



April 25, 2025

VIA EMAIL ONLY

Town of Grand Valley
5 Main Street North
Grand Valley ON
L9W 5S6

Attention: Mark Kluge, Town Planner

**Re: Grand Valley Official Plan and Zoning By-law Update Project
Public Meeting Comments, May 13, 2025**

Dear Mark,

Thomasfield has reviewed the draft Official Plan Update and Comprehensive Zoning By-law which were released on Grand Valley's municipal website on April 14th, 2025. Please accept this letter as formal written correspondence pertaining to the Grand Valley Official Plan and Zoning By-law Update Project. Kindly find our comments outlined below.

Official Plan Update 2025

Population Allocation

- Section 2.3 – The population allocation went from 99,000 in the previous draft to 100,700. How does the Town intend on accommodating the increased population given the changes to the urban boundary were considered based on a smaller population allocation.

Plans of Subdivision

- Section 4.8 – The Town has added policies related to requirements for draft plan of subdivisions. Section 51 (24) of the Planning Act provides criteria to be considered for draft plans of subdivision. Outlining details required on drawings may be better suited on the municipal website, or on the draft plan of subdivision application form rather than in the Official Plan.

Natural Heritage

- Section 5.2.1.6 – While it is understood that the policies in Section 5.2.1.6 were taken directly from the values criteria in the Province's Natural Heritage Reference Manual, criteria (g) and

(i) are vague in definition which makes it unclear whether a wooded area would meet the criteria. We would recommend removing these criteria or specifying how productivity and air quality improvement is measured in this context. Alternatively, we recommend adding a policy which allows for the evaluation of woodlands through an EIS as part of a development application.

- Section 5.2.2.1 (c) – We have concerns with the application of a standard buffer requirement but are encouraged to see the policy allows this to be evaluated through an EIS. It is our understanding that this would negate the need to apply for a Zoning By-law Amendment should an EIS determine an adequate buffer is not provided.
- Section 5.3.1 (e) – The additional consideration for climate change risks is broad and may require additional clarification or detail to ensure the policy direction is clear in relation to Section 2.9 of the PPS.
- Section 5.3.1.3 – This policy may conflict with policy 5.2.2.1 (c) which allows a smaller buffer to natural heritage areas through the findings and recommendations of an EIS. Section 4.6.1.5 of the PPS requires early consultation with Indigenous communities to ensure their interests are considered. We would appreciate further clarification on the basis for the policy addition.

Cultural Heritage

- Section 5.2.7 – Language around “protected” heritage resources is confusing given the municipality does not currently have a municipal heritage register. We recommend removing the word “protected” and where appropriate, replacing it with “designated under the Ontario Heritage Act”. For example, “Should properties with potential cultural heritage significance be identified by the Town through the development of a formal municipal heritage register, and designated under the Ontario Heritage Act, all development and site alteration shall be in a manner that is sensitive to the cultural heritage resource.”
- We suggest that the last paragraph be modified to read “Council may use site plan control and may require a Heritage Impact Assessment to ensure that new development is sited and designed to complement the historic features and natural character of the Town where development lands contain or are adjacent to a designated heritage resource under the Ontario Heritage Act”.

Site Specific Policy Area 8

- Section 6.12.9 – We would appreciate if the area not be named “Beam -Mayberry Land Consolidation” as it may be associated with Thomasfield’s Mayberry Hills subdivision which is not related to the properties within the policy area.

Comprehensive Zoning By-law

Requirements for Urban Residential Zone

- Table 5.2.2 – There are a number of proposed changes to the Urban Residential zone regulations, while Thomasfield is generally supportive the changes, we wish to seek confirmation from the Town that the zoning applicable to our draft approved Mayberry Hill

Phase 3B is grandfathered under the previous zoning by-law regulations for the Village Residential (RV) zone.

Stormwater Management Zone

- Table 5.4.1 – A Stormwater Management Zone has been introduced in the Comprehensive Zoning By-law. The previous By-law included stormwater management facilities within the OS Zone. We believe the addition of the Stormwater Management Zone is unnecessary as the only permitted use within the Zone are stormwater management facilities and a trail which was adequately permitted within the OS Zone.

As an active home builder in Grand Valley, and Dufferin County, Thomasfield has been participating in the County Municipal Comprehensive Review (MCR) process and monitoring legislative changes at the provincial and local levels. We understand that the update the Town of Grand Valley is undertaking here is required to conform to provincial plans and to tie in with the County's MCR. Thomasfield continues to be an interested party to the progress of the Town's Official Plan and Zoning By-law Update.

We thank you for this opportunity to provide our comments and would request to be included in all future public meetings and consultation. We would also appreciate being added to the mailing list for a final decision on the matter.

Sincerely,



Katherine McLaughlin

cc. Hugh Handy, GSP Group
Charlotte Lewington, GSP Group