "East" and "West" study areas is warranted. The draft Official Plan notes these two areas represent approximately 181.5 hectares of land, and in our experience, Secondary Plans typically encompass much larger areas of land, with multiple landowners. For context, secondary plans in other municipalities that Thomasfield has been involved in have ranged from approximately 400+ to 600+ hectares</li> <li>• In the case of the "West" study area, the landowners are Thomasfield Homes, the United People Corporation and The Town of Grand Valley (being the new park site, which has</li> </ul>	

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			<p>already undergone a park programming process), and a 2 acre parcel along Amaranth Street.</p> <ul style="list-style-type: none"> <li>• The majority of the lands within the East Study area are owned by Thomasfield, and are known as the "Gravel Pit" lands. We estimate approximately 90% of the "East" study area to be under Thomasfield ownership.</li> <li>• Over the years, Thomasfield has worked with the Town to advance a vision for the former Gravel Pit lands which have the potential to become a truly unique, master planned development and recreational asset for Grand Valley with its series of ponds, natural features, future trails and parks, in addition to the potential for a practical flood control component (subject to further study).</li> <li>• Within the West Study area, Thomasfield owns lands that comprise Phase 4 Mayberry Hill (approx. 32 ha). Thomasfield has already carefully considered how the Phase 4 lands would integrate with the current Mayberry Hill phases including a future park, together with a linear north-south trail system to integrate the community and provide connectivity to the new Municipal Park (baseball diamonds) on Amaranth Street West</li> <li>• We recognize the need for Grand Valley to undertake an update to the Master Servicing Plan in order to provide and ensure adequate services for future development within the community. We understand that the update to the Master Servicing Plan was on hold pending the results and completion of the Dufferin County MCR. The removal of the "East" and "West" study area labels would not fetter this process, nor would any development be able to</li> </ul>	

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			<p>proceed in the absence of the Master Servicing Plan update.</p> <ul style="list-style-type: none"> <li>• It is unclear whether a secondary plan is proposed to be completed for each the "East" and the "West" areas. Again, this divides the two areas into relatively small secondary plan study areas, with the majority of land ownership held by a couple of landowners.</li> <li>• Thomasfield would like to request clarification on the 181.5 hectares of land referenced in the draft Official Plan, and whether this area includes the "Environmental Protection Areas"? And further, how the 181.5 hectares is divided between both the "East" and "West" areas.</li> <li>• It is our opinion that this is an unnecessary designation for these lands and represents an additional unnecessary planning process that the Town will need to navigate and hampers the ability to expeditiously provide much needed housing within Ontario. We would respectfully suggest that references to secondary plans be removed from the draft Official Plan.</li> <li>• Thomasfield believes that the Official Plan objectives of creating complete communities can be accomplished through the Draft Plan process, implementing Official Plan amendments and Zoning By-law amendments, as supported by the necessary Servicing Master Plan updates, Transportation Master Plan updates, etc. rather than a secondary plan process.</li> </ul> <p>General comments:            - Check spelling "internsification" throughout</p>	
3	October 29, 2024	Roy Sheardown	I am the owner of Concession 1 N PT LOT 28 113117 27/28 SR EAST LUTHER	Thank you for your letter. We have received your request and it will be included with public comments on the draft when they are shared with Town Council. To clarify, the event on October 29 <sup>th</sup> was to review a draft Official Plan

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			<p>I wish to have my lands located in Grand Valley included immediately in any review and consideration for residential development in Dufferin County's Official Plan Review.</p> <p>Please include this request in the October 29 2024 public meeting and any discussion from here on out. Please inform if there are any earlier meetings either public or not and include my request.</p> <p>Please acknowledge that you have received this communication.</p>	<p>and Zoning By-law for the Town of Grand Valley, and not that of the County of Dufferin.</p> <p>We've identified the property you described as designated Agriculture in the Official Plan and Zoned Agriculture in the current Zoning By-law. Under the current Official Plan and Zoning By-law, one farm dwelling and up to two additional residential units are permitted on the property. No further residential development is currently permitted.</p> <p>The property is also located outside of the settlement boundary, which is where the focus of residential growth is intended to occur in the Town. Under the current Official Plan, lands outside of the Town's settlement area are considered to be prime agriculture and are to be protected to maintain long-term agricultural and related uses. The designation and Zoning of your property are not proposed to change within the draft updated Official Plan and Zoning By-law.</p> <p>Official Plans are required to be consistent with the 2024 Provincial Policy Statement (PPS) and the County Official Plan. As you might be aware, the County very recently underwent a Municipal Comprehensive Review to amend the County Official Plan with revised settlement boundaries. These amendments were approved by the Province on October 9, 2024 and are now in effect. The approved settlement area boundary does not include your property. It is unlikely that the County will have rationale to initiate another review of the Town's settlement boundaries in the near future.</p> <p>The 2024 PPS Section 2.3.2. requires that to include new lands within a settlement boundary many factors must be considered, including those which minimize the reduction of prime agricultural areas, avoid any conflicts between adjacent agricultural and non-agricultural uses, and demonstrate infrastructure and servicing availability. Should you wish to have your lands considered within a future boundary expansion, you would be required to</p>

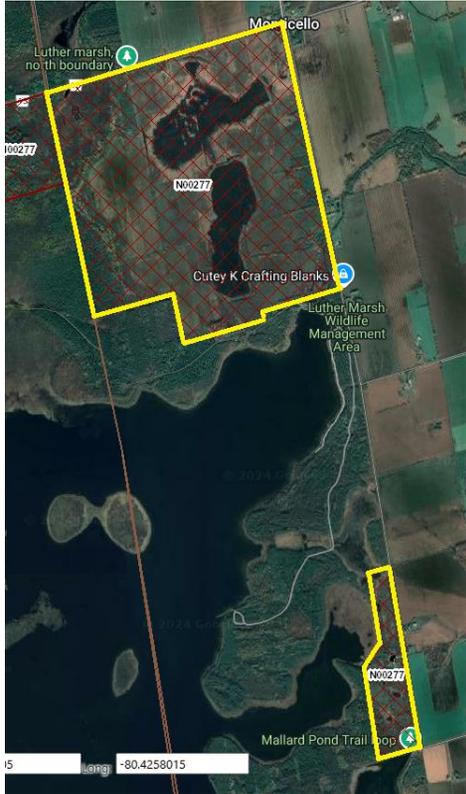
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				<p>submit to the Town and County sufficient justification in accordance with the PPS, as well as applications to amend both the County and Town Official Plans.</p>
4	November 20, 2024	Murray and Heather Ritchie	<p>As this site specific policy area 8 includes our vacant lot we are objecting to this official plan change.</p> <p>With the creation of a land consolidation to promote future development would limit the sale ability of our lot as these noted lands are owned by six different owners.</p> <p>A sale would be very limited and may take years or decades to get a developer who would want to tear down existing houses in order to create your idea of a future development. Our lot is empty and one other with a house between them. The other four lots have houses being lived in.</p> <p>With land consolidation I do not see the minimization of traffic flow along Amaranth Street West but actually reverse because with encouraging more intense development you will also increase the amount of traffic because of the increase density population in this area.</p> <p>Land assembly can have its draw backs as ALL landowners have to be on board. If one home owner is holding out it could have the potential to have an interested developer move on.</p> <p>Would it not be easier to incorporate this type of new development within a new sub divisions, as new owners would be aware of this type of development when purchasing their new home.</p> <p>By changing existing land use around an already new housing development will get opposition as these home owners would be assuming residential housing similar to the surrounding area when they purchased their homes.</p>	<p>Thank you for your letter.</p> <p>Site Specific Policy Area currently states “<i>In order to minimize the disruption of traffic flow along Amaranth Street, and to promote the creation of a complete community, land consolidation will be promoted in order to encourage future redevelopment. Land assembly will be used to promote a more consistent streetscape built form with surrounding residential developments.</i>”</p> <p>Nothing in the above policy prevents landowners from developing a vacant lot or selling their property. The policy represents the Town’s direction to promote lot consolidation and the consolidation of driveway accesses to improve traffic flow and safety by limiting the number of individual driveway accesses.</p> <p>The purpose of the Zoning By-law is to implement Official Plan policy. Upon consideration of the above policy and the comments within your letter, the Zoning By-law schedules have been updated to zone all parcels within OP SPA Policy Area 8 from Rural Residential (RR) Zone to Urban Residential (UR) Zone with a site specific policy which prohibits individual driveway access to the street and low density residential built forms.</p>

No	Date	Author/Org	Comments	JLR Recommendation/ Response
			<p>We are asking at this time that you consider our concerns and designate these lots urban residential as per the surrounding area.</p>	
5	November 25, 2024	Gladki Planning Associates	<p>We appreciate the opportunity to review and provide comments on the Draft Official Plan and Zoning By-law materials presented at the Open House on October 29, 2024, at the Grand Valley &amp; District Community Centre.</p> <p>At this stage, our comments primarily address the Draft Official Plan. While we have begun to review the Draft Zoning By-law, we reserve the opportunity to provide additional feedback on its details as our review progresses.</p> <p>Overall, we are pleased with the direction of the Official Plan and Zoning By-law updates and commend the Town’s effort in preparing this comprehensive planning framework.</p> <p><b>Comments on the Grand Valley West Study Area RECOMMENDED LAND USE DESIGNATION</b></p> <p>The subject lands, identified as part of the ‘Grand Valley West Study Area,’ should be designated as ‘Urban Residential’ through this Official Plan update process. The timely and orderly development of the lands is appropriately achieved through the designation of the subject lands and surrounding lands at this time. The Urban Residential designation included within the Draft Official Plan allows for:</p> <ul style="list-style-type: none"> <li>• A range of residential development types – including additional residential units, trails, parks, assisted and supportive housing, and small-scale retail.</li> <li>• The encouragement of a diverse mix of housing typologies within this designation and across the Town.</li> </ul>	<p>Thank you for your comments. We have taken your comments into consideration and have revised the policy approach for the Grand Valley East and West Study Area. We have removed the requirement for a secondary plan and these lands are now designated Urban Residential and are subject to a site specific policy area. The site specific policy area requires the completion of the master servicing plan update prior to development in this area. Further, it requires the creation of a master plan/area design plan for the 3 parcels west of Beam Street to ensure that land uses and the road network are coordinated.</p> <p>We have corrected errors to the mapping on Schedule A1, B1 and B2.</p> <p>We have adjusted the lot creation policy to refer to “sufficient reserve water and wastewater servicing”. In regards to development phasing, it is the preference to continue to prioritize infill and redevelopment opportunities within the built-up area. While the PPS 2024 no longer refers to the built-up area, it also does not permit the utilization of this terminology.</p> <p>At time of writing, no further comments specific to the Draft Zoning By-law have been received.</p>

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			<p>The draft policies also establish a framework for developing greenfield areas beyond the built-up area, emphasizing:</p> <ul style="list-style-type: none"> <li>• The creation of complete communities;</li> <li>• The provision of parks and trails; and,</li> <li>• Achievement of a minimum density target across designated greenfield areas.</li> </ul> <p><b>NO NEED FOR A SECONDARY PLAN</b></p> <p>The Grand Valley West Study Area comprises three parcels of land under the ownership of the Town and two private landowners. A secondary plan, which would typically be required to coordinate development among many landowners across larger or fragmented parcels, is not necessary in this case.</p> <p>We recommend in addition to the 'Urban Residential' designation, introducing an area specific policy that applies to the west expansion area to establish the location of transportation and servicing infrastructure required to support the orderly development of all lands in the study area.</p> <p>As matters of land use are reasonably addressed through the designation, such a policy would:</p> <ul style="list-style-type: none"> <li>• Coordinate infrastructure requirements;</li> <li>• Require the submission and review of a concept master plan including the location of a comprehensive road network supporting and demonstrating a comprehensive approach to servicing the entirety of the lands included within the policy area;</li> <li>• Require the submission and approval of a draft plan of subdivision for any development applications contemplating residential and non-agricultural uses over these lands.</li> </ul> <p>This approach will:</p>	

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			<ul style="list-style-type: none"> <li>• Provide clarity on infrastructure requirements and coordinate these requirements with an updated Master Servicing Plan;</li> <li>• Ensure coordinated and timely development;</li> <li>• Adequately address required servicing and transportation needs;</li> <li>• Provide a mechanism to facilitate cost-sharing as needed;</li> <li>• Allow the Town and landowners to enter into agreements regarding the provision of required services and amenities; and,</li> <li>• Streamline the planning process without the complexity or extended timelines of a secondary plan.</li> </ul> <p><b>Infrastructure and Servicing</b> Final, detailed studies can occur at subsequent stages of development, such as:</p> <ul style="list-style-type: none"> <li>• Subdivision approval;</li> <li>• Condominium approval;</li> <li>• Site plan approval.</li> </ul> <p>This ensures assessments are completed as needed and in a timely manner, supporting efficient development.</p> <p><b>Comments on Official Plan Schedules</b></p> <table border="1" data-bbox="585 1143 1169 1416"> <thead> <tr> <th>Schedule</th> <th>Comment</th> </tr> </thead> <tbody> <tr> <td>Schedule A1 – Land Use</td> <td>Schedule A1 incorrectly identifies the subject lands as prime agricultural and outside of the map inset for Schedule A2</td> </tr> <tr> <td>Schedule B1 – Natural Heritage</td> <td>Schedule B1 does not identify the subject lands as within the map inset area for Schedule B2</td> </tr> <tr> <td>Schedule B2 – Natural Heritage</td> <td>Schedule B2 identifies Natural Heritage Features on the subject property. This appears to be based on the Grand River Conservation Authority’s regulated area mapping however the GRCA mapping identifies only floodplain area along the Boyne Creek.  What is the basis for designating the Boyne Creek lands as Natural Heritage Features?</td> </tr> </tbody> </table> <p><b>COMMENTS ON DRAFT POLICIES</b></p>	Schedule	Comment	Schedule A1 – Land Use	Schedule A1 incorrectly identifies the subject lands as prime agricultural and outside of the map inset for Schedule A2	Schedule B1 – Natural Heritage	Schedule B1 does not identify the subject lands as within the map inset area for Schedule B2	Schedule B2 – Natural Heritage	Schedule B2 identifies Natural Heritage Features on the subject property. This appears to be based on the Grand River Conservation Authority’s regulated area mapping however the GRCA mapping identifies only floodplain area along the Boyne Creek.  What is the basis for designating the Boyne Creek lands as Natural Heritage Features?	
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			<ul style="list-style-type: none"> <li>• <b>Draft Policy 5.7 (Development Phasing):</b> This policy prioritizes infill, intensification, and redevelopment over greenfield development. While these priorities are important, the Provincial Planning Statement (2024) does not prescribe this hierarchy. The policy should be revised to better coordinate development phasing with new lot creation policies, ensuring consistency and clarity. Orderly development should proceed where there is confirmation of sufficient reserve sewage and water system capacity, which includes planned capacity.</li> <li>• <b>Draft Policy 5.9 (Lot Creation):</b> This policy requires confirmation of sufficient water and wastewater capacity. To align with the Provincial Planning Statement (2024), the language should be clarified to specify reserve sewage and water system capacity, ensuring alignment with provincial standards and providing greater certainty for implementation.</li> </ul>	
	December 6, 2024	Infrastructure Ontario	<p>Infrastructure Ontario (“IO”) is a crown agency responsible for the strategic management of the provincial realty portfolio on behalf of the Ministry of Infrastructure (“MOI”). Part of IO’s mandate is to protect and optimize the value of the portfolio, while ensuring real estate decisions reflect public policy objectives. IO manages two properties in the Town of Grand Valley located near Luther Marsh (see figure below).</p> <p>Within the existing Official Plan (OP) and existing Zoning By-law (ZBL), both sites are largely designated/zoned for Agriculture purposes. Within the proposed OP and ZBL, these Agricultural designations/zones are proposed to be replaced by an Environmental Protection designations/zones. Can you please let us know why the Agriculture designations/zones were removed and what studies have been completed to support this change? I’ll note that the Dufferin County OP designations and natural heritage features match the existing OP and ZBL designations/zones.</p>	<p>Thank you for your comments. Schedule B1 has been updated to remove the Provincial Wildlife Area overlay. This overlay coincided with the parcel’s designation in the Crown Land Use Policy Atlas.</p> <p>We reviewed the County’s mapping provided to us and its online mapping and in conversation with the County, there was an error on its online mapping. This parcel is identified as part of the County’s NHS on Schedule E1 of the County Official Plan and the online mapping has been updated accordingly. This includes Provincial Plan Natural Heritage Systems and those mapped on Schedule E1.</p>

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			<p>Furthermore, on Schedule B1 of the proposed OP, the sites are identified as a “Provincial Wildlife Area”, however, there does not appear to be any reference to this Natural Feature within the draft text of the OP. Can you please let me know what Section of the draft OP contains the applicable “Provincial Wildlife Area” policies?</p> <p>Thank you in advance for considering our comments. Please keep us informed and notified of all future Official Plan and Zoning By-law review updates.</p> 	

No	Date	Author/Org	Comments	JLR Recommendation/ Response
6	December 11, 2024	Six Nations of the Grand River	<p>Thanks for getting in touch.</p> <p>Please outline the proposed settlement area boundary expansion for me.</p> <p>Relatedly, it would help having stricter procedures for proponent-driven boundary expansions outside this OP process per the recent provincial change we opposed. We want to discourage those applications/ensure suitable scrutiny. SNGR would like proponents to provide: proof of FN consultation to GV; consultation for natural heritage study terms of reference, and reasonable capacity funding. We would like the city to highlight to such proponents that accommodations will be required for impacts to Aboriginal and treaty rights when warranted, and that SNGR expects them to adhere to the attached environmental levy.</p>	<p>Thank you for your comments. We have updated the settlement area boundary expansion policies to include additional criteria such as the requirement to consult with First Nations communities with treaty rights in the area and the requirement to complete an environmental and archaeological study, where a terms of reference will be established in consultation with review agencies such as the Six Nations of the Grand River.</p> <p>We have also noted in the implementation section, that where a development impacts treaty rights, accommodations will be required where deemed necessary by the First Nation.</p>
7	December 19, 2024	Six Nations of the Grand River	<p>I'm primarily concerned with settlement expansion on the east side because of the presence of many natural features, particularly the Grand River. If this area must be added, we request the Grand River's default setback be changed from 30 to 60 metres to protect animal habitat and decrease impacts to Aboriginal and Treaty rights.</p>	<p>Thank you for your comments.</p> <p>Please note that an overlay has been included within the Official Plan and Zoning By-law which requires applicants within 60 metres of Grand River to consult with Indigenous Communities to determine whether additional environmental review is required and whether a larger setback is needed.</p>
8	December 19, 2024	Haudenosau nee Development Institute (HDI)	<p>HDI expressed interest for their treaty lands within 6 miles of Grand River, expressed concerns with how the Official Plan Review was consistent with Section 6.1 of the PPS and the suitability of relying on the Province's definitions of "natural heritage" and "cultural heritage".</p>	<p>We have met with HDI to discuss their concerns and determine a path forward to address their comments. We have submitted an application to HDI along with a cover letter and draft copies of the Official Plan and Zoning By-law to receive more detailed feedback.</p>

Table 2: Agency Comments Received to Date

No	Date	Author/Org	Comments	JLR Recommendation/ Response
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<p>1</p>	<p>November 21, 2024</p>	<p>Wellington-Dufferin-Guelph Public Health</p>	<p>The below commentary represents WDG Public Health's general comments. Please see Appendix 1 for the detailed public health comments.</p> <p>From a public health and safety perspective, a community is optimally designed when it incorporates an 8-80 cities approach. This approach aims to create communities that are safe, welcoming, accessible and convenient for people of all ages and abilities by designing environments that can be comfortably used by people 8 through 80 years of age. This approach has been shown to compliment growth by improving resident physical and mental health, increasing social connectedness, increasing walking and cycling, and demonstrating a positive economic impact for local businesses. Applying an 8-80s lens to land use planning supports the creation of complete, healthy and sustainable communities.</p> <p>We commend the Town on the inclusion of numerous components in the Draft Official Plan that align with healthy community planning, the 8-80 cities approach and for considering the impacts of climate change. The focus on developing complete communities is evident throughout the Official Plan, including support for residential intensification to accommodate future growth. We applaud the Town's commitment to healthy community design by promoting active transportation, protecting natural features, and encouraging the use of green space. Notable examples include supporting the development of a Town-wide active transportation network, establishing a continuous open space and park system, and protecting natural features from land use impacts.</p> <p>Additionally, we commend the Town for recognizing the importance of integrating climate considerations into land use planning. By considering climate resilience throughout planning stages, the Town can better protect vulnerable populations, ecosystems and promote</p>	<p>We have updated numerous policies in the Official Plan to refer to align with the 8-80 cities approach. In some instances, the term "complete communities" was used to reference this approach as complete communities are defined as <i>"places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, public service facilities, local stores and services. Complete communities are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations."</i></p> <p>Creating safe and accessible spaces was a common comment received by Public Health and we have updated certain policies, where necessary, to highlight the importance of creating safe and accessible public spaces.</p> <p>As it relates to active transportation, many policies were updated to reference creating spaces that support various modes of transportation. In some instances, where policies were regulatory, we chose to keep the policy language more flexible by referring to parking in general and supporting active transportation. Policies have been updated to encourage a grid road network.</p> <p>As it relates to updating policies to provide a stronger position on mitigating climate change, we updated several goals and objective to refer to climate resiliency. We did not update the policies to require that projects detail how the development will be resilient to the impacts of climate change or conducting a vulnerability assessment, as these policies can be quite restrictive and not required in certain situations. Rather, we believe that the policies related to natural and human hazards and goals and objectives, highlight the position that developments should be planned to consider climate change impacts. We also believe that implementing tools such as the Green Development Standards can be used to detail how projects can be designed to mitigate</p>
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			<p>sustainable development. The table below lists further opportunities to strengthen these components.</p>	<p>climate change impacts and do not require proponents to submit planning applications to amend a policy.</p> <p>As it relates to flooding, the Official Plan schedules identify lands subject to flooding risks and details policies for development to avoid or mitigate risks. Stormwater management policies were also updated to consider the increased number of extreme rainfall events and the impacts of road salt.</p> <p>As it relates to policies which speak to the extraction of petroleum resources, these policies were updated in line with the Province's amendments to the County's Official Plan. As it related to agricultural uses, we have updated objectives and goals in line with your suggestions. As it relates to urban agriculture, given the Town's position to only permit backyard chicken and other livestock animals in specific areas in the Town, we have used the term community gardens and/or green roofs in lieu.</p> <p>As it relates to alternative energy, we have included the policy to implement early and transparent community engagement for large renewable projects. However, the policy to prioritize rooftop over ground-mounted renewable energy systems is not required as ground mounted systems would not be permitted in many cases.</p>
2	November 25, 2024	Dufferin County	See attached comments.	<p>Thank you for providing comments. We have addressed the comments as follows:</p> <ul style="list-style-type: none"> <li>• We have retained the population and jobs projections to reflect the numbers referred to in the MMAH notice of decision for COPA #2</li> <li>• We have replaced the term "Environmental Impact Assessment" with "Environmental Impact Study" to ensure consistency across the County and Town OP's</li> <li>• We have included a new section which speaks to contaminated lands policies</li> </ul>

				<ul style="list-style-type: none"><li>• There is no formal name for the impact assessment completed to assess aggregate operation impacts so we have kept the term “impact assessment”</li><li>• We have updated the indigenous consultation policies to make reference to specific first nation groups</li><li>• We have included reference to the County’s Climate Action Plan in the Active Transportation and Electric Vehicle sections</li><li>• Updated all other editorial comments</li></ul>
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