

Background Report

New and Updated Policy Directions in the 2024 Provincial Planning Statement

Township of Georgian Bluffs Comprehensive Official Plan Review

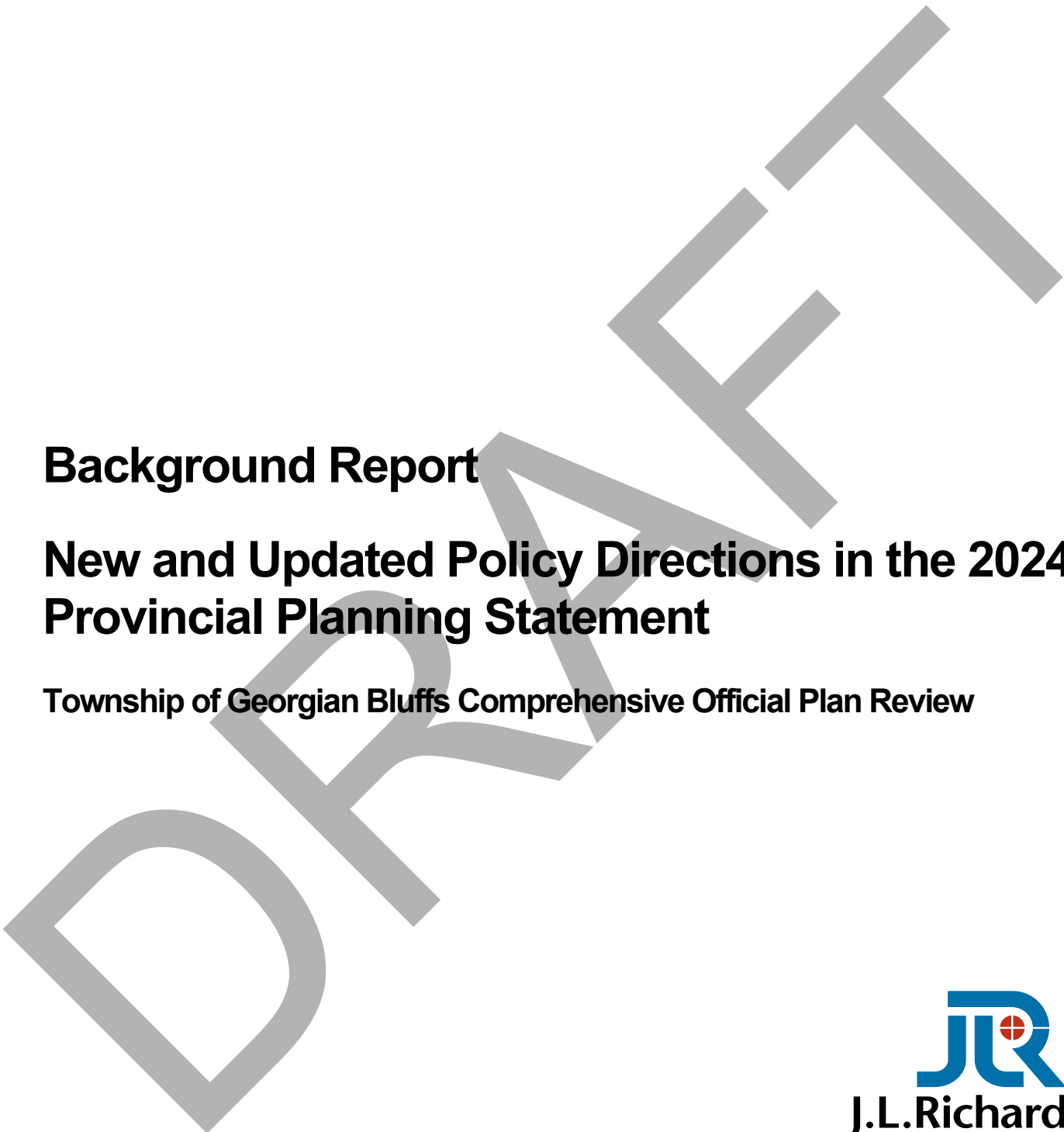


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1.0 Introduction

The Township of Georgian Bluffs (the Township) is a lower-tier municipality located in the northwest corner of Grey County (the County) on Georgian Bay. The Township has many natural heritage features, and a large portion of its land area is considered part of the Niagara Escarpment. The Township also has a strong agricultural community contributing to the local economy and defining the rural character of the Township.

According to the 2021 Census, the Township was home to approximately 11,100 people. The Township is experiencing noticeable growth and increase in development activity. It also has a strong seasonal population base that creates substantial fluctuations in the summer months due to its significant natural and cultural heritage.

The Township, much like other municipalities in southern Ontario, is witnessing considerable change. Cyclical population changes, an aging population, climate change, economic restructuring, the need for affordable and attainable housing, short-term rental accommodation, heritage preservation, increasing pressure on agricultural land, source water protection, and servicing requirements present opportunities and challenges for the Township.

The Township of Georgian Bluffs Official Plan (Township Official Plan) is a key tool that the community uses and can continue to use to navigate these changes. The Township Official Plan was adopted on August 8, 2012, approved by the County of Grey on August 15, 2013, and approved by the Ontario Municipal Board on February 24, 2014. The Township Official Plan establishes a vision and guiding principles for the community and comprehensive set of policies based on the following themes:

- Natural Heritage
- Economy
- Housing and Population
- Tourism and Recreation
- Cultural Heritage
- Transportation
- Services
- Settlement Areas
- Lands Outside of Settlement Areas
- Development Review
- Implementation

1.1 Purpose of the Report

The Township initiated a review of its Official Plan in 2022, pursuant to Section 26 of the *Planning Act*, with the goal of revising its Official Plan for the community. Since 2013, when the current Township Official Plan was approved by the County of Grey, considerable legislative and policy changes have occurred. At the provincial level, this includes changes to the *Planning Act*, provincial policy statements issued under the Act, and the Niagara Escarpment Plan which came into effect in 2017. At the municipal level,

a new County of Grey Official Plan and a new Saugeen Valley, Grey Sauble, Northern Bruce Peninsula Source Protection Plan have come into effect.

The work program for the Official Plan Review encompasses four phases, which include preliminary background review and study (Phase 1), consultation and analysis (Phase 2), drafting of the Official Plan (Phase 3), and finalizing of the Official Plan (Phase 4).

As of November 2024, the project team has completed Phases 1 through 3, including preparing the draft updated Official Plan, circulating the draft updated Township Official Plan for review to internal and external stakeholders, hosting a statutory open house, preparing the final draft updated Official Plan, and presenting the final draft updated Township Official Plan to Council in a statutory public meeting.¹ However, the timing of these final steps in the work program coincided with the Province's approval of a new Provincial Planning Statement (PPS) on August 15, 2024, which came into effect on October 20, 2024.

In accordance with the legislation described above, the Official Plan Review must ensure that the Township Official Plan continues to have regard for the matters of provincial interest articulated in the *Planning Act*, is consistent with provincial policy statements issued under the Act, conforms to and does not conflict with provincial plans, such as the Niagara Escarpment Plan, conforms to the County of Grey Official Plan, and reflects local goals and priorities. As such, this supplementary background report has been prepared to highlight the new and updated policy directions of the 2024 PPS as compared to the 2020 PPS, and to recommend proposed policy directions for the draft updated Township Official Plan to be consistent with the 2024 PPS.

The remainder of this report is structured based on the relevant theme areas of the 2024 PPS, with discussion of how any new or updated policies of the 2024 PPS can be addressed in the draft updated Township Official Plan.

2.0 Updated Provincial Policy Framework

As previously discussed, the Province approved a new Provincial Planning Statement (formerly the Provincial Policy Statement, or PPS) on August 15, 2024, which came into effect on October 20, 2024. The 2024 PPS is issued under Section 3 of the *Planning Act* and applies to all decisions made in respect of the exercise of any authority that affects a planning matter made on or after October 20, 2024.

The 2024 PPS provides policy direction on matters of provincial interest related to land use planning and development and sets the policy foundation for regulating the development and use of land province-wide, helping to achieve the provincial goal of

¹ For more information regarding the background research and recommendations which informed the draft updated Township Official Plan presented to Council in the summer of 2024, refer to the Phase 1 Background Report prepared by JLR and dated July 5, 2022, and the Phase 2 Directions Report prepared by JLR and dated February 6, 2023, available on the Township's website at <https://www.georgianbluffs.ca/build-and-invest/planning/official-plan/>

meeting the needs of a fast-growing province while enhancing the quality of life for all Ontarians.

In respect of the exercise of any authority that affects a planning matter, Section 3 of the *Planning Act* requires that decisions shall be consistent with policy statements issued under the Act. Accordingly, the County and the Township must both make amendments to their respective Official Plans to ensure that both guiding documents are consistent with the newly adopted 2024 PPS. As previously noted, this supplementary background report has been prepared to highlight the new and updated policy directions of the 2024 PPS as compared to the 2020 PPS, and to recommend proposed policy directions for the draft updated Township Official Plan to achieve consistency with the 2024 PPS. The below subsections address each chapter or theme area of the 2024 PPS, with discussion of how the Township may achieve consistency with new or updated policies of the 2024 PPS while also conforming with the County Official Plan. Given that the County will be undertaking a similar conformity review of their own plan, these recommendations are framed with flexibility to minimize any further changes that may be required once future amendments are brought forward to the County Official Plan to achieve consistency with the 2024 PPS.

2.1 Building Homes, Sustaining Strong and Competitive Communities

2.1.1 Planning for People and Homes

Planning for people and homes is a central cornerstone of land use planning which ensures that as our communities grow in population and as employment industries grow, there is enough vacant land available to accommodate the development of a mix of uses which together form a complete community.

As it came into effect, the 2024 PPS replaced the 2020 PPS and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*, and therefore, the 2024 PPS features a new section of policies entitled “Planning for People and Homes” (Section 2.1) under the theme of “Building Homes, Sustaining Strong and Competitive Communities” (Chapter 2). These policies give direction to municipalities on managing population growth anticipated over a 20- to 30-year planning horizon.

Policies within Section 2.1 of the 2024 PPS require that planning authorities must base population and employment growth forecasts on the Province’s population projections published by the Ministry of Finance and must ensure that at the time of updating an official plan, sufficient land is made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, as informed by provincial guidance. As with the 2020 PPS, the 2024 PPS requires that planning authorities must provide for an appropriate range and mix of housing options and densities required to meet projected needs of current and future residents of the regional market area, directing specifically that planning authorities must:

- maintain at all times the ability to accommodate residential growth for a minimum of 15 years lands which are designated and available for residential development; and
- maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned including units in draft approved and or registered plans.

The County of Grey's Growth Management Strategy² (County GMS) was last updated in 2021 and forms the basis to support the updated growth projections in the County of Grey Official Plan and accordingly, the updated growth projections in the most recent draft update to the Township Official Plan. With the new 2024 PPS policies described above, the population and employment forecasts in the draft updated Township Official Plan must instead be prepared in accordance with the population and employment growth forecasts published by the Ministry of Finance,³ rather than those prepared by the County as was initially proposed in the draft updated Township Official Plan.

The housing and population projections of the County Official Plan estimate a permanent population increase of approximately 1,570 new residents for the Township, resulting in a total population of approximately 12,780 for the Township by the year 2046. Based on this, it was estimated that approximately 700 new permanent housing units would be needed to accommodate the anticipated population growth.

Using the population projections published by the Ontario Ministry of Finance for the County and utilizing a proportional share approach⁴ to estimate the Township's projected population, it is estimated that by the year 2046, the Township's population will grow from a population of 11,100 (as of the 2021 Census)⁵ to a population of approximately 16,244, assuming a consistent 11.2% share of the County's projected population to 2046. This would represent a population increase of approximately 5,144 new residents in the Township between 2021 and 2046, or an increase of 46.4% from the Township's population as of the 2021 Census. Applying the average household size of 2.3 persons per household (as of the 2021 Census), this population growth would necessitate approximately 2,200 new permanent housing units to accommodate the population growth anticipated by the Ontario Ministry of Finance, as compared to the estimated 700 new permanent housing units anticipated by the County of Grey's 2021 Growth Management Strategy.

² County of Grey. (2021). *Growth Management Strategy*. Retrieved from <https://www.grey.ca/government/strategic-planning-and-studies/growth-management-strategy>

³ Ontario Ministry of Finance. (2024). *Ontario population projections*. Retrieved from <https://www.ontario.ca/page/ontario-population-projections>

⁴ A proportional share approach examines the Township's population from Censuses in 2006, 2011, 2016, and 2021 as a proportion of the County's population in each of those years and identifies the average of these proportions to apply to the projections for the County's population as an estimate of the projected population of the Township.

⁵ Statistics Canada. (2023). *Census Profile, 2021 Census of Population*. Retrieved from <https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/index.cfm?Lang=E>

As of the time of writing, the County is in the process of updating their Growth Management Strategy to reflect the Province's population projections published by the Ministry of Finance and consider the appropriate allocations of population and housing growth for each local municipality within the County. Given that this work is ongoing, it is recommended that the draft updated Township Official Plan remove the population and housing projections as per the most recent iteration of the County's Growth Management Strategy, and instead include a dynamic link to policy in the County Official Plan. As such, when the population and housing growth projections for each local municipality are updated in a future iteration of the County's Growth Management Strategy, and subsequently reflected in the County Official Plan in a future housekeeping amendment, the draft updated Township Official Plan will not require further amendment to conform.

That said, once there is more certainty as to the growth that can be anticipated in the Township over the next 25 years, the Township will need to carefully re-evaluate its vacant land supply and its capacity to provide municipal services necessary to accommodate the projected growth in population and employment over the long term (e.g., infrastructure and public service facilities, as discussed further in Section 2 of this report, among other considerations). Considering how land use planning is intricately linked to growth management, without a firm grasp on the growth scenario that is anticipated for the Township over the next 25 years, it is difficult to recommend which approach the Township should take to make the best use of its available resources, including its supply of vacant land and the infrastructure and public service facilities that are existing or planned over the lifespan of this Official Plan. Considerations may include whether there is sufficient land for future residential, commercial, industrial, and other uses which together form a complete community, whether the Township's existing and planned infrastructure will be sufficient to accommodate future development and redevelopment over the long term, the Township's approach to crafting more detailed plans to guide land use planning and development in existing or new built-up communities designated as settlement areas, the Township's approach to promoting economic development, among other considerations.

Given that these considerations all rely on the base assumptions regarding future population and employment growth in the Township over the long term, many of these questions cannot be fully answered until there is greater certainty as to the growth that is anticipated for the Township (i.e., through the County's future update to its Growth Management Strategy for the Township and neighbouring lower-tier municipalities in the County). As such, we recommend that a phased approach to policy development and implementation be undertaken. That is, that the Township first consider the steps it can take to align with the 2024 PPS while maintaining conformity with the in-effect County of Grey Official Plan, followed by additional effort to consider its approach to those various matters which are inextricably linked to growth management once information is available through the County's updated Growth Management Strategy. Where this theme arises throughout this supplemental background report, discussion will be woven into the recommendations that are presented for consideration by Township Council, Township staff, and other interested stakeholders. That is, first putting forward a draft

updated Official Plan for the Township to consider for adoption and the County to consider for formal approval, followed by an amendment to the Plan to incorporate or reflect these additional considerations that follow from the County's future update to its Growth Management Strategy, once it is complete.

2.1.2 Housing

There is ample evidence that demonstrates that affordable and attainable housing is central to achieving various economic and social outcomes. Land use planning can support these outcomes by ensuring that there is an adequate supply of land that accommodates a variety of housing options, by permitting and facilitating all forms of housing, including housing that is affordable to low- and moderate-income households, by ensuring the efficient use of land, and through effective business processes which can impact the cost of housing.

Much of the policy direction regarding housing from the 2020 PPS is retained in the 2024 PPS, though the 2024 PPS includes additional policy direction for planning authorities to coordinate land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs (Section 2.2.1 a). The 2024 PPS also includes additional policy direction for planning authorities to permit and facilitate all residential intensification, including the "development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment which results in a net increase in residential units" (Section 2.2.1 b). It is recommended that additional policy be included under Section 2.7.4 (General Housing Policies) of the draft updated Township Official Plan to elaborate upon where the Township will encourage residential intensification and infill.

In addition, the 2024 PPS introduces a revised definition of "housing options" which expands upon that provided in the 2020 PPS to speak also to laneway housing, garden suites, rooming houses, additional needs housing (replacing the earlier terminology of "special needs housing" in the 2020 PPS), multi-generational housing, student housing, farm worker housing, culturally appropriate housing, supportive, community and transitional housing, and long-term care uses. The broadening of this definition has implications for the policies of the PPS which direct planning authorities to provide for an appropriate range and mix of housing options and densities by maintaining at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development and by maintaining at all times lands with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned for residential use. By introducing these additional types of housing in the definition of what constitutes "housing options", planning authorities are directed to address these additional housing types in their assessment of residential land supply and in their policies which enable an appropriate range and mix of housing types.

That said, it is recommended that the new or updated policies proposed in the draft updated Township Official Plan already address many of these additional housing types introduced in the 2024 PPS. These changes include, among others:

- Updated general housing policies (i.e., to reflect PPS requirements for at least a three-year supply of draft approved and registered lots available for residential development and at least a 15-year supply of vacant land designated for residential purposes);
- Updated policies addressing additional residential units, in line with the as-of-right permissions established by recent amendments to the *Planning Act* and to establish permissions for additional residential units on rural residential land;
- Updated policies addressing the tools which the Township may use to secure the provision of housing that is affordable to low and moderate income households;
- New policies to encourage collaboration between the Township and the County to permit social and special needs housing in designated primary settlement areas;
- New policies which speak to the Township's support for tiny homes, whether as a primary or additional residential unit.

As such, it is recommended that no further revision to the general housing policies of the draft updated Township Official Plan is needed at this time, to be consistent with the policies of the 2024 PPS with respect to the nature of housing options that should be promoted. However, it is recommended that any policies which refer to “special needs housing” be updated to align with the new terminology of “additional needs housing” as introduced in the 2024 PPS.

Once the County has updated its Growth Management Strategy to align with the 2024 PPS, it is anticipated that the Township may need to re-evaluate its current supply of vacant residential land and determine whether it is sufficient to accommodate the projected growth, and whether alternative or supplemental policies are needed to encourage the types of residential development that are most needed to accommodate the long-term growth anticipated.

2.1.3 Settlement Areas, Settlement Area Boundary Expansions, and Strategic Growth Areas

Settlement areas are those built-up areas within a municipality where there is a concentration and mix of land uses and where growth and development are focused over the long term. In the Township, this includes the communities of Cobble Beach, Shallow Lake, Springmount, Balmy Beach, Kilsyth, Keady, Rockford, East Linton, Brooke, and the Sunset Strip, which are designated as primary or secondary settlement areas in the County Official Plan and the Township Official Plan. Refer to Figure 1 for an

excerpt of Schedule A to the draft updated Township Official Plan for a visual representation of these primary and secondary settlement areas.

The 2024 PPS includes some substantial revisions to the 2020 PPS policies regarding how municipalities should plan for growth and development in designated settlement areas, including the following new or revised directions of the 2024 PPS which are of relevance to the draft updated Township Official Plan:

- Updated policies which encourage growth within settlement areas to “strategic growth areas” defined as areas within settlement areas, nodes, corridors, and other areas that have been identified by municipalities to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form, including existing and emerging downtowns, lands in close proximity to areas where growth or development will be focused, that may include infill, redevelopment (e.g., underutilized shopping malls and plazas), brownfield sites, the expansion or conversion of existing buildings, or greyfields, as well as lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors.
- Encouraging planning authorities to establish density targets for designated growth areas based on local conditions.
- Permitting planning authorities to identify a new settlement area or allowing a settlement area boundary expansion outside of a municipal comprehensive review, and prescribing criteria for consideration of such new settlement areas or settlement area boundary expansions.
- Encouraging planning authorities to support the achievement of complete communities, a range and mix of housing options, intensification, and more mixed-use development in strategic growth areas (i.e., by planning strategic growth areas to accommodate significant population and employment growth, as focal areas for education, commercial, recreational, and cultural uses, and to support affordable, accessible, and equitable housing).
- Updating the definition of intensification to also include the reuse of underutilized shopping malls and plazas as an example of redevelopment of a site or area at a higher density than currently exists.

It is recommended that additional policy be included under Section 3.3 (General Policies for All Settlement Areas) of the Township Official Plan which specifically encourage growth within identified strategic growth areas and that a definition be included for strategic growth areas in Section 7 (Definitions) which is adapted from the 2024 PPS. To aid in implementing this policy direction, it is recommended that the draft updated Township Official Plan include a dynamic link to policy in the County Official Plan and its accompanying land use schedules as to the identification and designation of any strategic growth areas in the Township. In addition, it is recommended that Section 3.4.2 (Village Centre) of the Township Official Plan also include updated policy which promotes the redevelopment and intensification of vacant or underutilized commercial spaces for commercial and accessory residential use. It is further recommended that

additional policy be included within Section 3.3 (General Policies for All Settlement Areas) of the draft updated Township Official Plan to specifically address the Township's commitment to the development of complete communities in line with the policy direction of the 2024 PPS. Accordingly, it is recommended that a new definition for "complete community" be included within Section 7 (Definitions) of the draft updated Township Official Plan which is adapted from that of the 2024 PPS.

Concerning residential development in designated settlement areas, the draft updated Township Official Plan already prescribes a minimum density target of 20 units per net hectare for new development in the Primary Settlement Area in accordance with the direction of the 2024 PPS to encourage such density targets for designated growth areas. Therefore, no further changes are recommended.

Regarding the Township's approach to designating future settlement areas or refining the boundaries of existing settlement areas, it is recommended that a new subsection be added to the draft updated Township Official Plan under Section 6 (Implementation) which includes policies regarding the process by which the Township will permit the establishment of new settlement areas or permit existing settlement area boundaries to be expanded in accordance with the criteria prescribed by the 2024 PPS. It is further recommended that existing policy under Section 3.3 (General Policies for All Settlement Areas) of the Township Official Plan be revised to make explicit reference to the criteria by which expansions to settlement areas may be permitted in accordance with the criteria prescribed by the 2024 PPS. Given that the 2024 PPS permits the establishment of new settlement areas or the expansion of existing settlement areas outside of a municipal comprehensive review, it is recommended that the Township develop an application process to address privately initiated requests for the establishment of new settlement areas or the expansion of existing settlement areas, further outlining the technical studies that may be required to accompany such privately-initiated requests (i.e., in Section 3.3 [General Policies for All Settlement Areas] and Section 5.4 [Technical Studies and Reports] of the draft updated Township Official Plan).

Once the updated County Growth Management Strategy is in effect, it is anticipated that the Township may need to re-evaluate its approach to designating primary and secondary settlement areas within the Township where the majority of growth and development will be directed. Among other considerations, this will include careful reflection as to the infrastructure and public service facilities which are planned or available to accommodate future growth and development in each of these built-up communities, and more specifically, the Township's approach to capital spending and asset management over the long term to ensure that sufficient infrastructure and public service facilities are planned and available over the next 20 to 30 years. Moreover, depending upon the growth scenario that is anticipated for the Township over the long term, Township Council and staff may consider developing more detailed policy frameworks (i.e., secondary plans) to guide land use planning and development in primary and secondary settlement areas where it makes the most sense to direct investment in municipal services.

New and Updated Policy Directions in the 2024 Provincial Planning Statement
 Township of Georgian Bluffs Comprehensive Official Plan Review

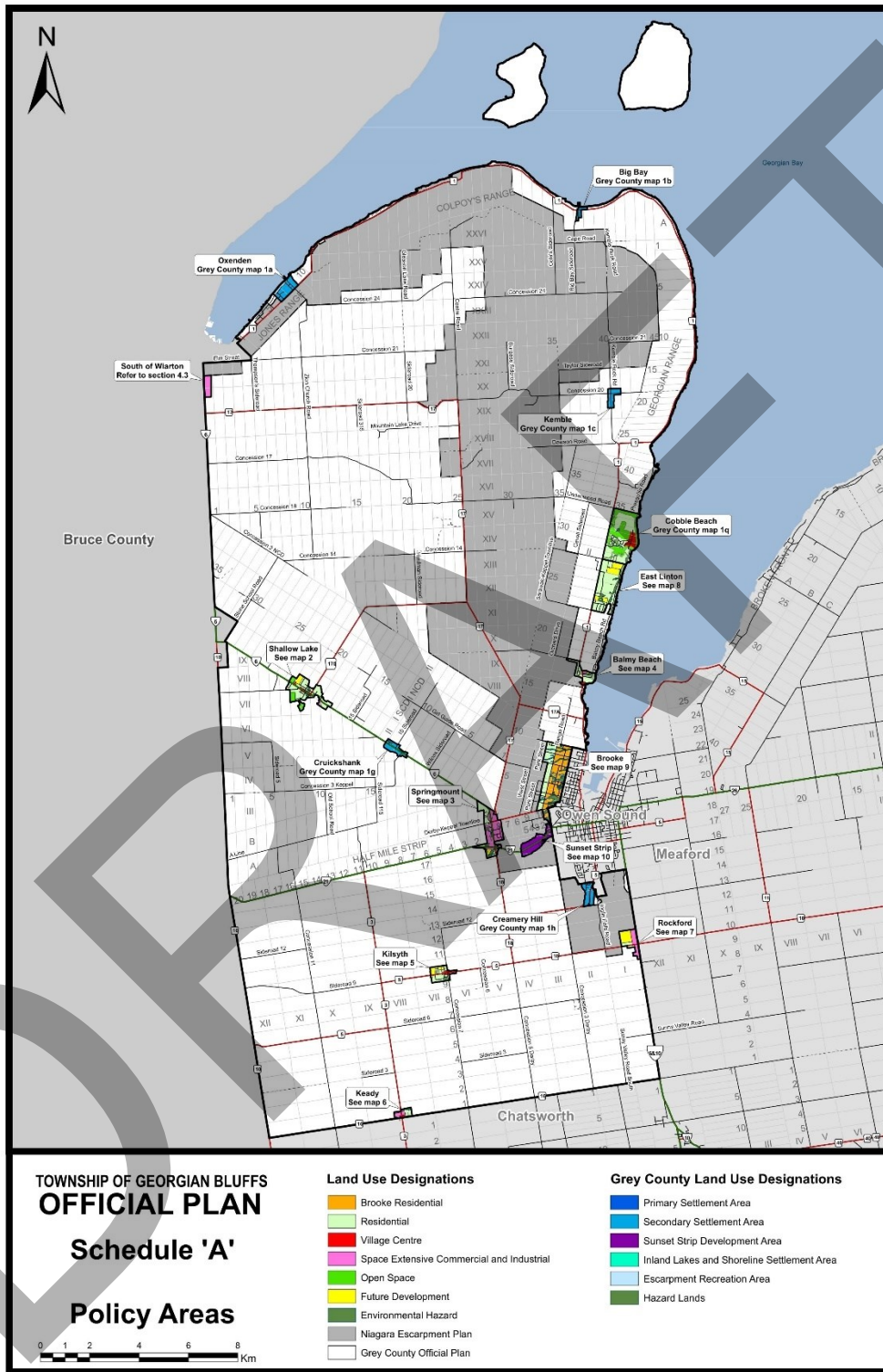


Figure 1 Excerpt of Schedule A to the draft updated Township Official Plan, showing the land use designations which apply to lands within the Township.

2.1.4 Rural Areas and Rural Lands in Municipalities

Much of the Township's geography consists of rural lands outside of designated settlement areas or built-up communities, both along the shoreline of Georgian Bay and in land. The Province prescribes policy direction which guides how municipalities may plan for limited growth and development in rural settlement areas and on rural lands outside of built-up communities, which in turn informs local land use planning and development in these areas.

Much of the policy direction of the 2020 PPS with respect to rural areas and rural lands is retained in the 2024 PPS, though there are some key changes which are relevant to address in the draft updated Township Official Plan. These new or updated policy directions concerning rural areas and rural lands include:

- Encouraging planning authorities to give consideration to “locally appropriate” rural characteristics in addition to the scale of development and provision of appropriate service levels when directing development to rural settlement areas.
- Clarifying that on rural lands in municipalities (i.e., those lands outside of rural settlement areas), that recreational dwellings considered as “resource-based recreational uses” are not intended to be permanent residences.
- Permitting residential development, including lot creation, on rural lands in municipalities where site conditions are suitable for the provision of appropriate sewage and water services (i.e., as opposed to direction in the 2020 PPS for residential development which is “locally appropriate”).
- Removing policy direction for planning authorities to promote recreational, tourism, and other economic opportunities on rural lands outside of settlement areas and to retain opportunities to locate new or expanding land uses that require separation from other uses on rural lands outside of settlement areas.
- Removing policy direction for planning authorities to consider development on rural lands outside of settlement areas which is “compatible with the rural landscape” and instead promoting development which can be sustained by rural service levels.

Given that many of the changes in policy direction with respect to rural areas and rural lands in municipalities are subtle, it is recommended that the most recent draft updated Township Official Plan continues to be consistent with the 2024 PPS without any modification to policies within Section 3 (Policies for Settlement Areas) or Section 4 (Policies for Lands Outside Settlement Areas).

That said, once the County's updated Growth Management Strategy is in effect, the Township may consider re-evaluating its approach to guiding land use planning and development in rural areas and on rural lands in the Township. That is, whether policies regarding rural development require strengthening or relaxing to promote “smart growth”

in the existing built-up communities which are designated as primary or secondary settlement areas to limit their outward expansion where appropriate.⁶

2.1.5 Supporting a Modern Economy and Employment Areas

The Province recognizes the critical role of land use planning in promoting economic development and competitiveness, including in the protection of employment areas for industrial or commercial uses which are located in proximity to major goods and movement facilities and corridors.⁷ Much of the policy direction in the 2020 PPS regarding economic development is retained in the 2024 PPS with some key changes which are relevant to the Township Official Plan. These new or updated policies in the 2024 PPS which are of relevance to the Township include:

- Requiring planning authorities to promote economic development by addressing land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.
- Encouraging the location of industrial, manufacturing, and small-scale warehousing uses outside of employment areas and in strategic growth areas where they could be sited adjacent to sensitive land uses without adverse effects.
- Requiring that on lands within 300 metres of designated employment areas, development must avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the long-term economic viability of employment uses within existing or planned employment areas.
- Supplementing the policy direction of the 2020 PPS which directed planning authorities to designate, protect and plan for all employment areas in settlement areas, with specific direction as to the strategies that planning authorities must use to do so (e.g., planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities; prohibiting residential uses, commercial uses, public service facilities and other institutional uses, etc.).
- Updating criteria regarding the removal of lands from designated employment areas and further removing policy direction that formerly required that any

⁶ “Smart growth” refers to a set of principles guiding land use planning which remains highly influential in Canadian planning practice. Among other “smart growth” principles, considerations include directing growth to existing communities, preserving open space (i.e., protecting natural areas, farmland, and other sensitive environmental areas), encouraging the development of a range of housing options, encouraging collaboration between communities and stakeholders, taking advantage of compact building design, fostering a strong sense of place, designing neighbourhoods to be walkable, and making development decisions that are fair, cost effective, and predictable.

⁷ An employment area is defined by the 2024 PPS as an area designated in an Official Plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. Uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above.

removal of lands from designated employment areas only take place at the time of a municipal comprehensive review.

- Updating the definition an employment area, with an exhaustive list provided for what constitutes a “cluster of business and economic activities” and specifying uses that are excluded from employment areas (i.e., institutional and commercial, including retail and office uses not associated with a primary employment use listed).

Within the draft updated Township Official Plan, Section 3.4.3 prescribes policy related to the Space Extensive Commercial and Industrial designation of the plan, which identifies those lands within settlement areas that are appropriate for the establishment of dry commercial and industrial uses that require large parcels of land and benefit from efficient access to major transportation corridors. As shown in Schedules A-1 to A-9 of the draft updated Township Official Plan, lands designated Space Extensive Commercial and Industrial are found within the communities of Rockford, Keady, Balmy Beach, Springmount, Shallow Lake, and Brooke.⁸ In most of these communities, with the exception of Springmount, the lands within this designation are too small to be designated and protected as an “employment area” as envisioned in the 2024 PPS.

The Township, in consultation with the County, may consider whether it is appropriate to identify lands within Springmount which are currently in the Space Extensive Commercial and Industrial designation for future designation in a protected employment area. It is recommended that a new subsection of policies be added within Section 3.3 (Policies for Settlement Areas) of the draft updated Township Official Plan which includes guidance as to how the Township will identify and designate any future employment areas in accordance with direction from the 2024 PPS and the County Official Plan. It is recommended that policies in this new subsection address:

- Permitted and prohibited uses within designated employment areas;
- Protections against incompatible uses being located within proximity to designated employment areas (i.e., the establishment of an appropriate transition to adjacent non-employment areas to ensure land use compatibility);
- Protecting employment areas that are located in proximity to major goods movement facilities and corridors;
- How the Township will assess and update employment areas designated in the Official Plan to ensure the designation remains appropriate to the planned function of the employment area.

⁸ Refer to Appendix B of this report for an excerpt of Schedules A-1 (Shallow Lake Land Use), A-2 (Springmount Land Use), A-3 (Balmy Beach Land Use), A-5 (Keady Land Use), and A-6 (Rockford Land Use), where each shows the lands within the Space Extensive Commercial and Industrial designation of the draft updated Township Official Plan.

It is further recommended that new policy be included within Section 3.3 (Policies for Settlement Areas) of the draft updated Township Official Plan to also require that on lands within 300 metres of employment areas (i.e., those lands within the Space Extensive Commercial and Industrial designation of the plan), that development must avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the long-term economic viability of any employment uses which may be designated in the Township Official Plan, as demonstrated through such technical studies as may be deemed appropriate by the Township for the scale of the proposed development and the nature of the existing or planned employment use of the adjacent lands.

Furthermore, it is recommended that new policy be included in Section 3.3 (General Policies for All Settlement Areas) of the draft updated Township Official Plan to permit the location of industrial, manufacturing, and small-scale warehousing uses outside of the Space Extensive Commercial and Industrial designation where it can be demonstrated that the proposed industrial, manufacturing, and/or small-scale warehousing use would not pose any adverse effects to adjacent sensitive land uses (i.e., through a land use compatibility assessment completed by a qualified professional in accordance with provincial guidelines).

It is anticipated that more guidance on the establishment of employment areas will form part of the County's Updated Growth Management Strategy. Once the strategy is updated, the Township can re-evaluate whether it is necessary to designate one or more employment areas within existing built-up communities. Considerations will include, for example, where sufficient land is available and appropriate for employment uses (e.g., manufacturing, warehousing, goods movement, associated rail and office, and ancillary facilities), where land use compatibility concerns can be avoided, where adequate servicing is planned or available over the long term, and where lands are in proximity to major goods movement facilities and corridors.

2.1.6 Energy Conservation, Air Quality and Climate Change

Climate change refers to changes in weather patterns at local and regional levels including extreme weather events and increased climate variability as a result of human activity. The accelerated changes we are seeing in today's climate can be attributed to the release of greenhouse gases (GHGs) into the atmosphere, including, for example, carbon dioxide and methane. GHG emissions can be traced back to various facets of our day-to-day lives – from the carbon dioxide that is emitted in our personal vehicles that take us from home to work, to the fossil fuels that are burned to produce the energy (primarily heat) that our hospitals, schools, and homes use, and the methane released by organic matter in our landfills and by the livestock that feeds our communities. There is a strong connection between where and how we live, how we get around, our GHG emissions, and our ability to adapt to extreme weather and other impacts of a changing climate. Land use planning decisions have an important role to play in advancing progress in sectors which are major contributors to GHG emissions.

The 2024 PPS continues to recognize the importance of preparing for the impacts of a changing climate. However, the 2024 PPS removes much of the specific policy direction of the 2020 PPS with respect to energy conservation, air quality, and climate change, and replaces it with more general, high-level policy statements which may be adapted by planning authorities to suit their unique local contexts. For example, Section 2.9 of the 2024 PPS encourages approaches that support the achievement of compact, transit-supportive, and complete communities; that incorporate climate change considerations in planning for and the development of infrastructure and public service facilities; that promote green infrastructure, low impact development, active transportation, protect the environment and improve air quality; and that take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the impacts of a changing climate.

The draft updated Township Official Plan includes a new section of policies regarding climate change mitigation and adaptation (Section 2.12 Planning for a Changing Climate). These policies:

- Encourage the use of green infrastructure and natural asset planning;
- Commit the Township to review future climate change projections on a regular basis to inform land use and infrastructure planning;
- Allow for the Township to require the use of green infrastructure and permeable infrastructure for multiple-residential development, plans of subdivision proposing multiple units, or commercial, institutional or industrial developments;
- Allow for the Township to consider the use of sustainability features to address climate change in new developments in lieu of a parkland conveyance where no suitable lands are available for park development; and,
- Promote the design and orientation of buildings and structures which maximize energy efficiency and conservation, and which consider the mitigating effects of vegetation and green infrastructure.

Accordingly, it is recommended that the policies of the draft updated Township Official Plan, as currently drafted, are consistent with the 2024 PPS policies regarding energy conservation, air quality, and climate change. Therefore, no further changes are recommended.

2.2 Infrastructure and Facilities

2.2.1 General and Targeted Policies for Infrastructure and Public Service Facilities

Central to planning for growth and development in our communities is ensuring that the necessary infrastructure and public service facilities are in place to accommodate current and projected needs. In this context, infrastructure refers to the physical

structures that form the foundation for development, including sewage and water systems, septage treatment systems, stormwater management systems, waste management systems, electricity generation facilities, electricity transmission and distribution systems, communications/telecommunications including broadband, transit and transportation corridors and facilities, active transportation systems, oil and gas pipelines and associated facilities. Complementary to physical infrastructure are public service facilities, which can be understood as a community's social infrastructure, including land, buildings, and structures, like schools, hospitals, and community recreation facilities, which are intended to host programs provided or subsidized by a government or other organization. Public service facilities include those buildings and structures which provide social assistance, recreation, police and fire protection, health, childcare, and educational programs, including elementary, secondary, post-secondary, long-term care services, and cultural service.

The 2024 PPS introduces only minor changes to the general policies for infrastructure and public service facilities, and similarly, only minor changes to the targeted policies concerning transportation systems and infrastructure corridors; airports, rail, and marine facilities; land use compatibility; waste management; and public spaces, recreation, parks, trails, and open space, as compared to the 2020 PPS. That said, the 2024 PPS introduces more substantial changes to policies concerning sewage, water, and stormwater infrastructure, as discussed in Section 2.2.2 of this report.

Key updates in these policies of the 2024 PPS which are relevant to the draft updated Township Official Plan include:

- Encouraging public service facilities to be planned and co-located with one another along with parks and open space to promote cost-effectiveness and facilitate service integration, access to transit, and active transportation.
- Encouraging planning authorities to collaborate with school boards in considering and promoting innovative approaches in the design of schools and associated childcare facilities in strategic growth areas and other areas with a compact built form.
- Encouraging planning for infrastructure and public service facilities to be coordinated and integrated with land use planning and growth management such that planning authorities leverage the capacity of development proponents, where appropriate.
- Encouraging planning authorities to provide transportation systems which support the use of zero- and low-emission vehicles.
- Removing policy direction which promotes a land use pattern, density and mix of uses which minimizes the length and number of vehicle-trips and supports current and future use of transit and active transportation.

- Encouraging planning authorities to also provide opportunities for the development of “energy storage systems”⁹ as an example of the types of energy supply for which planning authorities are encouraged to provide opportunities.
- Updating the policies which encourage planning authorities to promote healthy, active, and inclusive communities, with revised policy language to encourage planning for the needs of persons of all ages and abilities in the distribution of publicly accessible built and natural settings for recreation.
- Expanding the definition of public service facilities to also include schools, hospitals, and community recreation facilities as key examples of buildings and structures, and to also include childcare as a key example of the types of programs which may be offered in public service facilities.
- Updated definition for what constitutes a “negative impact” when considering new development proposed on lands adjacent to existing or planned corridors and transportation facilities, specifying that negative impacts in this context means 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.

As such, it is recommended that the draft updated Township Official Plan include new or updated policies as follows:

- In Section 2.4 (Healthy Community Initiative), updating the criteria for the review of development proposals to encourage the co-location of parks and open space with public service facilities to facilitate service integration and active transportation and to encourage consideration of the needs of persons of all ages and abilities in the distribution of a full range of publicly accessible built and natural settings for recreation.
- In Section 3.4.2 (Village Centre), including additional policy to encourage the Township’s collaboration with school boards in considering and promoting innovative approaches in the design of schools and associated childcare facilities in Primary and Secondary Settlement Areas.
- In Section 2.11 (Services), including additional policy under subsection 2.11.3 (General Policies) to encourage the planning for infrastructure and public service facilities to leverage the capacity of development proponents, where appropriate.
- In Section 2.10.4 (Transportation Policies), including additional policy which encourages proponents of new development or redevelopment to dedicate a proportion of the required off-street parking spaces for electric vehicles (including the necessary charging infrastructure), and provides direction for the Zoning By-law to establish requirements for dedicated electric vehicle parking spaces for large-scale residential and non-residential development and redevelopment.

⁹ The 2024 PPS defines an energy storage system as a system or facility that captures energy produced at one time for use at a later time to reduce imbalances between energy demand and energy production, including, for example, flywheels, pumped hydro storage, hydrogen storage, fuels storage, compressed air storage, and battery storage.

- Section 2.12 (Planning for a Changing Climate) of the draft updated Township Official Plan includes new policies which enable the Township to consider the use of sustainability features, including the use of renewable energy technologies, to address climate change in new developments in lieu of parkland conveyance where no suitable lands are available for parklands. The Township may consider updating this new policy to include specific reference to energy storage systems as an example of renewable energy technologies and include a definition for “energy storage system” within Section 7 (Definitions) of the draft updated Township Official Plan which is adapted from that of the 2024 PPS.

Once the County’s Growth Management Strategy is updated, the Township may need to re-evaluate its long-term plans for asset management and capital spending to consider the infrastructure and public service facilities which may be needed to accommodate the projected growth.

2.2.2 Sewage, Water, and Stormwater

Concerning sewage, water, and stormwater infrastructure specifically, the 2024 PPS introduces some substantial changes to its policy direction which affect how the Township may plan for future growth and development in its designated settlement areas. Key updates to these policies introduced by the 2024 PPS which are of relevance to the Township Official Plan include:

- Updated policies which require that planning for sewage and water services must also ensure that services are provided in a manner which aligns with comprehensive municipal planning for these services, where applicable, and which considers opportunities to allocate, and re-allocate, if necessary, the unused system capacity of municipal water services and municipal sewage services to support efficient use of these services to meet current and projected needs for increased housing supply.
- Removing policy direction which allows for private individual on-site water and sewer services in settlement areas for infilling and minor rounding out of existing development.
- Updated policies which only permit partial services within rural settlement areas on the basis of private individual on-site water services in combination with municipal or private communal sewage services.
- Within policy regarding lot creation and sufficient reserve system capacity, removing the requirement that such determination of reserve system capacity must include treatment capacity for hauled sewage from private communal or individual on-site sewage services.
- Additional policy direction to promote planning for stormwater management which aligns with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale.

- Updating the definition for reserve sewage system capacity to make specific reference to municipal sewage services or private communal sewage services, and to update the interpretation of reserve sewage system capacity in the context of lot creation, referring instead to the approved capacity to treat and land-apply, treat and dispose of, or dispose of, hauled sewage in accordance with applicable legislation, but not by land-applying untreated, hauled sewage. This updated definition further specifies the manner in which hauled sewage can be treated, including, for example, through a sewage treatment plant, anaerobic digestion, composting, or other waste processing.
- Updating the definition of reserve water system capacity to include additional clarification that reserve water system capacity applies only to municipal water services or private communal water services, and not to individual on-site water services.

The majority of the Township's settlement areas are either privately or partially serviced, with Cobble Beach being the only settlement area where full municipal water and sewage services are available, though full municipal water and sewage services are planned for the East Linton settlement area over the horizon of the draft updated Township Official Plan. That said, for those settlement areas where partial services are currently available, including Shallow Lake, East Linton, Brooke, Oxenden, and Balmy Beach, these settlement areas are provided only with municipal water services and development occurs on the basis of private individual on-site sewage services. The new direction of the 2024 PPS is to only permit development on the basis of partial servicing in rural settlement areas where municipal sewage services are planned or available (i.e., the opposite of the partial services which are available in the communities of Shallow Lake, East Linton, Brooke, Oxenden, and Balmy Beach). As such, the policies of Section 2.11 (Services) and Section 3.3 (General Policies for All Settlement Areas) will require substantial modification in the draft updated Township Official Plan to reflect this new policy direction of the 2024 PPS.

That said, the draft updated Township Official Plan will still need to conform to the settlement area policies of the County Official Plan, which have not yet been updated to reflect this new direction of the 2024 PPS with respect to partial servicing. As such, it is recommended that the draft updated Township Official Plan include additional policies in Section 2.11 (Services) and Section 3.3 (General Policies for All Settlement Areas) which dynamically link to the County Official Plan's direction for development to occur within designated settlement areas on the basis of partial services. As such, the draft updated Township Official Plan will continue to conform with the County Official Plan in its direction for development or redevelopment to occur in designated settlement areas on the basis of partial servicing, including when the County Official Plan is updated through a future housekeeping amendment to reflect this new direction of the 2024 PPS.

Moving forward, it is recommended that the updated Township Official Plan recognize the development rights of landowners with property in these designated settlement areas where only municipal water services are available. To do so, the updated

Township Official Plan can carry forward the current plan's policies which permit minor rounding out or infill development in designated settlement areas on the basis of municipal water services and private individual on-site sewage services (specifying, however, that this would only be permitted in cases where a property was developed with a legally existing as of the date of the updated plan's adoption). For greater clarity and transparency in applying this policy moving forward, it is recommended that the updated Township Official Plan include an exact date for future consideration of what would constitute development which was legally existing as of the updated plan's adoption (i.e., the effective date based upon Township Council's adoption of the updated plan as well as the County's formal approval). Beyond these permissions which are extended to landowners with legally developed properties, it is recommended that the updated Township Official Plan must be revised to align with the PPS' direction for future development or redevelopment in designated settlement areas to occur on the basis of partial services only in limited circumstances and only where municipal sewage disposal services are planned and available.

That said, where the majority of the Township's designated settlement areas are not connected to municipal sewage disposal services, these communities will need to continue to grow and develop to accommodate the population and employment growth that is anticipated in the Township over the next 20 to 30 years. Accordingly, the Township may opt to include permissions for large-scale development and redevelopment to occur in designated settlement areas on the basis of private communal sewage disposal services (i.e., where large-scale development or redevelopment is proposed by way of plan of subdivision or plan of condominium). Key considerations in developing a policy framework to permit private communal services in these built-up communities will include, among others, the reasonable division of legal and financial responsibility between the Township and the development proponent where private communal systems are proposed. In light of the growth scenario anticipated for the Township through the County's future update to its Growth Management Strategy, the Township may opt to weigh the benefits and costs to investment in private communal servicing systems versus investment in extending full municipal water and sewage services to existing built-up communities through a phased approach over the long term (i.e., identifying priorities for the designated secondary settlement areas which are to be the focus of future growth and development, and subsequently the focus for targeted investments in water, sewage, and stormwater management infrastructure over the long term).

2.3 Wise Use and Management of Resources

2.3.1 Natural Heritage and Water Resources

Natural heritage policies in the land use planning framework intend to protect the natural environment for its ecological functions while providing for appropriate growth and development, recognizing the importance of maintaining, protecting, restoring, and where possible, improving the diversity and connectivity of natural features and areas. These features include significant wetlands, coastal wetlands, significant woodlands,

significant valley lands, significant wildlife habitat, significant areas of natural and scientific interests, fish habitat, and the habitats of endangered species and threatened species.

The Province continues to recognize the importance of land use planning tools to protect and preserve natural features and areas for the long term. The 2024 PPS introduces no substantial changes to the policies which concern the preservation and protection of natural heritage features, as compared to the 2020 PPS, except to update the references to other policies of the 2024 PPS in accordance with the new numbering of sections and subsections.

More substantial changes have been made in the 2024 PPS to the policies concerning water quality and quantity, including the following new or updated policies of relevance to the draft updated Township Official Plan:

- Removing policy direction which formerly required planning authorities to evaluate and prepare for the impacts of a changing climate to water resource systems at the watershed level.
- Removing policy direction which formerly required planning authorities to ensure that stormwater management practices minimize stormwater volumes and contaminant loads and maintain or increase the extent of vegetative and pervious surfaces.
- Encouraging municipalities to undertake watershed planning to inform planning for sewage and water services and stormwater management, including low impact development, and the protection, improvement or restoration of the quality and quantity of water. Directing upper-tier municipalities to undertake such watershed planning in partnership with lower-tier municipalities and encouraging collaboration on watershed planning with applicable conservation authorities.
- Providing a new definition for water resource systems to complement the policy direction which encourages municipalities to undertake watershed planning, which define a water resource system as “a system consisting of ground water features and areas, surface water features (including shoreline areas), natural heritage features and areas, and hydrologic functions, which are necessary for the ecological and hydrological integrity of the watershed” (Section 8, PPS 2024).
- Providing an updated definition of surface water features to also refer to permanent and intermittent streams, thereby broadening the application of policies which require planning authorities to protect, improve, or restore the quality and quantity of surface water features.

Accordingly, it is recommended that additional policy be included in Section 2.11.4 (Water Resource Management) which directs that the Township will undertake watershed planning in collaboration with the County of Grey, other lower-tier municipalities, and the Grey Sauble Conservation Authority in order to protect, improve, or restore the quality and quantity of water resources within the Township’s jurisdiction. It is also recommended that new or updated definitions be included within the draft

updated Township Official Plan to reflect those provided in the 2024 PPS which concern the protection and preservation of water quality and quantity.

As previously noted, the 2024 PPS removes policy direction which formerly required planning authorities to ensure that stormwater management practices minimize stormwater volumes and contaminant loads and maintain or increase the extent of vegetative and pervious surfaces. Section 3.6.8 of the most recent draft updated Township Official Plan includes policies which refer to this policy direction of the 2020 PPS. Despite the change in provincial guidance to remove this as a requirement, it is recommended that the Township maintain these policies in the draft updated Official Plan as best management practices for stormwater management.

As the anticipated population and employment growth for the County is realized over the long term, it will become increasingly important for the Township to have a strong policy framework in place to protect and preserve natural heritage features and areas for their ecological functions over the long term and ensure that the Township is adequately prepared to limit the sprawl of built-up communities into these natural areas.

2.3.2 Agriculture

The Township's current Official Plan recognizes the importance of the agricultural industry to the economy of Georgian Bluffs, noting that the average farm size in the Township has increased over time, while the number of farming operations within the Township has simultaneously decreased. As such, the preservation and protection of agriculturally viable lands and the enhancement of the agriculture support industry are key priorities for the Township, as noted in the current Official Plan, and affirmed in the draft updated version.

The 2024 PPS also speaks to the Province's commitment to a vibrant agricultural sector which will continue to form part of Ontario's economic prosperity and overall identity. Much of the policy direction of the 2020 PPS concerning the protection of prime agricultural land is retained in the 2024 PPS, with a few key changes. New or updated policy direction of the 2024 concerning agriculture include:

- New policy direction which requires (rather than encourages) planning authorities to use an "agricultural system"¹⁰ approach based on provincial guidance which maintains and enhances a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network.
- New policy direction which encourages planning authorities to support local food, facilitate near-urban and urban agriculture, and foster a robust agri-food network, along with a definition as to what constitutes urban agriculture - food production

¹⁰ The 2024 PPS defines an "agricultural system" as a system comprised of a group of interconnected elements that collectively create a viable, thriving agri-food sector, including both an agricultural land base comprised of prime agricultural areas and an agri-food network which includes agricultural operations, infrastructure, services, and assets important to the viability of the agri-food sector.

in settlement areas, whether it is for personal consumption, commercial sale, education, or therapy, which includes vertical agriculture facilities, community gardens, greenhouses, and rooftop gardens.

- Including “specialty crop areas” in its identification of the agricultural land base which must be designated and protected for long-term use for agriculture, in addition to prime agricultural areas.
- Further specifying that a principal dwelling associated with an agricultural operation must be permitted in prime agricultural areas as an agricultural use, except when residential use has been prohibited on the remnant farmland following a surplus farm dwelling severance.
- Requiring that planning authorities must permit up to two additional residential units where a principal dwelling associated with an agricultural operation is permitted on a lot in a prime agricultural area and specifying criteria to which such additional residential units must comply. Further specifying that such permissions for additional residential units are in addition to farm worker housing permitted as an agricultural use.
- Within the policies concerning lot creation in prime agricultural areas, further specifying that only one new residential lot per farm consolidation may be permitted for a residence surplus to an agricultural operation. Specifying also that the planning authority must also ensure that no additional residential units may be developed on the remnant farmland.
- Within the policies concerning non-agricultural uses in prime agricultural areas, directing that any impacts on the agricultural systems from any new or expanding non-agricultural uses are to be avoided, or where avoidance is not possible, minimized and mitigated, as demonstrated through an agricultural impact assessment or equivalent analysis that is based on provincial guidance.
- An updated definition for what constitutes an on-farm diversified use, which removes reference to exclusive permissions for ground-mounted solar facilities as on-farm diversified uses in prime agricultural areas, and instead includes references to electricity generation facilities and transmission systems, and energy storage systems as examples of on-farm diversified uses.
- Updated references to the new Ontario Ministry of Agriculture, and Food Agribusiness (OMAFRA) and the Ontario Ministry of Rural Affairs in place of the former Ontario Ministry of Agriculture, Food, and Rural Affairs (OMAFRA).

Accordingly, it is recommended that the draft updated Township Official Plan include new or updated policies to address some of the above matters. However, much of the above direction for agricultural uses may be more appropriately addressed through future updates to the County Official Plan as the primary land use planning document for lands outside of designated settlement areas in the Township. That said, there are sections of the draft updated Township Official Plan which will also require revision. In particular, the Plan’s policies on additional residential units and its policies on land division will require updating to reflect the new direction of the 2024 PPS regarding as-of-right permissions for additional residential units in prime agricultural areas and the

updated policies regarding surplus farm dwelling severances to reflect these as-of-right permissions.

Moreover, the Township may consider including additional policies which direct land use planning and development on lands outside of designated settlement areas for rural or agricultural uses, which distill the direction of the County Official Plan into clear direction for landowners in the Township in a manner that suits the Township's unique local context while still maintaining conformity with the County Official Plan and consistency with the 2024 PPS.

Furthermore, the Township may consider including additional policies under Section 3.4 (Land Use Designations for Settlement Areas) of the draft updated Township Official Plan which permit urban agriculture as a permitted use in the Residential designation, with corresponding policies to guide or prescribe how urban agriculture uses may be established (i.e., considering such matters as the permitted scale of the operation, requiring urban agriculture uses to be secondary to the primary residential or institutional use of a property, and any other measures that may be required to ensure the appropriateness of any proposed urban agriculture use).

It is also recommended that the draft updated Township Official Plan include additional policies under Section 2.6 (Economy) which specify that the development of non-agricultural uses in prime agricultural areas should generally be discouraged, though may be permitted where it can be demonstrated that the non-agricultural use will have no impact on the agricultural system, or, where impacts cannot be avoided, that they will be minimized or mitigated. It is recommended that such policies further specify that the determination of the impact of non-agricultural uses on the agricultural system in prime agricultural areas must be based on an agricultural impact assessment completed by a qualified professional in accordance with provincial guidance. It is recommended that a new subsection discussing the parameters of an agricultural impact assessment be included within Section 5.4 (Technical Studies and Reports) of the draft updated Township Official Plan, which refers to the definition provided in the County Official Plan.

As the anticipated population and employment growth for the County is realized over the long term, it will become increasingly important for the Township to have a strong policy framework in place to protect and preserve its supply of viable agricultural land and to ensure that the Township is adequately prepared to limit the sprawl of built-up communities into rural and agricultural areas.

2.3.3 Minerals, Petroleum, and Mineral Aggregate Resources

On the theme of the wise management and use of resources, the Province dictates policy which directs how land use planning in Ontario will protect minerals, petroleum, and mineral aggregate resources for their long-term use, and which dictate how the rehabilitation of land should occur following the termination of resource extraction activities.

Generally speaking, the 2024 PPS introduces only minor changes to the policies regarding minerals, petroleum, and mineral aggregate resources, as compared to the 2020 PPS. That said, the policies concerning extraction in prime agricultural areas in 2024 PPS cross-reference the new requirement for an agricultural impact assessment which demonstrates how any impact to the agricultural system will be avoided or where avoidance is not possible, minimized and mitigated, where non-agricultural uses are proposed in prime agricultural areas.

The 2024 PPS also refines policy direction from the 2020 PPS concerning the complete rehabilitation of prime agricultural areas following resource extraction, specifying that complete rehabilitation to an agricultural condition is not required if the depth of planned extraction makes restoration of pre-extraction agricultural capability unfeasible and agricultural rehabilitation in remaining areas is maximized.

As previously discussed, much of the policy direction regarding land use planning and development on lands outside of settlement areas comes from the County Official Plan, and therefore the above changes introduced by the 2024 PPS regarding resource extraction are best addressed by including a dynamic link to policies in the County Official Plan, which may be updated at a future date to reflect this new provincial policy direction. However, the Township may opt to refine the policy direction of the County Official Plan into a set of locally appropriate policies governing minerals and mineral aggregate resources, provided that any policies proposed in the draft updated Township Official Plan remain consistent with the 2024 PPS and in conformity with the County Official Plan.

As the anticipated population and employment growth for the County is realized over the long term, it will become increasingly important for the Township to have a strong policy framework in place to protect and preserve those mineral and mineral aggregate resources within its jurisdiction and to ensure that the Township is adequately prepared to limit the sprawl of built-up communities into areas where such resources are located.

2.3.4 Cultural Heritage and Archaeology

Cultural heritage and archaeology are the final components of the Province's policy direction regarding the wise use and management of resources. In this context, cultural heritage refers to built heritage resources, cultural heritage landscapes, and archaeological resources, with policy direction concerning each of these three prongs.

The 2024 PPS speaks to the Province's continued commitment to recognizing the unique role that Indigenous communities play in land use planning and development, and the contribution of Indigenous communities' perspectives and traditional knowledge to land use planning decisions. As compared to the 2020 PPS, the 2024 PPS provides a stronger degree of policy language in its directions regarding the protection of cultural heritage and archaeological resources. Of relevance to the draft updated Township Official Plan, updated policies of the 2024 PPS include:

- Updated policies which require the conservation of protected heritage properties and cultural heritage landscapes generally, and do not require that they be “significant” to warrant conservation.
- New policy which encourages planning authorities to develop and implement proactive strategies for conserving significant built heritage resources and cultural heritage landscapes, while retaining the existing policy direction of the 2020 PPS which encourages the development of archaeological management plans for conserving archaeological resources.
- Introducing stronger language around engagement with Indigenous communities, requiring that planning authorities must engage early with Indigenous communities and must ensure that their interests are considered when identifying, protecting and managing archaeological resources, built heritage resources, and cultural heritage landscapes.
- Updated definitions for built heritage resources and cultural heritage resources which exclude previous reference to properties designated under the *Ontario Heritage Act* or identified on local, provincial, federal, and/or international registers, thereby broadening the application of policies which affect built heritage resources and cultural heritage resources.
- Updated definition for what constitutes a heritage attribute, which relies on the term’s definition in the *Ontario Heritage Act* and refers to “the buildings and structures on the real property, the attributes of the property, buildings and structures that contribute to their cultural heritage value or interest” in relation to real property. The new definition excludes reference to a property’s built, constructed, or manufactured elements, as well as natural landforms, vegetation, water features, and its visual setting (e.g. significant views or vistas to or from a protected heritage property), thereby broadening the application of policies which make reference to heritage attributes.
- Updated definition for what constitutes a protected heritage property, which makes reference to property designated under Part IV or VI of the *Ontario Heritage Act* and a property included in an area designated as a heritage conservation district under Part V of the *Ontario Heritage Act*, in addition to the other forms of protected heritage properties previously referenced in the 2020 PPS.

Section 2.9 of the draft updated Township Official Plan contains its policies regarding cultural heritage, which are recommended to be updated to be consistent with the 2024 PPS, including:

- Removing references to “significant” as it relates to built cultural heritage resources and cultural heritage landscapes in policies throughout Section 2.9 (Cultural Heritage) of the draft updated Township Official Plan.
- Introducing new policies which may guide the Township’s efforts to collaborate and/or coordinate with the County in its future preparation of an archaeological management plan, and which may guide the Township’s future efforts to develop

and implement proactive strategies for conserving significant built heritage resources and cultural heritage landscapes.

- Updating policies which speak to consultation with First Nations and Métis communities for development proposals within areas deemed to have potential for archaeological resources in accordance with criteria and guidelines established by the Province or where First Nations or Métis communities have expressed an interest in consultation (i.e., to further specify that the Township must ensure that the interests of Indigenous communities have been considered when identifying, protecting and managing archaeological resources, built heritage resources, and cultural heritage landscapes).
- Updating definitions for cultural heritage resources, built heritage resources, and heritage attributes to align more closely with those of the 2024 PPS.

As the anticipated population and employment growth for the County is realized over the long term, it will become increasingly important for the Township to have a strong policy framework in place to protect and preserve cultural heritage resources within the Township, including archaeological resources, built heritage resources, and cultural heritage landscapes, and to ensure that the Township is adequately prepared to balance any development pressure with care and consideration for such preservation objectives.

2.4 Protecting Public Health and Safety

2.4.1 Natural Hazards

A key element of land use planning is ensuring that development does not result in risks to public health and safety and property damage or loss, by restricting development in areas that are susceptible to natural hazards such as flooding or erosion. Along the shorelines of Georgian Bay and along the shorelines of large inland lakes and river systems in the Township, hazardous lands include those affected by flooding hazards, erosion hazards, or dynamic beach hazards which make these lands unsafe for development due to naturally occurring processes.

The policies of the 2020 PPS concerning natural hazards remain largely unchanged in the 2024 PPS, though the 2024 PPS introduces new policy direction which requires that planning authorities must collaborate with conservation authorities, where they exist, to identify hazardous lands and hazardous sites and manage development in these areas, in accordance with provincial guidance.

It is recommended that Section 3.4.6.2 (Environmental Hazard Designation) of the draft updated Township Official Plan include new policy which further specifies that the identification of hazardous lands and hazardous sites by the Township through the Environmental Hazard Designation of the plan will occur through ongoing consultation and collaboration with the Grey Sauble Conservation Authority. Furthermore, it is recommended that existing policy under this section of the draft updated Township Official Plan be revised to clarify that the Township will seek and consider input from the

Grey Sauble Conservation Authority prior to approving any applications for development or redevelopment on hazardous lands and/or hazardous sites and which clarify that the Township will seek to incorporate any recommended conditions of development approval from the Grey Sauble Conservation Authority as may be necessary to manage development in these areas in accordance with provincial guidance.

2.4.2 Human Made Hazards

In order to protect public health and safety, land use planning must also give consideration to human-made hazards which arise from resource extraction uses, whether such activities are ongoing or have since been terminated.

The 2024 PPS introduces few changes to the policies of the 2020 PPS which concern human-made hazards; of relevance to the Township Official Plan, the 2024 PPS removes policy direction which formerly encouraged planning authorities to support, where feasible, on-site and local re-use of excess soil through planning and development approvals while protecting human health and the environment.

Given that the policies of the 2024 PPS regarding human-made hazards remain largely unchanged in comparison to those of the 2020 PPS, it is recommended that the draft updated Township Official Plan continues to be consistent with the 2024 PPS policies regarding human made hazards. Therefore, no further changes are recommended.

2.5 Implementation, Interpretation, and Coordination

The final sections of the 2024 PPS concern implementation, interpretation, and coordination, which direct how the policies of the PPS are intended to be put in action at the local level in collaboration between local levels of government and other stakeholders.

The policies of the 2020 PPS concerning implementation and interpretation are largely unchanged in the 2024 PPS, though updated policies in the 2024 PPS gives the Minister of Municipal Affairs and Housing greater flexibility to make decisions affecting land use planning and development which take into account considerations other than those prescribed by the 2024 PPS in order to balance government priorities. Further changes introduced in the 2024 PPS regarding implementation and interpretation which are of relevance to the draft updated Township Official Plan include:

- New policy which requires that minimum density targets must be revisited at the time of each Official Plan update to ensure the target is appropriate.
- Updated policy direction which encourages collaboration with boards and Service Managers, utilizing a coordinated, integrated and comprehensive approach when dealing with planning matters within municipalities, and across lower, single and/or upper-tier municipal boundaries. Further policy direction for collaboration amongst these stakeholders to address planning for public service facilities such as schools and associated childcare facilities and to address housing needs in

accordance with provincial housing policies and plans, including those that address homelessness.

- Strengthened policy direction regarding early engagement with Indigenous communities regarding the coordination of land use planning matters, further directing planning authorities to facilitate knowledge sharing, support consideration of Indigenous interests in land use decision-making, and support the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights.
- New policy direction to encourage that planning authorities engage the public and stakeholders early in local efforts to implement the Provincial Planning Statement, and to provide the necessary information to ensure the informed involvement of local citizens, including equity deserving groups.

It is recommended that the draft updated Township Official Plan include additional policy to address these new and updated policies of the 2024 PPS, including:

- In Section 3.3 (General Policies for All Settlement Areas), new policy which further directs the Township to regularly review the density targets established for settlement areas and updated them as needed, and at least as frequently as each comprehensive review and update to the Township Official Plan.
- Updating policies which speak to consultation with First Nations and Métis communities for development proposals within areas deemed to have potential for archaeological resources in accordance with criteria and guidelines established by the Province, within areas where natural heritage features are identified, or where First Nations or Metis have expressed an interest in consultation – i.e., specifying further that the Township will support consideration of Indigenous interests in land use decision-making and support the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights.
- In Section 2.4 (Healthy Community Initiative), including additional objectives guiding the process by which development proposals will be reviewed, to encourage efforts by the Township and proponents of development to engage the public and stakeholders early in the development review process, and to provide the necessary information to ensure the informed involvement of local citizens, including equity deserving groups.

As discussed throughout this report, it will be important for the Township to reflect on the interconnections between growth management and land use planning and development over the long term. As noted in Section 1 of this report, it is recommended that the Township take a phased approach to policy development and implementation such that the Township takes the first steps of bringing the draft updated Township Official Plan into alignment with the 2024 PPS (while maintaining conformity with the County Official Plan), followed by additional effort to reflect upon the recommendations of the County's Growth Management Strategy once it is updated and available with the most recent population and employment projections as published by the Ontario Ministry of Finance. We recommend that this be accomplished by:

1. Updating the Township's draft Official Plan to align with the recommendations of this supplementary background report.
2. Presenting the updated draft Official Plan at a statutory public meeting held before Council, in accordance with the requirements of the *Planning Act*.
3. Once Council is satisfied with the draft Official Plan and considered any comments from the public made through oral or written submissions prior to the statutory public meeting, moving to adopt the draft updated Official Plan and forward the adopted plan to the County for formal approval.
4. Collaborating with the County and/or its retained consultant as they prepare the updated Growth Management Strategy.
5. Once the updated Growth Management Strategy is in effect, putting forward a subsequent amendment to the updated Township Official Plan to reflect the considerations discussed throughout this supplementary background report.

2.5.1 Definitions

The 2024 PPS includes new and updated definitions for terms referenced throughout, which carries implications for how policies which reference these terms are implemented.

Many of the language changes in the definitions provided under the 2024 PPS are minor in nature and, for example, provide alternative wording for ease of interpretation, with little to no impacts on how policies may be interpreted which rely on these terms. That said, there are some more significant changes to other terms which impact upon how policies in the draft updated Township Official Plan may be understood and applied. These changes in how key terms are defined in the 2024 PPS are discussed in the respective sections of this report based on the policies of the draft updated Township Official which are affected.

It is recommended that Section 7 of the draft updated Township Official Plan be revised to update any of the definitions for terms in the 2024 PPS which are significantly different from those of the 2020 PPS where the new definition substantially changes how the term is used in policies throughout.

3.0 Conclusions and Next Steps

To date, Township Council and staff have put concerted effort into ensuring that the draft updated Township Official Plan achieved the policy directions of the 2020 PPS, and a further review has been undertaken to address new and updated policy directions of the 2024 Provincial Planning Statement.

This background report presents an overview of these new and updated policy directions of the 2024 PPS which replaced the 2020 PPS and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* when it came into effect on October 20, 2024. The *Planning Act* requires that, in the exercise of any authority that affects a planning

matter, that any decision of Council must be consistent with the policy statements issued under the Act and must conform, or not conflict with, provincial plans that are in effect. As such, before considering whether to adopt the draft updated Township Official Plan which was previously presented at a statutory public meeting of Council, the Township must first revise and update the draft Township Official Plan to address the new or updated policy directions of the 2024 PPS, as discussed in detail in Section 2 of this report.

Next steps in this project include revising the draft updated Township Official Plan to incorporate the recommendations of this report and presenting this updated draft of the Township Official Plan to Township and County planning staff, the public, and Township Council for their review and consideration. It is anticipated that the updated Township Official Plan will be publicly available for review in early 2025. Any comments from stakeholders at this stage will be addressed or taken into consideration in the final draft that is presented to Township Council for their endorsement. Upon Township Council's endorsement of the final draft of the updated Township Official Plan, it will be forwarded to the County for their final review and approval.

Given the timing of the County's ongoing efforts to ensure that their Official Plan is consistent with the 2024 PPS, once the updated County Official Plan is approved by County Council and the Ministry of Municipal Affairs and Housing, there may be additional work required to ensure that any new or updated policies of the County Official Plan are reflected in the updated Township Official Plan. We recommend that the Township work closely with the County through their respective Official Plan Review to ensure that the Township's interests are reflected in the updated County Official Plan when it comes into effect.

In the meantime, we recommend that the Township engage with the County on its efforts to update its Growth Management Strategy and reflect on the considerations noted in this supplementary background report where growth management is inextricably linked to the Township's land use planning over the long term.

It is important to note that where Township Council must decide on a planning matter before the Township Official Plan is updated to reflect the policy directions discussed in this report, they must still make a decision that is consistent with the newly adopted 2024 PPS.

Should you have any questions or would like any additional information regarding the content presented in this report, please contact the undersigned.

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