

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 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</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</p>

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			<p>Organization of the United Nations, <u>Global Symposium on Soil Erosion, 2019.</u>)</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 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> </ul>	<p>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> <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</p>

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			<p>• 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.</p> <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 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>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>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> <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>	

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			<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 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> </ul>	

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			<ul style="list-style-type: none"> <li>• elimination of permission for residential severances within rural areas of the County</li> <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> <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</li> </ul>	<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</li> </ul>

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			<p>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.</p> <ul style="list-style-type: none"> <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" 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 already undergone a park programming process), and a 2 acre parcel along Amaranth Street.</li> <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> </ul>	<p>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.</p> <ul style="list-style-type: none"> <li>• General comments: spelling mistakes have been corrected.</li> </ul>

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			<p>by the necessary Servicing Master Plan updates, Transportation Master Plan updates, etc. rather than a secondary plan process.</p> <p>General comments:</p> <ul style="list-style-type: none"> <li>- Check spelling “internsification” throughout</li> </ul>	
3	October 29, 2024	Roy Sheardown	<p>I am the owner of Concession 1 N PT LOT 28 113117 27/28 SR EAST LUTHER</p> <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>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 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</p>

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				<p>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 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>

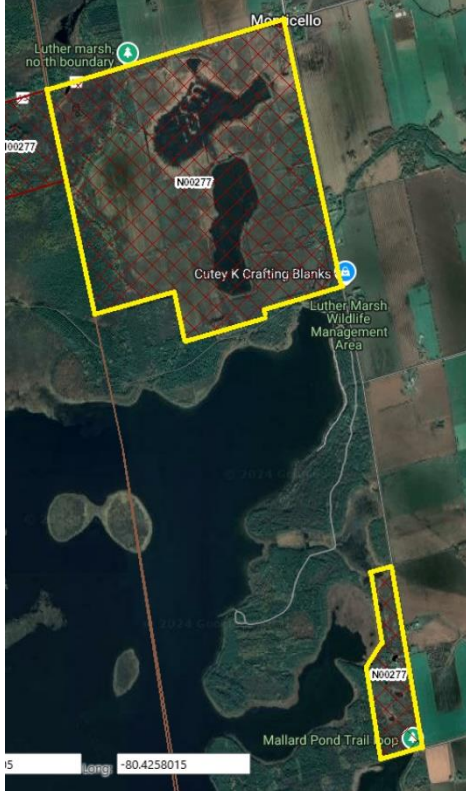
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4	November 20, 2024	Murray and Heather Ritchie	<p>As this site specific policy area 8 includes our vacant lot we are objecting to this official plan change.</p> <p>With the creation of a land consolidation to promote future development would limit 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>We are asking at this time that you consider our concerns and designate these lots urban residential as per the surrounding area.</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>
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</p>	<p>Thank you for your comments. We have taken your comments into consideration and have revised the policy approach for</p>

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			<p>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</b>  <b>RECOMMENDED LAND USE DESIGNATION</b>            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>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>            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</p>	<p>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>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> <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></p> <p>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>	

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			<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="674 461 1262 732"> <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> <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>	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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6	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</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</p>								

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			<p>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>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>	<p>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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7	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</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>

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			<p>impacts to Aboriginal and treaty rights when warranted, and that SNGR expects them to adhere to the attached environmental levy.</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>
8	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>
9	December 19, 2024	Haudenosaunee 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>
10	April 25, 2025	ThomasfieldHomes Limited	<p>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.</p> <p><b>Official Plan Update 2025</b></p> <p>Population Allocation</p> <ul style="list-style-type: none"> <li>○ 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.</li> </ul>	<p>Thank you for your comments. We are pleased to provide the following responses:</p> <ul style="list-style-type: none"> <li>• The updated population in Section 2.3 is related to Dufferin County. That population increase is to be accommodated in Mono.</li> <li>• Section 4.8 has been revised to state that a plan of subdivision must include the information prescribed by Section 51 (17) of the Planning Act.</li> </ul>

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			<p>Plans of Subdivision</p> <ul style="list-style-type: none"> <li>○ 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.</li> </ul> <p>Natural Heritage</p> <ul style="list-style-type: none"> <li>○ 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.</li> <li>○ 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.</li> <li>○ 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.</li> <li>○ 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</li> </ul>	<ul style="list-style-type: none"> <li>● Related to woodlands, Section 5.2.1.6 includes a policy which states that significant woodlands will be determined through the submission of an EIS. We have added the wording “may” to signify that the EIS will be the final determinant of the area and extent of the significant woodlands.</li> <li>● Related to the watercourse setback, there is an existing watercourse setback established in Section 3.24.5 of the Zoning By-law and a new setback requirement has been added to the Grand River, in accordance with the requirements of the Official Plan. A Zoning By-law Amendment would be required to reduce the setback.</li> <li>● Additional details have been added relation to Section 5.3.1 (e)</li> <li>● Section 5.3.1.3 has been revised to remove the word “whether a larger setback is required” to provide clarity that the intent of this provision is to ensure that Indigenous communities are consulted within 60 metres of the Grand River to ensure their treaty rights are protected and their knowledge related to the protection of environmental</li> </ul>

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			<p>the PPS requires early consultation with Indigenous communities to ensure their interested are considered. We would appreciate further clarification on the basis for the policy addition.</p> <p>Cultural Heritage</p> <ul style="list-style-type: none"> <li>○ 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 a in a manner that is sensitive to the cultural heritage resource.”</li> <li>○ 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”.</li> </ul> <p>Site Specific Policy Area 8</p> <ul style="list-style-type: none"> <li>○ 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.</li> </ul> <p><b>Comprehensive Zoning By-law</b></p> <p>Requirements for Urban Residential Zone</p>	<p>features in this area is considered.</p> <ul style="list-style-type: none"> <li>• Comments related to Cultural Heritage have been addressed in the draft Official Plan.</li> <li>• Site Specific Policy Area 8 has been renamed “Amaranth Street Lot Consolidation”.</li> </ul> <p>Related to the comprehensive Zoning By-law, we can confirm that properties whose site specific zoning was approved prior to the approval of the updated Zoning By-law would be grandfathered in.</p> <p>Secondly, the OS zone currently permits a range of uses, including but not limited to passive recreation, agriculture, and conservation, which may not be appropriate for all areas containing stormwater management facilities or adjacent uses. The proposed new Stormwater Management Zone ensures clarity of permitted uses without requiring additional work for staff to implement.</p>

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			<ul style="list-style-type: none"> <li>○ 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.</li> </ul> <p>Stormwater Management Zone</p> <ul style="list-style-type: none"> <li>○ 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.</li> </ul> <p>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.</p> <p>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.</p>	
11	May 9, 2025	KLM Planning on behalf of the United People Corporation	<p><b>All Sections</b></p> <p>It appears that throughout the Official Plan, there inconsistencies with the terminology used between the polices and sections of the plan. For example, the terms 'Greenfield Area', 'Designated Greenfield Area', and 'Greenfield lands' are used interchangeably. In other instances, the term 'Settlement Area', "Urban Area" and 'urban settlement areas' also appear to be used interchangeably. We encourage the streamlining of definitions and terms through the Official Plan to assist with clear and consistent interpretation.</p>	<p>Thank you for your comments. We are pleased to provide the following responses:</p> <ul style="list-style-type: none"> <li>• In relation to your comments regarding consistency between terminology, we have updated terms and definitions where it is</li> </ul>

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			<p><b>Section 4.3</b>  States that 'The boundary of the urban area is identified on Schedule A-1 as Settlement Area', however Schedule A-1 does not identify a 'Settlement Area'.  1. We recommend that the legend for Schedule A-1 be revised to delineate a 'Settlement Area'.  States that 'The Built-up area' is all lands within the limits of the developed urban area as defined on Schedule A-1 and reflects lands that are currently developed'. The "Built-up area' is not identified on Schedule A-1 and this description is not consistent with the 'Delineated Built Boundary' shown on Schedule A-2.  2. We recommend that the legend for Schedule A-2 be revised to replace 'Delineated Built Boundary' with 'Built-up Area'.  3. We recommend that this 'Built-up Area' be expanded to include all currently developed lands within the limits of the Urban Area per the description of 'Built-up Area" provided in Policy 4.3 and the definition provided for 'Built-up area' in Section 10.  4. We recommend that the second sentence of policy 4.3.1.3 f) be relocated to the end of this section as it pertains to Settlement Areas in the Town of Grand Valley so that section 4.3 reads as follows:  'The boundary of the urban area is identified on Schedule A-1 as Settlement Area. It includes the Built-up area, and the Designated greenfield area.  The Built-up area is all lands within the limits of the developed urban area as defined on Schedule A-1 and reflects lands that are currently developed.  The Designated greenfield area includes lands within the Settlement Area that are not built-up.  Leapfrogging development, that is the development of lands outside the settlement area and which are not adjacent to the built-up area, should not be permitted.'</p> <p><b>Policy 4.3.1.1</b>  Provides the objectives for the 'Settlement Area'.</p>	<p>possible to assist with clear and consistent interpretation.</p> <ul style="list-style-type: none"> <li>• We have updated the reference in section 4.3 to refer to schedule A-2.</li> <li>• We have updated the term in schedule A-2 to refer to the built-up area and we have updated the boundary to include all developed lands within the urban settlement area.</li> <li>• Regarding the proposed density target, the target of 44 residents and jobs per hectare is established in the existing Official Plan. Based on conversations with the public, there was a desire to increase the minimum density target beyond the County of Dufferin target to facilitate compact development and discourage sprawl to protect prime agricultural lands from being developed. The density target of 44 residents and jobs per hectare is an existing target in the Official Plan that we have kept based on public feedback and is intended to encourage more compact development.</li> <li>• We have made the modifications suggested to sections 4.8, 4.9, 4.10, 6.3.5 and 6.12.10.</li> <li>• We can confirm that a Secondary Plan is not required</li> </ul>

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			<ul style="list-style-type: none"> <li>• Recommendation #1 above would clarify the area where these objectives are intended to apply.</li> </ul> <p><b>Policy 4.3.1.2</b> Provides the objectives for the 'Built-up area'.</p> <ul style="list-style-type: none"> <li>• Recommendation #2 above would clarify the area where these objectives are intended to apply.</li> </ul> <p><b>Policy 4.3.1.3</b> This policy intended to ensure the appropriate development of Greenfield lands including providing for a diverse mix of land uses, creating complete communities and high quality site design. Subsection f) deals with lands outside of the settlement area which would not include lands within the 'Designated greenfield area'. For this reason, we have suggested above and below that a portion of this policy be relocated to section 4.3 and recommend the following revision to ensure the orderly development of lands within the 'Designated greenfield area'.</p> <p>5. We recommend replacing 'Greenfield lands adjacent to the existing Built-up area' with 'lands within Designated greenfield areas which can be appropriately serviced and developed utilizing existing or planned infrastructure'. As noted in revision #4 above, we recommend relocating the second sentence of this policy to the end of Section 4.3 so that policy 4.3.1.3 f) reads as follows: 'Encourage the development of lands within Designated greenfield areas which can be appropriately serviced and developed utilizing existing or planned infrastructure.'</p> <p><b>Policy 4.4.1</b> States that 'The built up area is identified on Schedule A-2' however there is no 'Built up area' identified, only a 'Delineated Built Boundary'. The definition of 'Built-up Area' in Section 10 is: 'Built-up area: means all land within the limit of the developed urban area as identified by the Town.' As noted above the 'Delineated Built Boundary' does not include all developed land within</p>	<p>to develop lands within Site Specific Policy Area 9.</p> <p>We have modified the definition of settlement area to address the comment in Section 10.10.</p>

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			<p>the Town of Grand Valley.</p> <ul style="list-style-type: none"> <li>Per Recommendation #2 above, we recommend that Schedule A-2 identify the 'Builtup area' as is indicated by the definition and the policy 4.4.1 text.</li> </ul> <p><b>Section 4.5</b> States that 'Lands outside of the Built-up area, but located within the Settlement Area, represent the Designated Greenfield Area as shown on Schedule A2.'</p> <ul style="list-style-type: none"> <li>Revision #1 and #2 would show a 'Settlement Area' and "Built-up' Area on Schedule A-2 and provide clarity as to what is 'Designated Greenfield Area'.</li> </ul> <p><b>Policy 4.5.1</b> States that 'designated greenfield areas will be planned to achieve a greater minimum density target of 44 residents and jobs combined per hectare, and will encourage development to exceed the minimum density target'.</p> <p>We note that the Dufferin County Official Plan requires a minimum density target of 32 persons and jobs per hectare. The Growth Plan 2019 as it pertained to the Dufferin County and Town of Grand Valley Official Plans was rescinded on October 20, 2024. The new Provincial Planning Statement 2024 does not contain prescriptive density targets except that 'large and fast-growing municipalities' are encouraged to plan for 50 persons or jobs within a 'designated growth area'. This provides some policy context that 44 persons / jobs per hectare may be an ambitious target based on the designated growth area targets for large and fast growing municipalities.</p> <p>We would appreciate a discussion with Town planning staff on the rationale and basis for 44 persons / jobs per hectare. An appropriate alternative might be to simply require the minimum density prescribed by the Dufferin Official Plan but with the addition of policy language to promote or require consideration of a higher density, so as to allow for a level of flexibility to facilitate appropriate community development standards in the designated greenfield area.</p> <p>6. We would recommend an alternative to require a minimum of 32 residents and jobs per hectare as required by the Dufferin Official Plan so that policy 4.5.1 reads as follows:</p>	

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			<p>‘The County of Dufferin Official Plan establishes a minimum density target of 32 residents and jobs per hectare within Grand Valley’s designated greenfield area. Understanding that development is constrained within Grand Valley’s Built-up area due to flooding hazard, the Town of Grand Valley will encourage development to exceed this minimum density target, provided that higher density developments meet the policies of this plan and address compatibility concerns such as shadowing. Development in the designated greenfield area will be planned to support the achievement of complete communities, efficiently use land and resources, optimize existing and planned infrastructure and public resources, support active transportation and alternative modes of transportation, including future transit, and protect natural features and areas.’</p> <p><b>Section 4.7</b> States that ‘Prior to considering development in greenfield areas Council shall consider opportunities for infill, intensification and redevelopment.’ Given the geographic characteristics of Grand Valley and the overall need to promote new housing and residents to support complete community objectives in the Town, we believe that this is overly restrictive and may not lead to a balanced approach to development within both the ‘Designated greenfield area’ and the ‘Built-up area’. There are policies within the Official Plan that support the orderly development of land within the settlement area on the basis of appropriate servicing and phasing. This policy would arbitrarily restrict development in the ‘Designated greenfield area’, even where it can be demonstrated that development is orderly and can be serviced and phased appropriately. Furthermore, the current provincial direction under the Provincial Planning Statement 2024 no longer prescribes the hierarchy.</p> <p>7. We recommend deleting the last sentence and replacing it with ‘Development in Designated greenfield areas shall be balanced with opportunities for infill, intensification and redevelopment within the Built up area.’ so that section 4.7 reads: ‘Development shall be staged in accordance with the availability of municipal sewage and water services and stormwater management in a manner that makes the most efficient use of</p>	

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			<p>available services. Development through plans of subdivision may be phased to ensure that there is an appropriate range of housing type, tenure and cost in each stage of the development process. Such phasing will be addressed through subdivision agreements.</p> <p>Development in Designated greenfield areas shall be balanced with opportunities for infill, intensification and redevelopment within the Built up area.'</p> <p><b>Section 4.8</b> Provides policies for Plans of Subdivision or Condominium. This section stipulates that a Plan of Subdivision shall be required where three or more lots are being created from a single parcel of land. Exceptions are considered for the Settlement Area where there are no residual lands resulting from the development and there is no need to extend municipal services.</p> <p>8. We recommend additional language to allow exceptions to this policy for approved draft plans of subdivision to facilitate servicing, financing and phasing of their registration such that policy 4.8 reads as follows: 'Where three or more lots are to be created from a single parcel of land existing as of the date of adoption of this Plan, a Plan of Subdivision or Condominium shall generally be required. Exceptions to this policy may be considered in the Settlement Area where:</p> <ul style="list-style-type: none"> <li>i) there are no residual lands resulting from the development and there is no need to extend municipal services including roads; and</li> <li>ii) the consent applies to lands that are within, or will facilitate the construction and conveyance of infrastructure for, an approved draft plan of subdivision and to finance and phase the registration of an approved draft plan of subdivision.</li> </ul> <p>Intensification and infilling lots will generally be considered through the Consent process. The following policies apply to all development by Plan of Subdivision or Condominium: ... '</p>	

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			<p><b>Section 4.9</b>            Provides policies that apply to all division of land in the Town. Subsection g) stipulates that 'new lots created via consent within the new urban settlement areas will not be permitted'. In our opinion, this policy conflicts with the balance of the polices in 4.8, 4.9 and 4.10 which deal with the division of land in the Town of Grand Valley. The polices contained with the 4.8, 4.9 and 4.10 set out the appropriate framework to evaluate land division on a case by case basis.</p> <p>An outright prohibition of land division via consent with the settlement area may result in the inability for landowners to sever land to address appropriate approaches to phasing and servicing in the Designated greenfield area. This is contrary to polices in the Official Plan that promote the orderly development of land. The term 'new urban settlement areas' is not well understood within the context of the Designated greenfield area and Built up area definitions.</p> <p>9. We recommend that 4.9 g) be deleted in its entirety.</p> <p><b>Section 4.10</b>            Provides circumstances where 'technical consents' may be considered. We believe that consents can be an appropriate mechanism to create lots that facilitate the construction and conveyance of infrastructure that support draft approved plans of subdivision as well as to facilitate the financing and phasing of draft plan of subdivision registration.</p> <p>8. We recommend adding a further subsection to policy 4.10 that reads as follows:            'e) to create a lot on lands that are within, or will facilitate the construction and conveyance of infrastructure for, an approved draft plan of subdivision and to facilitate the financing and phasing of subdivision registration.'</p> <p><b>Policy 6.3.5</b>            Provides direction on severance within the Urban Residential designation. In keeping with recommendations 8 and 9 we request</p>	

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			<p>additional flexibility as it relates to facilitating servicing and registration for draft approved plans of subdivision.</p> <p>9. We recommend an additional sentence so that policy 6.3.5 reads as follows: 'Infilling, intensification and redevelopment through the creation of lots by severance may be permitted. Otherwise, all new residential lots shall be created by Plan of Subdivision or Plan of Condominium. The creation of lots by severance may be permitted to facilitate the construction and conveyance of infrastructure for approved draft plans of subdivision as well as financing and phasing of draft plan registration.'</p> <p><b>Policy 6.12.10</b> Provides policies related to Site Specific Policy Area 9. The fifth bullet point provides that consents shall not be permitted.</p> <p style="padding-left: 40px;">10. We recommend adding the following to the end of the fifth bullet point of the policy "and to facilitate the construction and conveyance of infrastructure as well as the financing and phasing of registration for an approved draft plan of subdivision."</p> <p>So that the fifth bullet to policy 6.12.10 reads as follows: 'Notwithstanding Section 4.9, applications for consent will not be permitted in Site Specific Policy Area 9, save for lot adjustments for legal or technical purposes and to facilitate the construction and conveyance of infrastructure as well as the financing and phasing of registration for an approved draft plan of subdivision.'</p> <p>Section 9.13 Provides policies related to the secondary plan process. While this section details the requirements and basis for secondary plans, there is no direction on where a secondary plan may be required by the Town. This policy exists without any understanding of where or how it will be implemented. Furthermore, in light of the recent changes made to the draft amendment, we understand that this policy does not relate to our client's lands and that the Town will not be requiring a Secondary Plan on our client's lands. This appears to be the case on the basis of the area-specific policies which exist in Section 6.12.10 of the Draft OP, which requires a master plan/area design to be submitted demonstrating</p>	

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			<p>how the lands will be planned comprehensively to contain a mix of uses and an interconnected transportation network. We respectfully request confirmation of this and clarity on the implementation of these policies dealing with secondary plans.</p> <p><b>Section 10.10</b> The definition of Settlement Area appears to not include 'Greenfield Areas' notwithstanding that these lands 'have been designated for future development'. 11. We recommend deleting 'built-up areas in urban areas' and replacing it with 'lands within the Urban Area as identified on Schedule A-2' as well as deleting 'including lands that have been designated for future development in this Plan. So that definition reads as follows: 'Settlement Area: means lands within the Urban Area as identified on Schedule A-2 and rural settlement areas within the Town, where development is concentrated and which have a mix of land uses.'</p>	
11	May 13, 2025	Aldo Marascio	<p>Aldo Marascio, a local landowner, stated he has a farm in the south end of the Town. He inquired as to whether he would be permitted to subdivide his land once the new OPA was approved. At the public meeting, it was confirmed that Mr. Marascio could not subdivide his land but that he may be able to build two additional residential units on his property. However, Mr. Marascio raised concerns that if he built an additional residential unit on his property, his daughter could not secure financing as she did not own the land, which was a barrier. He asked whether this policy could be changed.</p>	<p>Changing this policy would contravene provincial policy. The property cannot be subdivided unless through a surplus farm dwelling process.</p>
12	July 15, 2025	Canacre Ltd. on behalf of Infrastructure Ontario (IO) and Hydro One Networks Inc.	<p>Canacre Ltd. on behalf of Infrastructure Ontario (IO) and Hydro One Networks Inc. (Hydro One), has reviewed the Draft Official Plan dated April, 2025. Infrastructure Ontario is the strategic manager of the provincial government's real property, which includes hydro corridor lands, and has a mandate of maintaining and optimizing value of the portfolio. Hydro One Networks Inc. jointly manages the hydro corridors owned by the Province with IO and is involved in the planning, construction, operation, and maintenance of their transmission and distribution network</p> <p>This review of the Draft Official Plan takes direction from the Provincial Planning Statement (PPS) (effective October 20, 2024) as it relates to</p>	<p>Thank you for your comments. Please find our responses below:</p> <ol style="list-style-type: none"> <li>1. Definitions: As section 10.10 relates to definitions, we have proposed modification to the wording so that it reads less like a policy but still maintains the overall intent to allow for secondary uses where it does not interfere with the primary function of the hydro corridor:</li> </ol>

No	Date	Author/Org	Comments	JLR Recommendation/ Response
			<p>electricity generation facilities and transmission and distribution systems. In particular, PPS Sections 3.1, 3.3, and 3.8 provide specific direction for municipalities to maintain the primacy of hydro corridor lands for the transmission and distribution of electricity throughout the province. The relevant PPS Sections include:</p> <p><b>3.1.1</b> <i>Infrastructure and public service facilities shall be provided in an efficient manner that prepares for the impacts of a changing climate while accommodating projected needs.</i></p> <p><i>Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they are:</i></p> <p><b>a)</b> <i>are financially viable over their life cycle, which may be demonstrated through asset management planning;</i></p> <p><b>b)</b> <i>leverage the capacity of development proponents, where appropriate;</i></p> <p><i>and</i></p> <p><b>c)</b> <i>are available to meet current and projected needs.</i></p> <p><b>3.3.1</b> <i>Planning authorities shall plan for and protect corridors and rights-of-way for infrastructure, including transportation, transit and electricity generation facilities and transmission systems to meet current and projected needs.</i></p> <p><b>3.3.3</b> <i>Planning authorities shall not permit development in planned corridors that could preclude or negatively affect the use of the corridor for the purpose(s) for which it was identified.</i></p> <p><i>New development proposed on adjacent lands to existing or planned corridors and transportation facilities should be compatible with, and supportive of, the long-term purposes of the corridor and should be designed to avoid, or where avoidance is not possible, minimize and mitigate negative impacts on and adverse effects from the corridor and transportation facilities.</i></p> <p><b>3.8.1</b> <i>Planning authorities should provide opportunities for the development of energy supply including electricity generation facilities and transmission and distribution systems, energy storage systems, district energy, and renewable energy systems and alternative energy systems, to accommodate current and projected needs.</i></p> <p><b>Concerns</b></p>	<p><i>“In regard to transportation and infrastructure corridors, any development or site alteration that would compromise or conflict with the planned or existing function, capacity to accommodate future needs, and cost of implementation of the corridor. <b>Nonetheless, secondary uses, such as active and passive recreation, agriculture, community gardens, other utilities and uses such as parking lots and outdoor storage that are accessory to adjacent land uses, may be permitted on hydro corridor lands where compatible with surrounding land uses provided it does not interfere with the primary function of a hydro corridor, for electricity generation facilities and transmission and distribution systems.”</b></i></p> <p>2. <b>Terminology:</b> we have updated the terminology where appropriate. Changes were not made where it related electricity generation for OFDUs.</p> <p>3. <b>Secondary Uses:</b> Suggested policy has been added to that section.</p>

No	Date	Author/Org	Comments	JLR Recommendation/ Response
			<p><b>1. Terminology</b></p> <p><b>Section 10.10 (Definitions) states:</b>            Negative impacts: may mean:            e. In regard to transportation and infrastructure corridors, any development or site alteration that would <b>compromise or conflict with the planned or existing function, capacity to accommodate future needs, and cost of implementation of the corridor.</b></p> <p>We request that this policy be revised to state the following:            Negative impacts: may mean: e. In regard to transportation and infrastructure corridors, any development or site alteration that would compromise or conflict with the planned or existing function, capacity to accommodate future needs, and cost of implementation of the corridor.</p> <p><b>Nonetheless, secondary uses, such as active and passive recreation, agriculture, community gardens, other utilities and uses such as parking lots and outdoor storage that are accessory to adjacent land uses, are encouraged on hydro corridor lands where compatible with surrounding land uses. A proponent should be aware that the primary function of a hydro corridor is for electricity generation facilities and transmission and distribution systems, and that secondary uses require technical approval from Hydro One Networks Inc.</b></p> <p><b>Terminology Recommendation</b>            We would like to encourage a consistent approach to defining hydro corridors and electricity infrastructure facilities throughout the province. Accordingly, it is requested that the following language be considered for use throughout the Draft Official Plan, including in the definition of "Infrastructure."  <ul style="list-style-type: none"> <li>• All references to Hydro One should be referred to as "Hydro One Networks Inc."</li> <li>• All references to corridors used for the transmission and distribution of electricity should be referred to as "hydro corridors."</li> <li>• All references to electricity infrastructure and facilities should be referred to as "electricity generation facilities and transmission and distribution systems."</li> </ul> </p>	

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			<p><b>2. Secondary Uses</b></p> <p>We request the addition of the following policy to Section 8.8 (Development Policies):            “Secondary uses, such as active and passive recreation, agriculture, community gardens, other utilities and uses such as parking lots and outdoor storage that are accessory to adjacent land uses, are encouraged on hydro corridor lands, where compatible with surrounding land uses. However, a proponent should be aware of the primacy of a hydro corridor is for electricity generation facilities and transmission and distribution systems, and that secondary uses require technical approval from Hydro One Networks Inc.”</p> <p>The requested policy provides flexibility for future uses on hydro corridor lands. The inclusion of this policy offers clarity with respect to the types of secondary uses that are possible on hydro corridor lands, in accordance with the Provincial Secondary Land Use Program. Having these policies in place will also streamline the number of municipal planning approvals that a proponent must seek when applying for a secondary use from Hydro One/IO.</p> <p>We would request that this letter be included as part of the record of submissions for the Draft Official Plan and that we be notified of any decisions regarding these matters.]</p>	
13	October 16, 2025	Thomasfield Homes Limited	<p><b>Official Plan:</b></p> <p>Section 5.5.1(b): This section references “Green Design Standards” and should be removed. On June 19, 2025 the Ministry of Municipal Affairs and Housing issued a letter to municipalities noting (letter appended): “Municipalities cannot use provisions in the Municipal Act, City of Toronto Act, and Planning Act, including site plan control, to create and require construction or demolition standards for buildings. This includes, but is not limited to, local green building standards or green development standards as they pertain to the construction of a building, including any energy efficiency requirements for buildings”</p> <p>Section 6.12.10: This section capitalizes the term “Community Employment Needs”, but this terminology is not found elsewhere within the Official Plan. If it is intended to be a defined term it should be included in the definitions.</p>	<p>Thank you for your comments. We are pleased to prepare the following responses:</p> <ul style="list-style-type: none"> <li>• References to Green Design Standards have been removed.</li> <li>• The term Community Employment Needs is no longer capitalized.</li> <li>• OP Schedule A-2 has been updated with a thicker border line to more legibly delineate the Site Specific Policy Areas. Due to the complexity of the policy areas and information on Schedule A-2, it is challenging to display the Site Specific Policy Area boundaries without a hatching applied. For</li> </ul>

No	Date	Author/Org	Comments	JLR Recommendation/ Response
			<p>Schedule A-2: With the Special Policy Area hatching, it is unclear on Schedule A-2 where SPA-9 and SPA-3 areas are delineated on the former gravel pit lands.</p> <p>Schedule D: While Schedule D is not a land use schedule, it does identify “mineral aggregate resource operation” on Thomasfield’s former gravel pit lands. We would like to make it clear that there are no active aggregate licenses associated with the property, the former licenses were revoked approximately a decade ago.</p> <p>Appendix C: The colour scheme, designations and legend within Appendix C are based on the 2016 Official Plan and should be updated to reflect what is shown on Schedule A-2, for instance the former gravel pit lands are shown with an extractive industrial designation but should be coloured to reflect the urban residential designation of Schedule A-2.</p> <p><b>Comprehensive Zoning By-law:</b></p> <ul style="list-style-type: none"> <li>• The former gravel pit lands are identified with an MX Zone. Thomasfield would suggest that the lands be placed in a Development (D) Zone to reflect the corresponding Official Plan designation of “Urban Residential”</li> <li>• Within the Index Maps in particular Maps 9, 10, 16, 17, 23 (there may be more) the red dashed "Urban Area" line does not sync up with the underlying zone. For instance, on Map 10 there is "Development (D)" area shown outside of the "Urban Area" dashed line on River's Edge.</li> <li>• Table 5.2.2 rear lane townhouse rear yard setback regulation may be a typo. It says minimum rear yard: 0.75m. All other uses require 7.5m perhaps the decimal is in wrong location.</li> </ul>	<p>detailed reference, proponents are recommended to refer to their site specific OP Amendment documents.</p> <ul style="list-style-type: none"> <li>• The suggested changes to OP Schedule D have been made.</li> <li>• Appendix C is outside the scope of this Official Plan review and colour changes can be made by the Town’s GIS consultant following adoption of the Official Plan.</li> <li>• The suggested changes to Zoning By-law Schedules have been made.</li> <li>• The required rear yard setbacks for rear lane townhouses is 0.75 m. A reduced setback is common practice for such types of townhouses to balance an appropriate buildable footprint, location of a garage in proximity to the laneway, and allowing a minimum area required municipal works and/or maintenance.</li> </ul>

**Table 2: Agency Comments Received to Date**

No	Date	Author/Org	Comments	JLR Recommendation/ Response
1	November 21, 2024	Wellington-Dufferin-Guelph Public Health	<p>The below commentary represents WDG Public Health’s general comments. Please see the detailed public health comments attached to this memo.</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</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</p>

No	Date	Author/Org	Comments	JLR Recommendation/ Response
			<p>populations, ecosystems and promote sustainable development. The table below lists further opportunities to strengthen these components.</p>	<p>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 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.</p> <p>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>

No	Date	Author/Org	Comments	JLR Recommendation/ Response
2	November 25, 2024	Dufferin County	Comments were provided in line throughout the full Draft Official Plan. A full copy of the draft document with Dufferin County mark ups can be provided upon request.	<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> <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>
3	December 4, 2024	GRCA	<p>The GRCA are pleased to offer the following comments/recommendations for your consideration:</p> <ol style="list-style-type: none"> <li>1. Proposed development within land regulated by the GRCA will require prior written consent from the GRCA in the form of a permit pursuant to Ontario Regulation 41/24.</li> <li>2. The Ministry of the Environment, Conservation and Parks (MECP) is referred throughout the document as the Ministry of the Environment.</li> <li>3. <i>Section 5.9 e) and 6.3.1 d)</i>; GRCA recommends including a definition for <i>safe and adequate access</i>. GRCA definition for safe access can be found in our policy document for the administration of Ontario Regulation 41/24 (May 24, 2024) found on our website</li> </ol>	We have modified the document to address GRCA comments.

No	Date	Author/Org	Comments	JLR Recommendation/ Response
			<p>here:<a href="https://www.grandriver.ca/media/lxfghwwe/policies-for-admin-of-ont-reg-41-24-final-1.pdf">https://www.grandriver.ca/media/lxfghwwe/policies-for-admin-of-ont-reg-41-24-final-1.pdf</a></p> <ol style="list-style-type: none"> <li>4. <i>Section 6.2.1.5</i>; Please note that the GRCA no longer regulates 120 metres from Provincially Significant Wetlands or wetlands greater than 2 hectares in size. GRCA standard regulated area is now 30 metres from the limit of all wetlands.</li> <li>5. <i>Section 6.2.1.5</i>; Note that the GRCA will not permit development within any wetland unless applicable policies (8.4.3 to 8.4.8) in our policy document for the administration of Ontario Regulation 41/24 (May 24, 2024) are satisfied.</li> <li>6. <i>Section 6.2.1.5</i>; We recommend including Conservation Authority in the second paragraph, i.e. <b><i>“The Ministry of Natural Resources and Conservation Authority should be consulted for further information on wetlands, wetland limit delineation, evaluations.....”</i></b></li> <li>7. <i>Section 6.3.1.2 b)</i>; We recommend that this read <b><i>“Within the Settlement Area, those lands identified as the flood fringe as shown on Schedule C2 as determined by the Grand River Conservation Authority (GRCA), development and site alteration may be permitted in accordance with applicable GRCA policies, subject to.....”</i></b></li> <li>8. <i>Section 6.3.1.2 b) i)</i>; We recommend this read <b><i>“development and site alteration is carried out in accordance with applicable GRCA policies, floodproofing standards, .....</i>”</b></li> <li>9. <i>Section 6.3.1.2 e)</i>; The GRCA have additional prohibited uses with the riverine flooding hazard. Please see items a) through e) listed in Policy 8.1.35 of our policy document. We recommend including these items or referring to GRCA policy.</li> <li>10. <i>Section 7.11.5</i>; We recommend that the second paragraph read <b><i>“....to the satisfaction of Council and the GRCA.”</i></b></li> </ol>	

No	Date	Author/Org	Comments	JLR Recommendation/ Response
4	November 22, 2024	MTO	<p>For item - 6.4 Storm Water Management, Subsection vi. Can the wording be revised as follows:            ‘The planning and design of stormwater management facilities should be undertaken in accordance with the Ministry of Environment’s Stormwater Management Planning and Design Manual. When the property is located adjacent to a Provincial Highway the Stormwater Management Report will also need to adhere to the MTO Stormwater Management Requirements for Land Development Proposals.’”</p>	<p>We have modified section 6.4 to address MTO comments.</p>
5	April 25, 2025	Muriel Kim Brisson, BluMetric	<p>We took a closer look at the text within the Official Plan and Zoning By-Law and noticed some inaccuracies that we wanted to bring to your attention. These were not spotted before because the focus was on making sure that the mapping was correctly updated to include the newest well and its WHPAs, which they are.</p> <p>Namely, the Official Plan and ZBL have some inaccurate details with respect to the GRSPA Source Protection Plan. For example, Section 5.2.2.4.5 of the OP lists a bunch of activities that are apparently prohibited in a WHPA 10, when they are actually not:</p> <ul style="list-style-type: none"> <li>- Handling and storage and application of commercial fertilizer and pesticide (prohibition applies only to <i>future</i> handing and storage of commercial fertilizer and pesticides)</li> <li>- Use of land as livestock grazing, or pasturing land, an outdoor confinement area or farm animal yard (would be subject to an RMP rather than being prohibited)</li> <li>- Future handling and storage of road salt (prohibition only applies to future handling and storage of road salt in WHPA-A (just requires an RMP in WHPA-B (10))</li> </ul>	<p>The suggested simplified approach was taken for both the OP and ZBL, to remove specific permissions and restricted uses and instead direct readers to the Grand River Source Protection Plan for the detail most appropriate to their proposed use. This allows for greater flexibility whenever the Source Protection Plan is subject to change.</p>

No	Date	Author/Org	Comments	JLR Recommendation/ Response
			<ul style="list-style-type: none"> <li>- Future handling and storage of fuel more than 2,500 L (prohibition applies specifically to WHPA-A; WHPA-B (10) would just require an RMP).</li> </ul> <p>The prohibition list in the OP is also not complete. It's missing the prohibition against future handling and storage of DNAPLs in WHPA 10, for instance.</p> <p>Section 2.9 of the ZBL similarly lists activities that are apparently prohibited in WHPA-A, WHPA-B and WHPA-C, but are actually not. I didn't cross-reference every single item, but some inaccuracies I spotted include:</p> <ul style="list-style-type: none"> <li>- Handling and storage of fuel more than 2,500 L is listed in the ZBL as prohibited in WHPA-A (it's only prohibited in future circumstances, but not existing)</li> <li>- Salt storage is listed as prohibited in WHPA-A (it's only prohibited in future circumstances, but not existing)</li> <li>- Salt storage is listed as prohibited in WHPA-B (10) (it's not actually prohibited at all)</li> </ul> <p>Maybe the text in the OP and ZBL originally reflected an older version of the Source Protection Plan, but in any case, we thought it may be best to address the issue now, during the review of both documents. Perhaps the best approach is to use more generic text in order to "future-proof" the documents against future changes to the Director's Technical Rules and to the Source Protection Plan. The Township of Centre Wellington uses this approach of using generic text (a snippet from their <a href="#">Official Plan</a> is pasted below).</p>	

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			<p><b>4.9.5.3 Land Use &amp; Activity Prohibitions, Regulations, and Restrictions within Vulnerable Areas</b></p> <p><i>Significant drinking water threats</i> within <i>vulnerable</i> areas are either prohibited or regulated by Source Protection Plan policies. The significance of a prescribed <i>drinking water threat</i> depends on the characteristics of the <i>activity</i> and where the <i>activity</i> is occurring within a <i>vulnerable</i> area. Appendix 4 to this Plan identifies where Source Protection Plans apply within the County of Wellington.</p> <p>Notwithstanding the land uses permitted by the underlying land use designation in this Official Plan:</p> <p>a) permitted land uses that involve a <i>significant drinking water threat</i> within a <i>vulnerable</i> area identified in Schedule C to this Plan may be either prohibited or regulated by the applicable Source Protection Plan.</p>													
6	May 13, 2025	GRCA	<p><b>Recommendation</b></p> <p>GRCA has no objection to the approval of this Official Plan Amendment and related Zoning By-law Amendment. The following comments are provided for consideration.</p> <p><b>Documents Reviewed by Staff</b></p> <p>Staff have reviewed the following documents:</p> <ul style="list-style-type: none"> <li>Draft Official Plan Update for the Town of Grand Valley 2025, including maps and schedules</li> <li>By-Law 2025-XX, Town of Grand Valley Draft Comprehensive Zoning By-Law 09-10, as amended, including maps and schedules.</li> </ul> <p><b>GRCA Comments</b></p> <p>GRCA has reviewed these documents under the Mandatory Programs and Services Regulation (Ontario Regulation 686/21), including acting on behalf of the Province regarding natural hazards identified in Section 5.2 of the Provincial Planning Statement (PPS, 2024), as a regulatory authority under Ontario Regulation 41/24 and as a public body under the <i>Planning Act</i> as per our CA Board approved policies.</p> <p><b>Official Plan</b></p> <table border="1" data-bbox="548 1279 1199 1458"> <thead> <tr> <th>Page</th> <th>Section</th> <th>GRCA comment</th> </tr> </thead> <tbody> <tr> <td>34</td> <td>Plan of Subdivision and Plans of Condominium 4.8 b) 7</td> <td>GRCA recommends that floodplains and riverine erosion hazards be illustrated on Draft Plans.</td> </tr> <tr> <td>35</td> <td>Lot Creation 4.9 f)</td> <td>The GRCA recommends that new lots be located entirely outside of natural hazards.</td> </tr> <tr> <td>39-40</td> <td>Building Strong Communities, Additional Residential Units</td> <td>Please note that the creation of an additional residential unit (ARU) is considered development under Ontario Regulation 41/24. Any development or site alteration</td> </tr> </tbody> </table>	Page	Section	GRCA comment	34	Plan of Subdivision and Plans of Condominium 4.8 b) 7	GRCA recommends that floodplains and riverine erosion hazards be illustrated on Draft Plans.	35	Lot Creation 4.9 f)	The GRCA recommends that new lots be located entirely outside of natural hazards.	39-40	Building Strong Communities, Additional Residential Units	Please note that the creation of an additional residential unit (ARU) is considered development under Ontario Regulation 41/24. Any development or site alteration	<p>We have addressed the changes requested by the GRCA save for the request that all new lots be located outside of natural hazards. There may be situations where a new lot can contain sufficient developable area while still including some hazard lands.</p>
Page	Section	GRCA comment														
34	Plan of Subdivision and Plans of Condominium 4.8 b) 7	GRCA recommends that floodplains and riverine erosion hazards be illustrated on Draft Plans.														
35	Lot Creation 4.9 f)	The GRCA recommends that new lots be located entirely outside of natural hazards.														
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			Page	Section	GRCA comment	
				5.1.2.3	<p>including the creation of an ARU within a GRCA regulated area would require a GRCA permit. Additional Residential Units are not supported in One-Zone floodplain policy areas. For the GRCA to support and issue a permit for an ARU within a GRCA regulated area, safe access must be present. ARUs may be permitted in Two Zone Fringe floodplain policy areas subject to meeting the applicable policies such as floodproofing.</p> <p>The GRCA recommends that safe access be required for ADUs where a driveway or access way is proposed to lands outside of a Riverine Flooding Hazard or Riverine Erosion Hazard.</p>	
			44-45	Wise Use and Management of Resources, Locally Significant Wetlands 5.2.1.5.2	Please note that under Ontario Regulation 596/22: Prescribed Acts, the GRCA cannot review or provide comment on Natural Heritage matters including potential ecological functions, on proposals, applications, or other matters under a prescribed Act, including the Planning Act. The GRCA will review EIS for potential hydrologic impacts to wetlands for development activities within our regulated area, which includes is 30 metres from wetlands.	
			58	Protecting Public Health and Human-Made Hazards, Natural Hazards and Human-Made Hazards 5.3.1 f)	<p>The GRCA recommends the following uses also identified as not permitted within lands affected by natural hazards:</p> <ul style="list-style-type: none"> <li>i) associated with the outdoor storage of any materials, either temporary or permanent,</li> <li>ii) those associated with an assisted living facility.</li> </ul>	
			60	Protecting Public Health and Human-Made Hazards, Steep Slopes and Ravines 5.3.1.4	Section 5.1.4 identifies that a slope stability report shall be required that confirms that the slopes will be stable during and after construction. The GRCA recommends that it be clarified that new development is not permitted within a riverine erosion hazard.	
			62	Stormwater Management 5.4 a)	<p>GRCA's review of stormwater management reports is limited to applications where development activity is proposed within GRCA's regulated area. There, we suggest that the text be revised to:</p> <p>Applications for new and expanding commercial, industrial, recreational and institutional development having a floor area in excess of 200 m<sup>2</sup> and residential development of more than 5 lots shall be accompanied by a Stormwater Management Report prepared by a qualified professional to the satisfaction of the Town and the Conservation Authority, where required.</p>	
			62	Stormwater Management	The GRCA recommends that the text be revised to:	

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			<b>Page</b>	<b>Section</b>	<b>GRCA comment</b>	
				5.4 c)	No development will be approved that results in post-development run-off rates that are greater than pre-development run-off rates for storms up to and including the 100 year flood event or does not meet criteria requested by the Conservation Authority and the Town.	
			68	Prime Agricultural, Permitted Uses 6.1.3 c)	The GRCA recommends that it be identified (potentially within Section 6.1.4) that ARU's are not permitted within natural hazards and/or where safe access is not available. Within Section 4.9 safe access appears to be a requirement only for Lot Creation.	
			71	Rural Employment, Severance Policies 6.1.5	The GRCA recommends that is be identified that new lots shall not be created within natural hazards.	
			99	Environmental Protection, Permitted Uses 6.11.3	The GRCA recommends that this text be modified to state that development may be permitted within wetlands and other natural hazards, in accordance with the GRCA's Policies for the Administration of the Prohibited Activities, Exemptions and Permits Regulation and approved by the Grand River Conservation Authority.	
			<p><b>Zoning By-Law</b>            The GRCA offers the following advisory comments for your consideration to policies outlined in draft the Comprehensive zoning by-law amendment policies.</p>			
			<b>Page</b>	<b>Section</b>	<b>GRCA comment</b>	
			34	Plan of Subdivision and Plans of Condominium 4.8 b) 7	GRCA recommends that floodplains and riverine erosion hazards be illustrated.	
			21	Flood Fringe (F) Symbol 2.8 vii.	The Regulation should be updated from 150/05 to 41/24.	
			28-30	General Provisions, Dwelling Units 3.1.6-3.1.8	The GRCA recommends that text be added that identifies that all new dwelling units must be located outside of Natural Hazards and that safe access must be available.	