



Planning & Urban Design Rationale

208 Lakeshore Road East
Town of The Blue Mountains

Prepared For
Parkbridge Lifestyle Communities Inc.
c/o QuadReal Property Group

July 2026



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This Planning Rationale Report has been prepared in support of a Zoning By-law Amendment application submitted on behalf of Parkbridge Lifestyle Communities Inc. c/o QuadReal Property Group, herein referred to as “Parkbridge” or the “Owner”, for their site at 208 Lakeshore Road East in the Town of Blue Mountains. The purpose of this application is to introduce a limited number of amendments to the existing site-specific zoning exception applicable to 208 Lakeshore Road East (By-law No. 2020-80).

The background of the slide features a photograph of two hands pinning a map. One hand is in the foreground, placing a red pushpin, while the other is slightly behind it. The map shows various geographical features and lines. The entire image is covered with a semi-transparent red filter. Overlaid on the left side of the image is a large white circle containing the number '1'.

1

Introduction

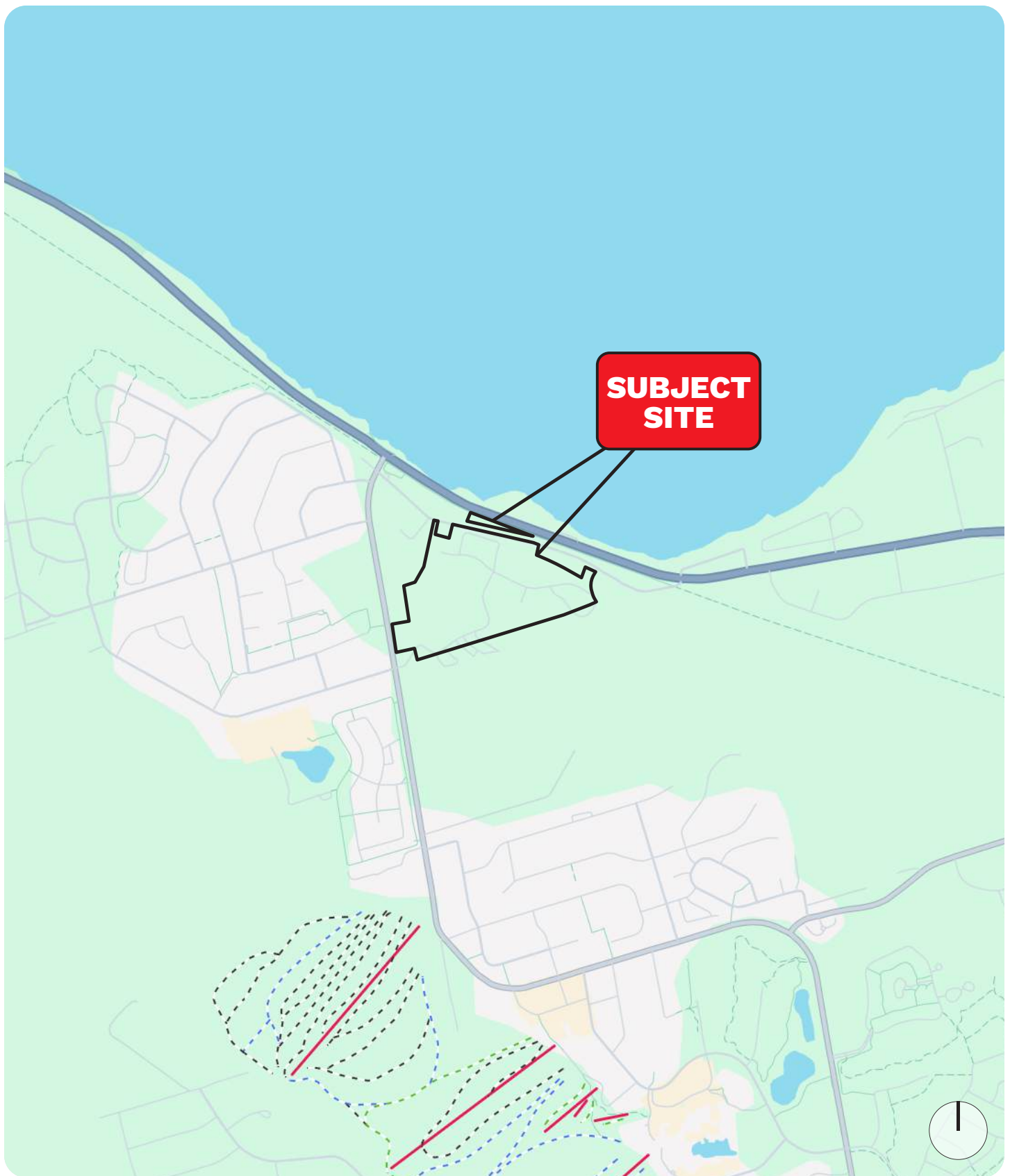


Figure 1 - Location Map

This Planning and Urban Design Rationale report has been prepared in support of an application submitted on behalf of Parkbridge Lifestyle Communities Inc. c/o QuadReal Property Group, for a Zoning By-law Amendment (the “Application”) for the lands municipally known as 208 Lakeshore Road East, in the Town of The Blue Mountains (the “Subject Site” or “Site”). The Subject Site includes two properties and encompasses a total area of approximately 27.13 ha.

The Subject Site has already been through the Planning Act approvals process to permit the development of the lands, including a site-specific zoning by-law amendment, an approved and registered plan of subdivision and an approved site plan control application.

The 27.1-hectare Site is located on the south side of Lakeshore Road East, east of Grey Road 19 in the Craighleith community of Town of The Blue Mountains (see **Figure 1**), as described in more detail in section 2 of this report. The Subject Site has been fully constructed with the infrastructure to support the development, including roads and civil services. This includes both the infrastructure to service the approved development, i.e., the Site, as well as a broader drainage network to support other approved projects

This application is only intended to make limited changes to the site-specific zoning as the Site is already zoned to permit residential uses, open spaces, and hazard lands based on the site-specific zoning by-law which was approved by the Local Planning Appeal Tribunal (“LPAT”) on January 7th, 2020. Further, the current site-specific zoning permits the development of 211 Land Lease Community Homes comprised of single detached and townhouse dwellings along with open spaces and natural features on the Site.

The limited changes to the zoning proposed through this Application are:

- removing the reference to tenure (i.e., “Land Lease Community Homes”) in the use permissions to maintain flexibility for potential forms of tenure to respond to market conditions;
- to permit two additional single detached dwellings within the Site, consistent with the density permissions in the Official Plan; and
- removing the holding provision applicable to the Site.

As noted, the Subject Site is also subject to a registered Plan of Subdivision (Plan 16M-108) which was originally approved by LPAT on April 24, 2020, subject to a set of approval conditions. The conditions of approval for the Plan of Subdivision have all been cleared by the Owner, and the Plan of Subdivision was registered in July 2026. This Application does not propose to modify the approved Plan of Subdivision.

As noted, the Subject Site is also subject to an approved Site Plan Control application which implements the approved zoning and provides the detail on site organization, built form, and the location of private roads and trails, among other matters.

This Planning Rationale report has been prepared in support of the zoning by-law amendment for the two proposed modifications to the site-specific zoning. The report provides an overview of the Subject Site and surrounding area, the proposed development, and demonstrates how the proposed development is appropriate for the Site. This report concludes that the Application conforms to the regulations of the *Planning Act*; is consistent with the policies set out in the Provincial Planning Statement; and conforms to the policies of the Niagara Escarpment Plan, the Grey County Official Plan, and the Town of The Blue Mountains Official Plan.

As discussed, the changes to the in-force zoning are limited. Our opinion is summarized below and provided in greater detail in section 5 of this report. As the development permissions are already in place, this report focuses on the limited changes that are being sought through this Application.

From a land use perspective, it is our opinion that the applicable zoning should not regulate the type of tenure of the development nor is it a requirement in the applicable planning and regulatory framework to do so. Among other matters, the purpose of a zoning by-law is to regulate the use, density, building height and setbacks that are permitted within a defined parcel or area, and not to regulate or restrict the user of that land (e.g., whether the land or dwelling is occupied by someone who owns or rents). As market conditions are driven by so many factors beyond a developer/builders' control, we understand that development can be challenged when unnecessarily being burdened explicitly by tenure.

With respect to density, the proposed modification to add two single detached dwellings conforms to the density permitted through the Official Plan for the applicable *Residential/Recreational Area* designation.

Given that all other aspects of the proposed development, including the approved limit of development, remain consistent with the LPAT-approved Zoning By-law Amendment and Plan of Subdivision and are permitted as-of-right, it is our opinion that the proposed modifications are appropriate.

Therefore, this Planning Rationale report concludes that the proposal is appropriate and desirable for the Subject Site and represents good land use planning.



Site & Surroundings

2.1 Subject Site

The Subject Site is located south of Lakeshore Road East and east of Grey Road 19 and is comprised of two properties (Parcel 1 and Parcel 2, see **Figure 2**), which have a total area of approximately 27.13 hectares. Parcel 1 is the majority of the Subject Site (26.68 hectares) and is municipally known as 208 Lakeshore Road East. It has approximately 438 metres of frontage along Lakeshore Road East and 117 metres of frontage along Grey Road 19. Parcel 2 is approximately 0.45 hectares and does not have an assigned municipal address. It is located on the north side of Lakeshore Road East, south of the Georgian Trail, is currently vacant and has approximately 280 metres of frontage on Lakeshore Road East.

With respect to topography, the Subject Site is generally flat near Lakeshore Road East and Grey Road 19 and contains steep slopes associated with the portion of the Nipissing Ridge that bisects the property from northwest to southeast in central portion of the Site. There are also three watercourses on the Site. The central of these three watercourses bisects the Site from southwest to northeast, while portions of the other two watercourses straddle the eastern and western limits of the Site. Combined, the Nipissing Ridge and central watercourse form an "X"-shaped natural hazard limit across the Site, creating four pockets of developable area within the Site.

As discussed, the developable portions have already been through the approvals process that included rezoning the land, delineating the developable areas, and designing the layout of the community through the approved site plan control application. Additional detailed design work has been approved and completed including the Site having been graded and the construction of streets, civil services, and two stormwater management facilities, as required to accommodate the proposed residential development permitted through the LPAT-approved Zoning By-law Amendment and Plan of Subdivision (discussed further in section 3 of this report). In this regard, the existing condition of the Site is that it is partially through the process of constructing the new community, with services and roads installed. A temporary sales centre is also located within the Site near its Grey Road 19 frontage.

Vehicular access to the Subject Site is provided via a private street (Burdock Way) connection from Grey Road 19. Currently, the Site can also be accessed from a driveway to Lakeshore Road East at its northwest corner which will ultimately provide an emergency-only secondary access once the residential uses are developed.



Site entrance from Grey Road 19



Northeast view from Subject Site above Nipissing Ridge



Streets and blocks developed above the ridge



Burdock Way (travelling down the ridge)



Stormwater Pond (south)



Stormwater pond (north)



Future emergency access from Lakeshore Road



Streets and blocks developed below the ridge



Western terminus of private street (Thistle Trail)



Figure 2 - Aerial - Site Context

2.2 Area Context

The Subject Site is located within Craigleith, a neighbourhood in the Town of The Blue Mountains. The Craigleith neighbourhood ("Craigleith") is generally bounded by Georgian Bay to the north, the Niagara Escarpment to the south, Wards Road to the west and Grey Road 21 to the east. Craigleith includes a mix of residential areas (permanent and seasonal), recreational resorts, ski-related uses (including the Craigleith Ski Club), and associated hotel and short-term accommodations.

With respect to built form types in Craigleith, the broader surrounding area is predominantly characterized by single-detached dwellings. Several recently approved and under construction developments in the area, including the immediate surroundings, include more compact residential typologies, including semi-detached, various forms of townhouses, and low-rise apartments, as noted in Table 1 below.

Table 1 - Development Context (Craigleith)

Development	Location	Unit Types	Unit Count (Maximum Permitted)	Status
Windfall Subdivision	Block 40, Registered Plan 16M-42, Part of Lot 16, Concession 1	Single Detached Semi Detached	659	Under construction
Eden Oaks Trail	Pt Lots 158&173, Plan 529, Part 2, RP16R-1974	Semi Detached Rowhouses Apartments	190	Under construction
Home Farms Subdivision	Part Lot 20, Concession 2	On-Street Townhouses Single Detached Semi Detached Rear Lane Townhouses	N/A	Under construction
Blue Vista	Part Lot 17, Concession 1	Single Detached Semi Detached	154	Under construction



Figure 3 - Aerial - Area Context

2.3 Immediate Surroundings

To the immediate north of the Subject Site is Lakeshore Road East, as well as a hydro-electric substation, and single detached dwellings which front onto the south side of Lakeshore Road East. On the north side of Lakeshore Road East, immediately west of Parcel 2, is the Mountain Bay Condominium Resort, which is comprised of two-storey townhouse condominium units (7–139 Lakeshore Road East), associated surface parking, an outdoor tennis court, and an outdoor swimming pool. Further north, north of Lakeshore Road East is the Georgian Trail and Highway 26. Beyond Highway 26, are residential uses consisting of one- and two-storey single-detached dwellings and three-storey townhouse dwellings that back onto Georgian Bay.



Lakeshore Road and Residential Uses on Highway 26



Mountain Bay Condominiums



North side of site adjacent to Lakeshore Road



Georgian Trail

To the immediate east of the Subject Site are 1- to 2-storey single-detached dwellings fronting onto Lakeshore Road East. Further east is approximately 17.3 hectares of land currently under construction for the Eden Oak – Blue Trails subdivision, which will include approximately 36 semi-detached dwellings, 46 townhouse dwellings, and a 112-unit apartment building.



Dwellings on Lakeshore Road East



Entrance to Eden Oak Subdivision (under construction)

To the immediate south of the Subject Site are natural hazard lands and lands currently under development. This includes forested areas within the Nipissing Ridge as well as approximately 60 hectares of land currently under construction for the Home Farms Subdivision, which will comprise of approximately 44 single-detached dwellings, 113 rear-lane townhouse dwellings, and 58 street-fronting townhouse dwellings. A Zoning By-law Amendment application (File Nos. P2067 and P3583) was submitted on May 19, 2026, to rezone Block 238 within the approved Home Farms Plan of Subdivision to permit an additional 112 townhouse dwellings. The application is currently under review by the Town.

Beyond the Home Farms Subdivision, further south, is the Tyrolean Village Resort, which comprises existing vacation rental accommodations extending southward from Tyrolean Lane to Grey Road 19.



Looking south from Site towards Blue Mountain Ski Resort



Home Farms Subdivision (under construction)

To the immediate west of the Subject Site are several single detached dwellings on the east side of Grey Road 19 as well as natural hazard lands associated with the Nipissing Ridge. Further west are existing single-detached dwellings fronting onto Schoolhouse Court and Grey Road 19, the Craigleith Community Centre (132 Lakeshore Road), and the Craighleith Heritage Depot Museum (113 Lakeshore Road East), located at the intersection of Lakeshore Road East and Grey Road 19.



Dwelling fronting on east side of Grey Road 19



Craigleith Community Centre

2.4 Transportation Context

Road Network

Lakeshore Road East is classified as a Local Road under the Town of The Blue Mountains Official Plan. Lakeshore Road East extends in an east-west direction from Grey Road 19, terminating at Highway 26. Adjacent to the Subject Site, Lakeshore Road East has an existing right-of-way width of approximately 20 metres. Within the vicinity of the Subject Site, Lakeshore Road East has a two-lane cross-section with no sidewalks.

Grey Road 19 is designated as a County Road in Grey County's road network. Grey Road 19 extends from Highway 26 running north-south for several kilometres, then running to the south and east where it then runs east-west, terminating at Grey Road 2. Adjacent to the Site, Grey Road 19 extends north from Lakeshore Road East before curving northeast toward Highway 26. Adjacent to the Subject Site, Grey Road 19 has an existing right-of-way width of approximately 30 metres. Within the vicinity of the Subject Site, the roadway has a two-lane cross-section with no sidewalks.

Although not abutting the Site but in proximity, Highway 26 is a provincial highway that follows the southern shoreline of Georgian Bay and serves as the primary east-west transportation corridor through the Town of The Blue Mountains, providing regional connectivity between Owen Sound, Collingwood, and Barrie. There are two connections to Highway 26 in proximity to the site, one to the northwest at Grey Road 19 and Highway 26 that is approximately 360 metres from the Site, which is a signalized intersection. The other is located approximately 280 metres to the east where Lakeshore Road East intersects with Highway 26 and an unsignalized intersection.

Public Transportation

The Subject Site is served by the Blue Mountain Link (BLINK) route, which forms part of the Collingwood Transit network. The BLINK route operates seven days a week, with hourly service between approximately 6:00 a.m. and 11:00 p.m. The nearest transit stop is located approximately 70 metres from the Subject Site on the south side of Lakeshore Road East. The route provides transit service between the Collingwood Terminal and Blue Mountain Village, connecting the Town of Collingwood with the Blue Mountain Resort area.

A hand holding a white marker points to a detailed city planning map. The map shows various urban layouts, including residential blocks, green spaces, and water features. Labels on the map include 'High Income Housing', 'Medium Income Housing', and 'High to Medium Income Housing'. A large white circle with the number '3' is overlaid on the left side of the image.

3

Proposal

3.1 Application History

As discussed, permission for development on the Subject Site has already been secured through several approvals based on applications submitted starting in 2016.

The Owner submitted applications for Zoning By-law Amendment and Draft Plan of Subdivision in 2016. Applications for Site Plan Approval and Part Lot Control were also submitted in 2016. These applications were supported by several technical reports and plans, including but not limited to:

- Stage 1 and 2 Archaeological Assessment
- Preliminary Stage 3 and 4 Archaeological Assessments
- Environmental Impact Study
- Functional Servicing and Stormwater Management Report
- Traffic Impact Study
- Planning Justification Report
- Concept Site Plan
- Draft Plan of Subdivision
- Architectural Drawing Set
- Geomorphological Assessment
- Vegetation Protection Plan
- Slope Stability Assessment
- Geotechnical Report
- Phasing Plan

The Town of The Blue Mountains approved the rezoning application on July 16, 2018, and Grey County approved the Draft Plan of Subdivision on September 18, 2018.

On August 3, 2018, both approved applications were appealed to the LPAT by a nearby landowner. On January 7, 2020, the LPAT issued a decision dismissing the third-party appeal of the Zoning By-law Amendment application and approving the Town's implementing by-law (By-law 2018-42) for the development of the Site. It can also be noted that the LPAT decision authorized the Town to submit an amendment to the Town's new Comprehensive Zoning By-law for administrative approval to translate the original implementing by-law into the language of the new Comprehensive Zoning By-law 2020-80), which was approved by the LPAT on March 30, 2020. The approved zoning is also subject to a Holding Provision which requires the Owner to execute a Subdivision Agreement, register the Plan of Subdivision, and execute a Site Plan Agreement.

On April 24, 2020, in response to a settlement among the parties, the LPAT issued a decision allowing the appeal in part and approval of the Draft Plan of Subdivision, subject to a set of conditions outlined in the decision.

The approved Zoning By-law amendment resulted in the Site being zoned for residential uses, open spaces, and hazard lands through the site-specific zoning by-law. The zoning permits development of 211 Land Lease Community Homes comprised of single detached and townhouse dwellings along with open spaces and natural features on the Site. Following approval of the plan of subdivision by the LPAT, the plan was registered (Plan of Subdivision (Plan 16M-108)). The plan was registered after the Owner cleared the conditions of approval for the Plan of Subdivision and entered into a Subdivision Agreement. The Owner and the Town executed the Subdivision Agreement on January 6, 2025, which was subsequently amended on January 27, 2026. Furthermore, in July 2026 the final Plan of Subdivision was approved and registered by Grey County. The Plan of Subdivision created a total of four blocks, including two blocks to be dedicated to the Town for a public trail. Of note, this Application does not propose to alter the Plan of Subdivision.

Approved Site Plan

The Approved Site Plan, in accordance with the approved zoning, delineates an "X"-shaped natural hazard limit based on the location of the Nipissing Ridge and watercourse running through the central portion of the Site (see **Figure 4**). As a result, development is clustered in four developable "pockets" within the Site.



3.2 Description of Proposal

This Application proposes to amend the in-force site-specific zoning exception to remove the reference to tenure (i.e., "land lease") and to permit two additional single detached dwellings within the Subject Site. As noted, a Site Plan application is approved for the Site with the execution of the Site Plan agreement pending. This proposal generally maintains the Approved Site Plan as it relates to the applicable zoning, with the exception of two additional units. A description of the proposal, including the removal of tenure from the use permissions, and the Concept Plan submitted for this Application are provided below.

Proposal to Amend Zoning to Remove Tenure

This Application proposes to remove the reference to tenure (i.e., "land lease") from the use permissions in the approved zoning exception that governs the Subject Site. This change will have no impact on the approved Plan of Subdivision or the Approved Site Plan. It will not impact how the Site is developed because it does not change anything related to layout, design, access, servicing etc. of the Subject Site. The development as envisioned by the in-force zoning by-law, by the Plan of Subdivision and as illustrated in the Approved Site Plan will not be altered as a result of this change.

Removing the reference to tenure from the zoning exception is a matter of the future ownership structure of the Site and/or dwellings (i.e. this would allow the dwellings to be sold as condominiums or leased as rental units, pending future approvals such as a plan of condominium application). The purpose of this change is to maintain flexibility in the tenure of the development. This change would allow the development to proceed, for example, as either a condominium or rental tenure, or combination of both. In this regard, Parkbridge requests this change to the zoning to ensure they are well-positioned to respond to evolving market conditions.

Concept Plan

This Application includes a Concept Plan which proposes to add two single detached dwellings above the Approved Site Plan and the approved Zoning By-law Amendment (see **Figure 5**). As detailed in section 2 of this report, most of the infrastructure to service the residential uses has already been constructed. In this regard, the only physical change proposed by this Application to what has already been approved through the Site Plan is the addition of two single detached dwellings.

The Concept Plan illustrates the areas of development, open space, and hazard lands based on the approved zoning for the Site. A breakdown of the land use is provided in **Table 2**.

Table 2 - Land Use

Land Use (as per ZBL 2018-65)		Area (ha)
	Residential (R2-122-h36)	14.05
	Open Space (OS-123)	7.26
	Hazard (H)	5.82
Total Lands		27.13

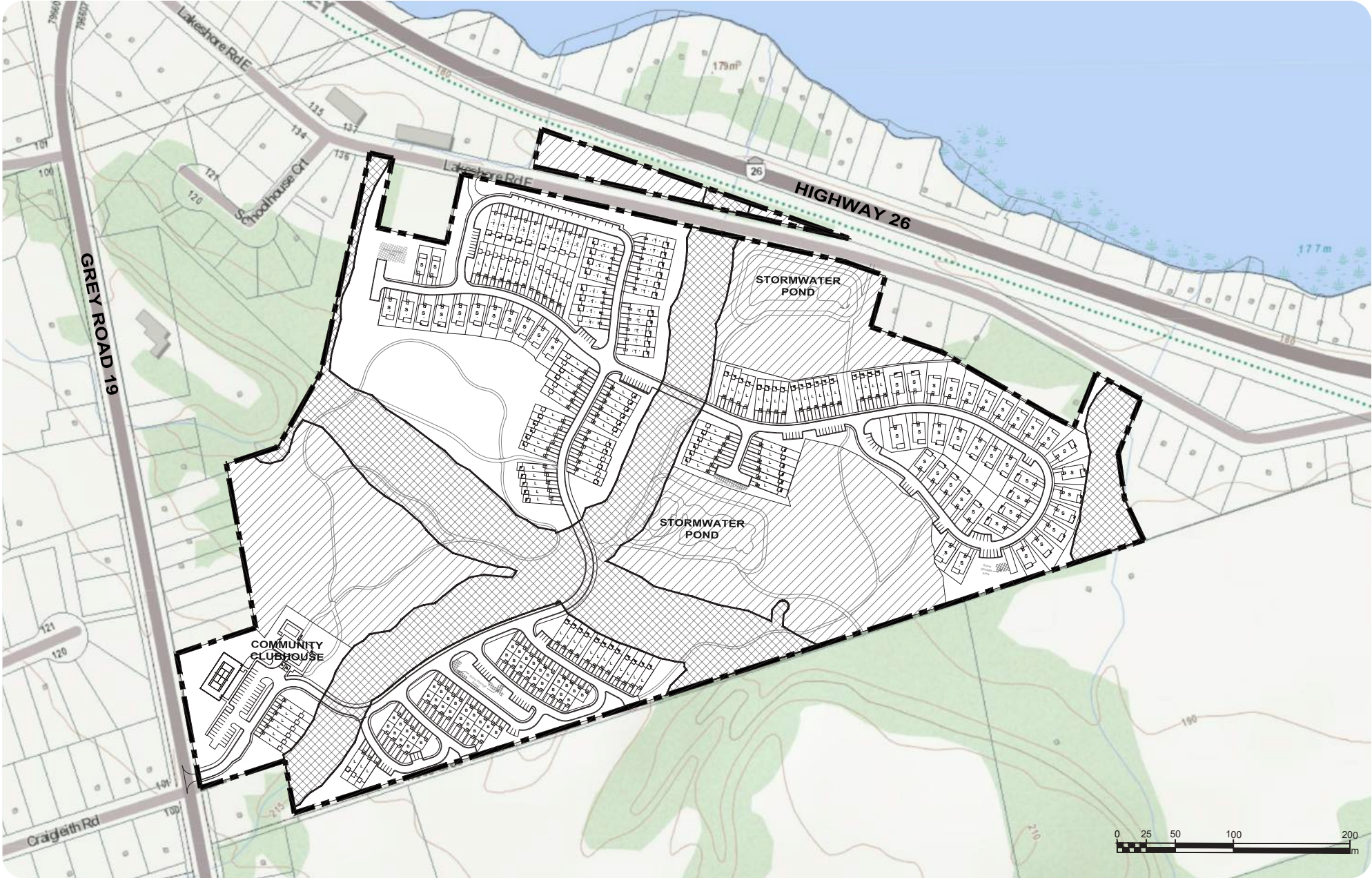


Figure 5 - Concept Plan

As noted previously, the proposed storage facility originally contemplated through the rezoning application is no longer required by the Owner for the operation of the Site. The two additional single detached dwellings would be located where the proposed storage facility had previously been contemplated, which is in the developable area below the ridge and west of the watercourse and is zoned for residential use (on the north side of Thistle Trail, see **Figure 6**). Water and sanitary servicing connections for the storage facility have been built, and it is anticipated that one of the proposed additional single detached dwellings would utilize these connections.

No other changes are proposed by the Concept Plan which would alter the Approved Site Plan.

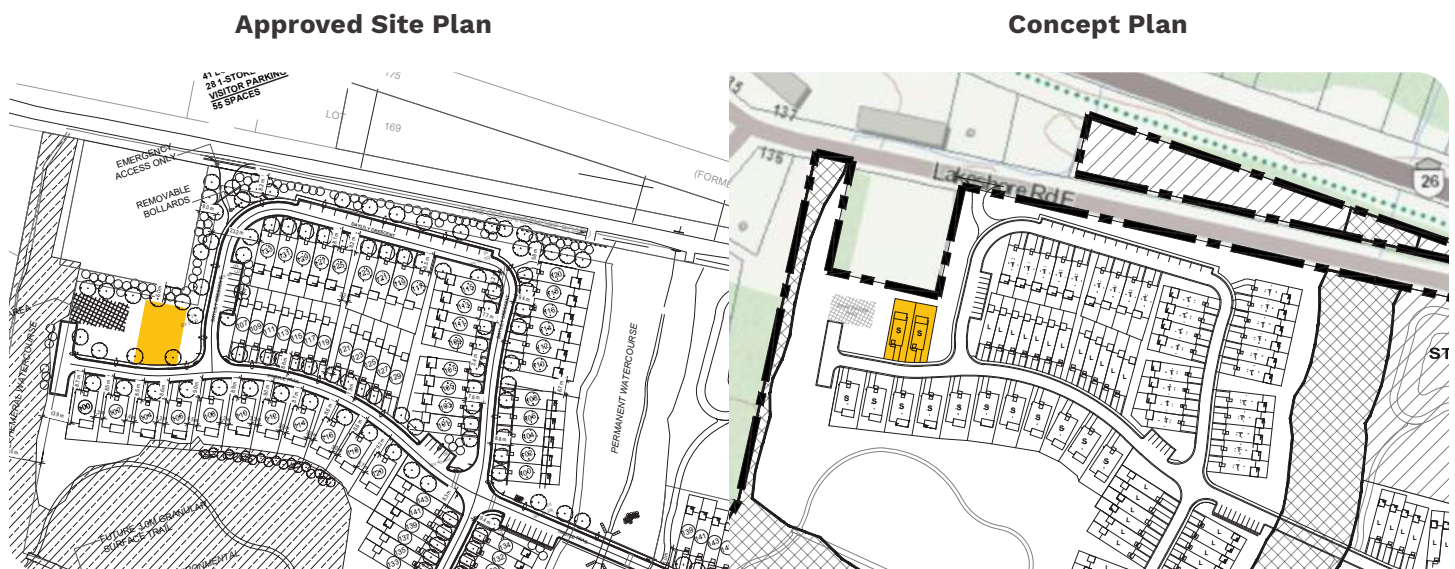


Figure 6 - Approved Site Plan & Concept Plan

Removal of Holding Provision

The in-force site-specific zoning exception is subject to a holding provision (Holding Number h36) which includes three conditions for removal:

1. Execution of a Subdivision Agreement;
2. Registration of a Plan of Subdivision; and
3. Execution of a Site Plan Agreement.

The proposal includes modifying the site-specific zoning exception to remove the holding provision in its entirety as conditions #1 and #2 have been satisfied, and condition #3 will be satisfied as the Site is subject to site plan control. This requested change to the zoning is discussed in further detail in section 5 of this report.

3.3 Key Statistics

Table 3 provides a comparison between the proposed dwellings of the Approved Site Plan and the Concept Plan proposed as part of this Application.

Table 3 - Dwelling Comparison

Dwelling Type	Approved Site Plan	Concept Plan
Single Detached	46	48 (+2)
On-street Townhouse (Loft/2-storey)	92	92 (=)
On-street Townhouse (1-storey)	28	28 (=)
Back-to-Back Townhouse	45	45 (=)
Total	211	213 (+2)

Table 4 provides a comparison between the required and proposed resident and visitor of the Concept Plan proposed as part of this Application. As detailed below, the Concept Plan conforms to the parking requirements of the zoning by-law.

Table 4 - Resident and Visitor Parking

Parking	Required based on Zoning By-law 2018-65	Provided by Concept Plan
Resident Parking	426 ⁽¹⁾	426
Visitor Parking	80 ⁽²⁾	154
Total	506	580

¹ 2 parking spaces are required per unit as per Table 5.2 of Zoning By-law 2018-65)

² 80 visitor parking spaces are required for the Site as per exception R2-122

This Application does not seek relief to any applicable parking standards, as the parking provided meets the minimum resident parking and exceeds the minimum visitor parking required by the zoning by-law.

3.4 Required Approvals

A Zoning By-law Amendment is required to modify exception R2-122-h36 in Zoning By-law 2018-65 to implement the proposal to remove the reference to tenure in the zoning by-law, to permit two additional dwellings (for a total of 213 dwellings), and to remove the holding provision.

This Application does not propose to alter any other parts of the zoning nor any part of the registered Plan of Subdivision (Plan 16M-108). As noted, a Subdivision Agreement has been executed between the Owner and the Town.

To accommodate the addition of two additional units, a minor update will be required to the Site Plan as well as the related draft agreement.



4

Policy & Regulatory Context

4.1 Overview

This section provides a review of the legislative and policy directions established by the *Planning Act*, the Provincial Planning Statement, the Grey County Official Plan, the Town of The Blue Mountains Official Plan and the applicable zoning by-law. As set out in section 5 of this report, it is our opinion that the proposed development is consistent with and conforms to the applicable policy and regulatory context outlined below.

4.2 Planning Act R.S.O 1990 C. P.13

The *Planning Act* provides the legislative framework for land use planning in Ontario. Section 1.1 establishes the purposes of the *Act*, which includes the protection of natural and cultural resources, the promotion of orderly and sustainable growth, the efficient use of infrastructure and services, the provision of housing and community facilities, and the creation of well-designed, accessible, and complete communities that support public health, safety, and environmental sustainability.

Section 2 of the *Planning Act* outlines the matters of provincial interest for which the council of a municipality, a local board, a planning board and the Tribunal shall have regard to, in carrying out their responsibilities pursuant to the legislation. Matters of provincial interest include, among others:

- the protection of ecological systems, including natural areas, features and functions (a);
- the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems (f);
- the orderly development of safe and healthy communities and the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies (h, h.1);

- the adequate provision of a full range of housing, including affordable housing (j);
- the appropriate location of growth and development (p);
- the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians (q); and,
- the promotion of built form that is well-designed, encourages a sense of place, and provides for public spaces that are of high quality, safe, accessible, attractive and vibrant (r).

Subsection 3(1) of the *Planning Act* authorizes the Minister of Municipal Affairs and Housing (the "Minister") to issue policy statements on matters relating to land use planning and development. Pursuant to Subsection 3(5) of the *Planning Act*, decisions of municipal councils and other approval authorities, including the Tribunal, that affect a planning matter must be consistent with applicable provincial policy statements in effect on the date of the decision and conform to, or not conflict with, applicable provincial plans, as the case may be.

Section 34 of the *Planning Act* establishes the authority for municipalities to enact zoning by-laws regulating the use and development of land. It also provides the legislative framework for considering applications to amend zoning by-laws and authorizes municipalities to establish standards respecting the use of land, buildings and structures, including matters such as permitted uses, building setbacks, height, density, parking, and lot coverage.

Section 34(1) outlines that Zoning By-laws may be passed by the councils of local municipalities for purposes including but not limited to:

1. Prohibiting the use of land, for or except for such purposes as may be set out in the by-law within the municipality or within any defined area or areas or abutting on any defined highway or part of a highway.
2. Prohibiting the erecting, locating or using of buildings or structures for or except for such purposes as may be set out in the by-law within the municipality or within any defined area or areas or upon land abutting on any defined highway or part of a highway.
3. Prohibiting the erection of any class or classes of buildings or structures on land that is subject to flooding or on land with steep slopes, or that is rocky, low-lying, marshy, unstable, hazardous, subject to erosion or to natural or artificial perils. Also, for prohibiting any use of land on land that is contaminated, subject to natural features and areas, or subject to significant archaeological resources.
4. Regulating the type of construction and the height, bulk, location, size, floor area, spacing, character and use of buildings or structures to be erected or located within the municipality or within any defined area or areas or upon land abutting on any defined highway or part of a highway, and the minimum frontage and depth of the parcel of land and the proportion of the area thereof that any building or structure may occupy.
5. Regulating the minimum elevation of doors, windows or other openings in buildings or structures or in any class or classes of buildings or structures to be erected or located within the municipality or within any defined area or areas of the municipality.
6. Subject to subsection (1.1) or (1.1.1), requiring the owners or occupants of buildings or structures to be erected or used for a purpose named in the by-law to provide and maintain loading or parking facilities on land that is not part of a highway.

With respect to land area, density and height, Section 34(3) provides that the authority to regulate development through zoning by-laws includes the authority to regulate the minimum area of parcels of land, as well as the minimum and maximum density and height of development within a municipality or within areas defined by the zoning by-law.

As noted previously, the zoning exception applicable to the Subject Site permits the development of 211 Land Lease Community Homes. It can be noted that Section 46(1) of the *Planning Act* defines *Land Lease Community Homes* as any dwelling that is a permanent structure where the owner of the dwelling leases the land used or intended for use as the site for the dwelling, but does not include a mobile home.

As set out in section 5 of this report, it is our opinion that the proposed amendment to the Zoning By-law, including the removal of reference to tenure in the zoning, conforms to the regulations of the *Planning Act*.

4.3 Provincial Planning Statement

The Provincial Planning Statement 2024 ("2024 PPS") provides policy direction on matters of Provincial interest related to land use planning and development and applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after October 20, 2024. In accordance with Section 3(5) of the Planning Act, all decisions that affect a planning matter are required to be consistent with the 2024 PPS. In this regard, Policy 6.1 provides that the 2024 PPS *"shall be read in its entirety and all relevant policies are to be applied to each situation"*.

Chapter 1 of the 2024 PPS sets out the Province's current vision for Ontario, emphasizing the importance of building housing to serve a fast-growing province:

"More than anything, a prosperous Ontario will see the building of more homes for all Ontarians. This is why the province has set a goal of getting at least 1.5 million homes built by 2031. Ontario will increase the supply and mix of housing options, addressing the full range of housing affordability needs. Every community will build homes that respond to changing market needs and local demand. Providing a sufficient supply with the necessary mix of housing options will support a diverse and growing population and workforce, now and for many years to come."

As per the definitions under Section 8 of the 2024 PPS, the term "housing options" refers to a range of housing types, housing arrangements and forms.

Chapter 1 further outlines the role of the Provincial Planning Statement, stating that zoning and development permit by-laws are important for the implementation of the Provincial Planning Statement. The 2024 PPS goes on to outline that Zoning and development permit by-laws should be forward-looking and facilitate opportunities for an appropriate range and mix of housing options for all Ontarians.

One of the key policy directions in the 2024 PPS is to build complete communities with a mix of housing options and promoting efficient development and land use patterns.

Policy 2.1.4 states that to provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:

- a. maintain 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
- b. 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 or registered plans.

Policy 2.1.6 provides that planning authorities should support the achievement of complete communities by, among other things, accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses, recreation, parks and open space, and other uses to meet long-term needs.

With respect to housing, Policy 2.2.1(a) provides that planning authorities shall provide for an appropriate range and mix of housing options, and densities to meet projected needs of current and future residents of the regional market area by establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households.

Policy 2.2.1(b) provides, among other matters, that this should also be done by permitting and facilitating all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents.

With respect to Implementation, Policy 6.1.6 requires that planning authorities keep their zoning by-laws up to date with their official plans and the Planning Statement by establishing permitted uses, minimum densities, heights and other development standards to accommodate growth and development. Where a planning authority must decide on a planning matter before their official plan has been updated to be consistent with the Planning Statement, or before other applicable planning instruments have been updated accordingly, Policy 6.1.7 directs that it must still make a decision that is consistent with the Provincial Planning Statement.

For the reasons set out in Section 5 of this report, it is our opinion that the requested Zoning By-law Amendment is consistent with the 2024 PPS, specifically the policies that seek to provide a range and mix of housing for all Ontarians and implement appropriate zoning standards that facilitate future growth and development.

4.4 Niagara Escarpment Plan

The Niagara Escarpment Plan (the "NEP") was established under the Niagara Escarpment Planning and Development Act and was first approved in 1985. The NEP provides the policy framework for managing development within the Niagara Escarpment Plan Area while protecting the Escarpment's natural environment, landscapes, ecological integrity, and cultural heritage resources. The current consolidated version of the NEP came into effect on June 1, 2017.

The Subject Site is located within the Niagara Escarpment Plan Area and is designated *Escarpment Recreation Area*. As identified in Section 1.8 of the NEP, the *Escarpment Recreation Area* designation applies to areas of existing or potential recreational development associated with the Escarpment and may include both seasonal and permanent residential uses. Permitted uses within the Escarpment Recreation Area include, but are not limited to, single dwellings, ski centres and associated facilities, and commercial development typically associated with ski centres or lakeshore residential areas (Policy 1.8.3).

For the reasons set out in Section 5 of this report, it is our opinion that the requested Zoning By-law Amendment conforms to the land use policies of the NEP.

4.5 Grey County Official Plan

The Grey County Official Plan (the “County OP”) provides the policy framework to guide growth and development throughout the County and was approved by the Minister, with modifications, on June 7, 2019. The County OP establishes goals, objectives and policies to manage and direct physical (land use) changes and monitor its effects on the cultural, social, economic and natural environment within the regional community.

The County OP directs growth to settlement areas where development can be efficiently serviced and encourages contextually appropriate development that supports the efficient use of land, infrastructure, and public services. In this regard, Policy 2.1 of the County OP identifies that the Town of The Blue Mountains is anticipated to accommodate continued population and household growth, with a projected permanent population of 12,310 people (5,980 households) by 2031 and 16,300 people (7,990 households) by 2046.

With respect to land use, the Subject Site is located within the *Recreational Resort Settlement Area* designation on Schedule A – Land Use Types of the County OP (Figure X). Policy 3.3 identifies that the *Recreational Resort Settlement Area* land use type applies to areas within the Town of The Blue Mountains and the Municipality of Grey Highlands that exhibit a mix of seasonal and permanent residential uses and recreational development on full municipal services. The County OP recognizes that, while these settlement areas are fully serviced, they do not contain the same range of uses as traditional urban centres or *Primary Settlement Areas*. Instead, development within the *Recreational Resort Settlement Area* is intended to be focused around a recreational component as the basis for growth.

Section 3.8 of the County OP establishes policies specific to the *Recreational Resort Settlement Area* designation. Specifically, Policy 3.8.2 requires that new development within *Recreational Resort Settlement Areas* serve the public interest by contributing to community recreational amenities, facilitating municipal servicing infrastructure, and accommodating existing unserviced development areas with development potential within the existing land use type or settlement area.

Policy 3.8.6 provides direction regarding residential development within *Recreational Resort Settlement Areas*. The policy requires municipal zoning by-laws to permit, in addition to single detached dwellings, additional residential units and a range of other housing forms, including semi-detached dwellings, townhouses, and rowhouses on these lands. The policy further directs municipalities, when updating their zoning by-laws, to provide residential zones that support a mix of residential unit types.

As outlined in Section 4.4 of this Rationale, the Subject Site is located within the Niagara Escarpment Plan.

Section 6 of the County OP establishes policies for lands within the jurisdiction of the Niagara Escarpment Plan. Specifically, Policy 6.1.2 directs that local official plans and/or secondary plans shall provide detailed land use policies and development criteria for these areas, provided such policies do not conflict with the provisions of the Niagara Escarpment Plan.

Section 9 of the County OP establishes tools for implementation of the Plan. Specifically, Policy 9.6.1 states

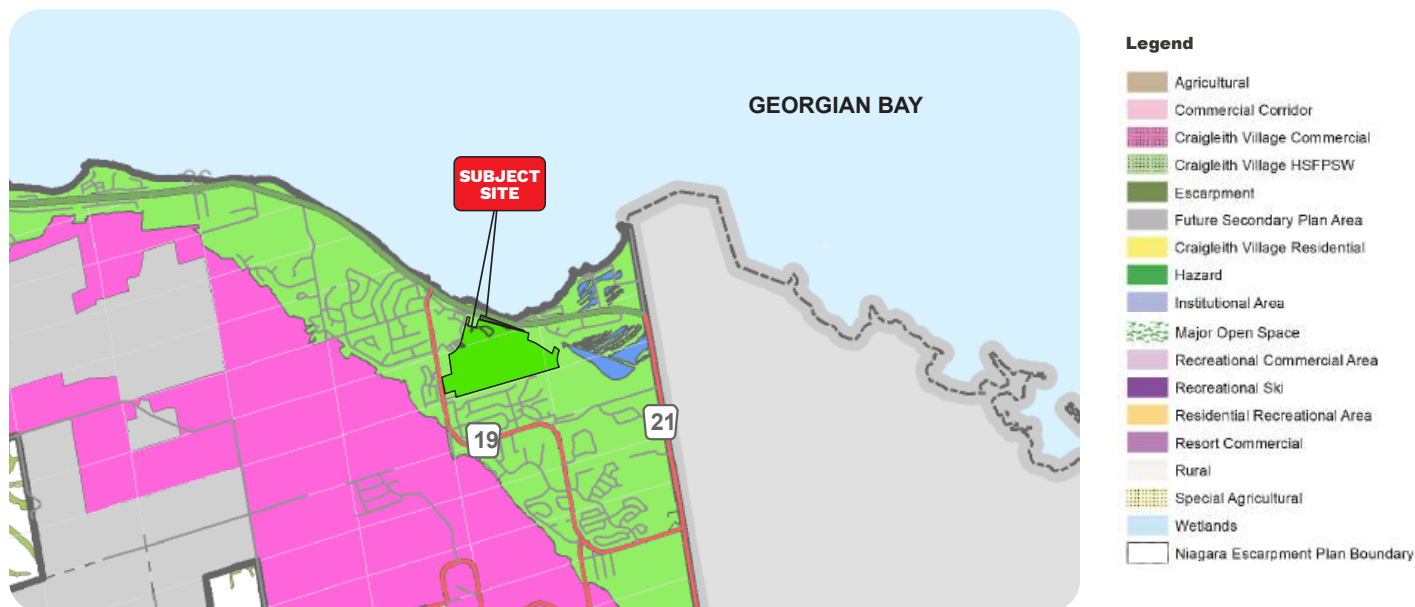


Figure 7 - Grey County Land Use Map

that local municipalities shall amend their zoning by-laws, as necessary, to implement the land use policies of the County OP, local official plans, and/or secondary plans. Policy 9.6.2 further recognizes that lands designated for development do not need to be immediately zoned to permit development and may remain in a less intensive zone on an interim basis where additional planning, servicing studies, or other development prerequisites are required.

For the reasons set out in Section 5 of this report, it is our opinion that the requested Zoning By-law Amendment conforms to the policies of the County OP, specifically the policies related to the *Recreational Resort Settlement Area designation*.

4.6 Town of The Blue Mountains Official Plan

The Town of The Blue Mountains Official Plan (the "Town OP") was adopted by Town Council in 2002 and approved by the Ontario Municipal Board (now the Ontario Land Tribunal) on September 29, 2006. The Town OP has been amended from time to time, with the most recent version updated in June 2016. The Town OP establishes the policy framework for how lands within the municipality are used and developed by setting out the Town's vision, goals, objectives, and specific policies to guide land use decisions to 2026.

The Introduction paragraph in the Town OP outlines that, in 2008, Grey County prepared a Growth Management Strategy in support of the County's Official Plan Review, through the preparation of a Growth Management Strategy Report and Growth Allocations and Issues Report. Based on the County's growth management work and 2011 Census Canada data, the Town of The Blue Mountains was anticipated to have a permanent population of 16,900 by 2026. The Introduction further states that the goals, objectives, and policies of the Town OP are intended to guide the decisions of public authorities and private interests to the year 2026. All new public works and the passage of any Zoning By-law must conform to the Town OP following its approval by Grey County. In addition, all planning decisions shall conform to the Grey County Official Plan and be consistent with the Provincial Policy Statement (now the Provincial Planning Statement).

The Subject Site is designated *Residential/Recreational Area* and *Hazard* on Schedule XX – Land Use of the Town OP (Figure XX). Policy B3.7.3 identifies a range of permitted uses within the *Residential/Recreational Area* designation, including, but not limited to, single detached dwellings, semi-detached dwellings, townhouse dwellings, and low-rise multiple unit residential developments.

Policy B3.7.4.1 establishes land use and open space requirements for lands designated *Residential/Recreational Area*. Specifically, the policy directs that development occur in a clustered, compact form, interspersed with open space areas and recreational uses. The policy further states that the majority of lots or units within a development should have direct access to public or private open space, and that all lots should have access to public open space through pedestrian walkways connected to sidewalks along roadways.

With respect to density, Policy B3.7.4.1 establishes that the maximum permitted density for lands within the *Residential/Recreational Area* designation is 10 units per gross hectare (for all areas other than the Blue Mountain Village area, including the Subject Site), with a minimum open space component of 40 percent. The policy further clarifies that lands designated *Wetland* or *Hazard* may be included within the required open space component; however, such lands are not included in the calculation of maximum permitted development density unless otherwise specifically provided for under the Plan. Policy B3.7.5 further directs that all lands designated *Residential/Recreational Area* shall be placed in appropriate zones within the implementing Zoning By-law.

"Gross Hectare" is defined by the Town OP as the total area of land in a development or plan of subdivision measured in hectares utilized for buildings, lots, public roads and widening, public parks, open space blocks, school sites and other public lands. The measurement of gross density shall not include any land designated Hazard Lands, Wetlands or Escarpment.

Policy B5.4.2 speaks to the development policies with respect to lands designated *Hazard*. Policy B5.4.2(e) states that minor alteration of Hazard Lands mapping, as interpreted by the Town, in consultation with the appropriate Conservation Authority, may occur without amendment to the Official Plan. This policy further states that it is the intent of the Town to include more detailed Hazard Land mapping in the implementing Comprehensive Zoning By-law as provided by the Conservation Authorities. As described in section 3 of this report, the Hazard Lands within the Site, which are associated with a portion of the Nipissing Ridge and the central watercourse, include an area of 5.82 hectares.

With respect to housing, Policy D7.3 establishes that it is the policy of the Town OP to ensure the provision of a range of housing types within the Town's settlement areas. The policy encourages new development that contributes to achieving this housing mix.

With respect to implementation, Policy E1.1 states that a review of the Town's Zoning By-laws shall be undertaken to ensure that it properly implements the policies of this Plan.

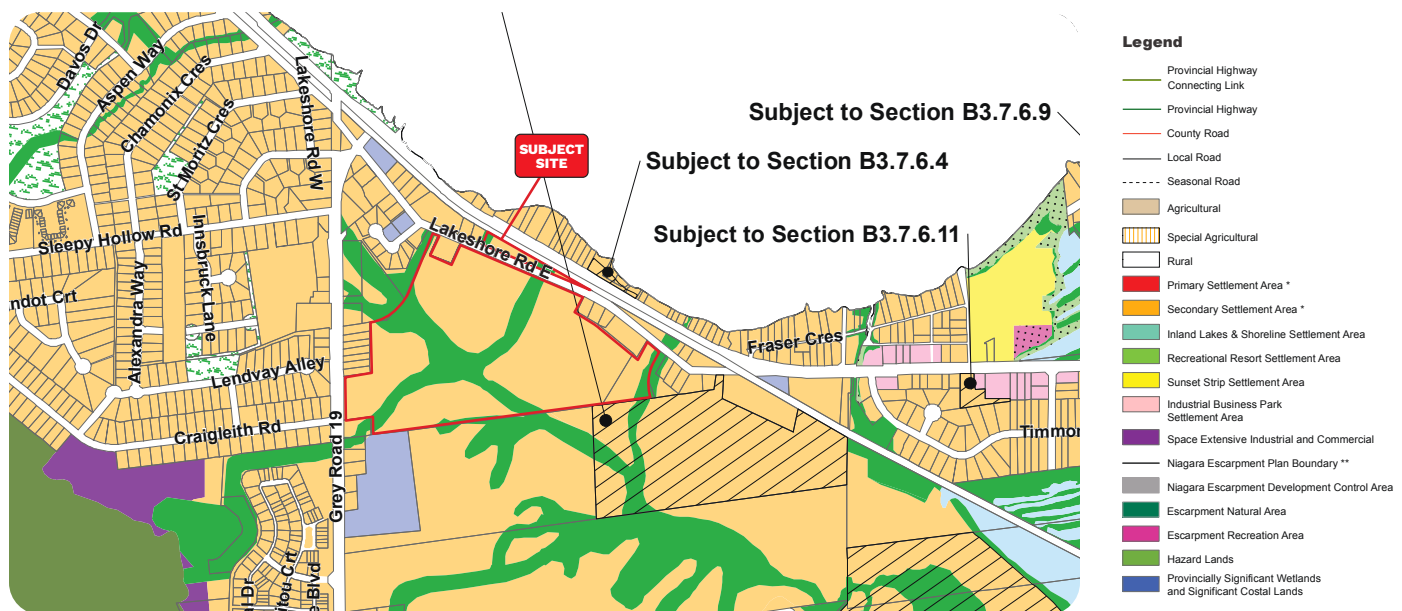


Figure 8 - The Town of The Blue Mountains Land Use Map

For the reasons set out in Section 5 of this report, it is our opinion that the requested Zoning Bylaw Amendment conforms to the policies of the Town OP, specifically as it relates to the policies of the *Residential/Recreational* Area including policies related to permitted maximum density.

4.7 Town of The Blue Mountains Official Plan Review

The *Planning Act* requires municipalities to review their Official Plans at least once every five years to ensure they remain consistent with provincial policy, conform to applicable upper-tier planning documents, and reflect current legislative requirements. In response to this requirement, the Town of The Blue Mountains undertook a comprehensive five-year review of its Official Plan. On June 23, 2025, Town Council adopted the Official Plan 5-Year Review under By-law 2025-35 (the "Council-Adopted OP"), and authorized its submission to Grey County for final approval.

On June 5, 2025, the *Protect Ontario by Building Faster and Smarter Act, 2025* (Bill 17) received Royal Assent which, amongst other things, altered the approval process for certain Official Plan Amendments. Specifically, Bill 17 introduced amendments to the *Planning Act* requiring the written approval of the Minister before municipalities may adopt certain Official Plan Amendments, including comprehensive Official Plan reviews.

In response to these legislative changes, Town staff presented a report to the Committee of the Whole on March 17, 2026, outlining the implications of Bill 17 on the County approval process for the Council-Adopted OP. The Committee subsequently directed staff to submit a request to the Minister seeking approval to proceed with the policy updates contained in the Council-Adopted OP. Accordingly, the Official Plan 5-Year Review is not in force and effect and the policies of the Town OP remain in-force. However, we have provided a review of the Council-Adopted Official Plan as it relates to the Subject Site acknowledging that it may be modified by the County and/or Minister.

The Subject Site continues to be designated *Residential/Recreational Area* in the Council-Adopted Official Plan.

The Council-Adopted OP updates the Town's growth forecasts based on the 2021 and 2022 Growth Management Strategies and the 2021 Census Canada data. The Introductory paragraph to the Council-Adopted OP projects a population of 113,440 people for Grey County by 2031, of which 12,090 people are anticipated to reside in the Town of The Blue Mountains. By 2046, the County's population is projected to increase to 127,130 people, with 16,140 people anticipated to reside in the Town of The Blue Mountains. These updated population forecasts are generally consistent with the growth projections established in the County OP, as discussed in Section 4.5 of this Rationale.

With respect to housing, the Council-Adopted OP also introduces revised guiding principles to implement the Town's vision. Specifically, Policy A1.1, Guiding Principle 4, has been updated to include direction "*to promote compact and efficient neighbourhoods with a range of housing types, price points and a mix of services that provide the necessary amenities and transportation options, and equitable access to the ingredients that make sustainable neighbourhoods.*"

Compared to the Town OP, this policy introduces new language relating to the provision of a *range of housing types and price points*, as well as *equitable access* to the elements that contribute to complete and sustainable neighbourhoods.

With respect to land use, the policies of Section B3.7 specific to the *Residential/Recreational Area* designation have also been updated. Policy B3.7.1 introduces new policy language encouraging the provision and development of a range of both seasonal and permanent dwelling types on lands designated *Residential/Recreational Areas*. In addition, the permitted uses under Policy B3.7.3 have been expanded to identify duplex dwellings, additional residential units, and apartment dwellings (subject to the policies of Section B2.16) as permitted uses within the designation.

With respect to density, Policy B3.7.4.1 states that the maximum permitted density for lands outside the Blue Mountain Village Area (including the Subject Site) continues to be 10 units per gross hectare. The requirement for a minimum open space component of 40 percent remains unchanged. The method for calculating density and open space remain unchanged in Policy B3.7.4.1.

With respect to implementation, Policy E1.1 continues to state that a review of the Town's Zoning By-law shall be undertaken to ensure that it properly implements the policies of this Plan.

4.8 Zoning By-law 2018-65

The Subject Site is zoned Residential (R2-122-h36), Hazard (H), and Open Space (OS-123) under the Town's Zoning By-Law.

The R2 Zone permits a range of residential uses, including additional residential units, duplex dwellings, home childcare, home businesses, multiple dwellings, rowhouse dwellings, semi-detached dwellings, townhouse dwellings, and triplex dwellings (Table 6.1).

As described in Section 3 of this report, Exception R2-122 was approved by the OLT and implemented by the Town through Zoning By-law Amendment 2020-80 and modifies certain provisions of the Zoning By-law to facilitate the development. Exception 122 states:

"These lands shall be used for a maximum of 211 Land Lease Community Homes comprised of a minimum 45 single detached dwellings, and a minimum of 100 horizontally attached townhouse dwellings. A maximum 465 square metre Private Clubhouse, maximum 370 square metre Private Storage Facility and uses, buildings, and structures accessory thereto are also permitted." (Our emphasis added)

Exception 122 also establishes site-specific development standards, including identifying building envelopes within the Subject Site, minimum setbacks from adjacent properties, maximum building heights, and minimum separation distances between buildings, structures, and private roads. Details of the exception are set out in Table XX.

Table 5 - Table 5 – Exception R2-122

Category	Requirement
Maximum Dwellings	211 Land Lease Community Homes
Minimum Single Detached Dwellings	45
Minimum Townhouse Dwellings	100
Maximum GFA for Private Clubhouse	465 square metres
Maximum GFA for Storage Facility	370 square metres
Minimum Setback from adjacent properties	Varies (6m to 30m)
Maximum height for Single Detached Dwelling	9.5 metres
Maximum height for Townhouse Dwelling	11.0 metres
Maximum height for Private Clubhouse	7.5 metres
Maximum height for Storage Facility	6.5 metres
Maximum height (all other buildings or structures)	4.5 metres
Minimum distance between any building or structure from a private road or any other building or structure	2.0 metres
Minimum Visitor Parking Spaces	80

The lands zoned R2-122 are also subject to Holding Provision 36 (h-36). The holding provision restricts development on the R2-122 zoned lands until such time as a Subdivision Agreement has been executed, the Plan of Subdivision has been registered, and a Site Plan Agreement has been executed. As of July 2026, the Subdivision Agreement has been executed and the Plan of Subdivision has been registered, while the draft Site Plan Agreement remains under consideration by the Owner and Town. As noted, this Application requests to remove the current holding provision as the Owner has satisfied the first two conditions of the holding provision and the Site Plan Agreement, which is the final condition, will be statutorily required to be executed prior to development of the dwellings.

Portions of the Subject Site are also zoned Hazard (H) and Open Space (OS-123). The Hazard (H) Zone applies to lands that are subject to physical or environmental constraints, including areas where development is restricted due to natural hazards. Permitted uses within the Hazard Zone include agricultural uses, conservation uses, forest management uses, existing golf courses, outdoor recreation uses, and public and private parks, all subject to the applicable provisions of the Zoning By-law (Table 8.1).

The Open Space (OS) Zone applies to lands intended to accommodate open space, recreational, and conservation-related uses. Permitted uses within the Open Space Zone include agricultural uses, base lodges, conservation uses, forest management uses, outdoor recreational uses, recreation establishments, and public and private parks, all subject to the applicable provisions of the Zoning By-law (Table 8.1).

On lands zoned OS, the site is also subject to Exception 123, which was also approved through Zoning By-law Amendment 2020-80. Exception 123 permits, in addition to the permitted uses of the Open Space Zone, a Private Recreation Use. Notwithstanding the special provisions applicable to Table 8.1, Exception 123 also permits new buildings and structures associated with an Outdoor Recreation Use, Private Recreation Use, or Private Park, each with a maximum gross floor area of 50 square metres.



Legend

Bruce Street / Marsh Street Corridor (BMC)	NEC Development Control	Residential One (R1-5)	Rural Employment (M2)	Wetland (WL)
Building Envelope	See Section 1.5	Residential Two (R2)	Extractive Industrial (M3)	Hazard (H)
Zoning h Provision Overlay				
(h1) Wetland	Residential One (R1-1)	Recreation One (REC1)	Development (D)	Parking (P)
(h2) Area of Natural and Scientific Interest (ANSI)	Residential One (R1-2)	Recreation Two (REC2)	Public Utilities (PU)	Agricultural (A)
(h3) Landfill	Residential One (R1-3)	Recreation Three (REC3)	Institutional (I)	Special Agricultural (SA)
(h4a) Source Water Protection	Residential One (R1-4)	General Employment (M1)	Open Space (OS)	
(h4b) Source Water Protection				
(h5) Sewage Treatment Plant (STP)				
177.9 GSCA Elevation (100 yr Flood Line)				

A photograph of two women in a professional setting, likely an office or design studio. They are looking down at a large-scale model of a city, which is composed of numerous white rectangular blocks of varying heights. The woman on the left is wearing a black and white striped shirt, and the woman on the right is wearing a light blue button-down shirt. The background is slightly blurred, showing office shelves and a blue wall. The entire image has a dark blue overlay.

5

Planning & Urban Design Analysis

As discussed, this Zoning By-law Amendment application is limited in scope, in that it seeks to remove reference to tenure in the zoning and to add two additional units to the Site. In this regard, the proposal does not change the land uses permitted within the Site and therefore this Application continues to conform to the land use policies of the applicable planning and regulatory framework.

5.1 Tenure

As discussed, the in-force zoning exception applicable to the Subject Site permits a maximum of 211 "Land Lease Community Homes". Land lease is a form of ownership where a home is individually purchased and owned by homebuyers but the land that the home sits on is leased to the homebuyer from the landowner or developer. While the Town's Zoning By-law does not define the term "Land Lease Community Home", the term is defined by the *Planning Act* as any dwelling that is a permanent structure where the owner of the dwelling leases the land used or intended for use as the site for the dwelling, but does include a mobile home.

As described throughout this report, this Application proposes to remove the reference to tenure (i.e., "Land Lease Community Homes") from the use permissions applicable to the Site. This change would not alter how the Site is developed, how it is experienced or how it relates to the surrounding context because it does not propose to change the use of the Site or the permitted building types. Rather, this change seeks to allow alternative forms of tenure or ownership beyond land lease. This is further reinforced by the fact that this requested modification is about ownership and does not also propose to change the registered plan of subdivision.

It is our opinion that zoning should not, nor is it intended to, regulate the tenure of the development. The inclusion of the type of tenure is not a requirement in the applicable planning and regulatory framework. This is because the purpose of a zoning by-law is to regulate the use, density, building height and setbacks that are permitted within a defined parcel or area, and not to regulate or restrict the user of that land (e.g., whether the land or dwelling is occupied by someone who owns or rents).

The requested modification would ensure there is flexibility in the potential forms of tenure for the Site in the future. Furthermore, if it was decided that the appropriate tenure for this development was condominium or freehold, there are application processes separate from zoning to address that type of ownership (i.e., draft plan of condominium, draft plan of subdivision).

Finally, there are similar types of development, in particular multi-unit residential, that have been approved in the Town of The Blue Mountains that do not include the type of tenure in their zoning exceptions to permit those developments. As noted in section 2 of this report, there are several recently approved or under construction developments in proximity to the Subject Site, each of which have a site-specific zoning exception to permit a mix of residential dwellings.

Table 6 provides the developments and their associated zoning exception. In the applicable zoning exceptions noted below, there are no references to tenure which would regulate the form of ownership of the development.

Table 6 - Development Context: Zoning

Development and Location	Unit Types and Maximum Unit Count	Official Plan Designation	Zoning Exception	By-law and Year of Original Approval
Windfall Subdivision Block 40, Registered Plan 16M-42, Part of Lot 16, Concession 1	Single Detached, Semi Detached (659)	<i>Residential Recreational Area</i>	R1-3-62 R2-62	By-law 2011-57 (2011)
Eden Oaks Trail Pt Lots 158&173, Plan 529, Part 2, RP16R-1974	Semi Detached, Rowhouses, Apartments (190)	<i>Residential Recreational Area and Hazard</i>	R2-103	(2017)
Home Farms Subdivision Part Lot 20, Concession 2	On-Street Townhouses, Single Detached, Semi Detached, Rear Lane Townhouses	<i>Residential Recreational Area and Hazard</i>	R1-125 R1-3-126 R2-127 R2-128	By-law 2020-63 (2020)
Blue Vista Part Lot 17, Concession 1	Single Detached, Semi Detached (154)	<i>Residential Recreational Area and Hazard</i>	R1-2-136	By-law 2022-55 (2022)

5.2 Density

As discussed, there are limited changes proposed through this Application. This Application proposes to add two additional dwellings in the northwest portion of the Site, on the north side of Thistle Trail where the land has been zoned for residential uses. The addition of these two units on land that is within the developable portion of the Site and zoned for residential development would bring the total number of permitted units to 213. As described below, it is our opinion that the addition of these two units is appropriate and the revised total of 213 units conforms to the maximum density permitted by the Town OP.

As noted, policy B3.7.4.1 of the Town OP sets out a maximum density of 10 units per gross hectare on lands designated Residential/Recreational Area and states that lands designated Wetlands or Hazard are not included for the purpose of calculating maximum permitted development density.

Calculation of Density for Original Applications

Through the Zoning By-law Amendment application, which was originally approved by the Town on July 16, 2018, and subsequently approved by the LPAT on January 7, 2020, Town Staff provided the calculation of density used to confirm conformity of the application to the Town's OP in Staff Report PDS.18.73 (June 25, 2018):

...The three combined properties that comprise of the Parkbridge-Craigleith lands have a total area of 27.1 ha and a gross area of 20.9 ha. (all calculations verified through the Town GIS system). The gross area includes all lands designated for development under the Official Plan and excludes all Hazard, Wetland and Escarpment lands. 211 units are proposed, and Planning Staff are satisfied that the proposed density conforms to the direction of the Official Plan...

Furthermore, through the order issued by the LPAT which establishes the final approval of the Zoning By-law Amendment, the Tribunal found that the "211 units permitted by the ZBL conforms to the Town OP". This is described in the January 7, 2020, LPAT order (PL180715) in paragraph 48 on page 17. Importantly, the LPAT's decision does not state that the 211 units proposed by the Zoning By-law Amendment is the maximum number of units that can be permitted within the Site based on the Town's OP density policies. Rather, the LPAT decision states that the 211 units permitted by the Zoning By-law conforms to the density policies of the Town OP. Therefore, this does not preclude 213 units from being permitted within the Site, provided it continues to conform to the density policies of the Town OP.

Calculation of Density for This Application

As detailed throughout this report, this Application proposes to increase the permitted number of dwellings by two additional units. Based on our calculation of permitted maximum density, a total of 213 units is permitted, which aligns with the proposal to add two additional units.

The density calculation for the Site is described below. The Subject Site has a total area of 27.13 ha and a gross Site area of 21.31 ha based on the Site containing 5.82 ha of hazard lands (total site area minus lands zoned Hazard). These areas are also shown in the submitted Concept Plan. For the purposes of this calculation, the total Site area is based on the Site Survey prepared by JD Barnes, dated XXXX, and the area of the lands zoned Hazard (H) are based on the delineation in the approved Zoning By-law Amendment Schedule (Schedule A-1 to By-law 2020-80). As a result, the maximum density calculation equates to a total of 213 units. See **Table 7**.

Table 7 - Calculation of Maximum Permitted Density

Total Site Area	27.13 hectares
Lands Zoned Hazard (H)	5.82 hectares
Gross Site Area	21.31 hectares
Maximum Permitted Density	10 units per gross hectare
Maximum Permitted Units	213 units

With respect to the original Zoning By-law Amendment, as approved by the LPAT and which permits 211 units within the Subject Site, there is no determination of a maximum unit cap based on density policies within the Town OP. It was determined that the previously proposed 211 units conformed to the density policies, and not that the proposed 211 units is the maximum permitted number of units based on the density policies.

Based on our calculation using the delineation of hazard lands within the Site established through the Zoning By-law Amendment, which is based on detailed environmental studies and approved by the LPAT, and given the applicable maximum permitted density by the Town OP, a maximum of 213 units would be permitted within the Site. Therefore, it is our opinion that the two additional units to permit a maximum of 213 units conforms to the Town OP.

Furthermore, it is our opinion that the development of the Subject Site to the permit a total of 213 units represents good planning. The Subject Site is now serviced and can accommodate the proposed incremental increase of two additional residential units to an area within the Site that is zoned for such use and part of the developable area.

5.3 Removal of the Holding Provision

This Application proposes to modify the site-specific zoning exception to remove the holding provision in its entirety.

As described in this report, the subdivision agreement has been executed and the plan of subdivision has been registered, meaning that the Owner has fulfilled conditions #1 and #2 of the applicable holding provision. Specifically, the Owner and the Town executed the Subdivision Agreement on January 6, 2025, which was subsequently amended on January 27, 2026. Furthermore, in July 2026 the final Plan of Subdivision was approved and registered by Grey County (Plan 16M-108). Furthermore, with respect to the Site Plan Agreement referenced in condition #3, we understand the agreement has been drafted and generally ready for execution. As noted, pending approval of this Application, minor updates to the Approved Site Plan and Site Plan Agreement would be required to accommodate the requested changes described above.

In this regard, the Owner has fulfilled the majority of the conditions required to remove the holding provision. The only condition that needs to be satisfied is the execution of Site Plan Agreement. Because the development would be subject to site plan control regardless of this condition, and an update to the Site Plan and execution of the Site Plan Agreement will be required prior to the construction of any dwellings within the Site, it is our opinion that this holding provision is not required to meet the intent of the condition which is to secure the Site Plan Agreement. With the first two conditions already cleared and the final condition being redundant and unnecessary, it is our opinion that the holding provision can be removed from the site-specific zoning exception.

5.4 Servicing

A Functional Servicing Report Addendum is submitted with this Application, prepared by C.F. Crozier & Associates Inc. ("Crozier"), confirming that the previously approved engineering design continues to govern the Site while supporting the addition of two units and the removal of the type of tenure from zoning. Crozier has been involved with the Subject Site since the Original Applications and has completed several studies in support of the proposed development, as outlined in the submitted FSR Addendum.

Ultimately, Crozier concludes that the requested change to remove the reference to tenure in the site-specific zoning does not result in any change to the servicing infrastructure that has been previously approved. The removal of tenure from zoning will not impact the respective ownership and maintenance of public infrastructure or private infrastructure.

Furthermore, Crozier's analysis found that the addition of two single detached dwellings can be supported from a servicing perspective.



Conclusion

This Planning Rationale Report has been prepared in support of a Zoning By-law Amendment application submitted on behalf of Parkbridge, for their site at 208 Lakeshore Road East in the Town of Blue Mountains. The purpose of this rezoning application is to introduce a limited number of amendments to the existing site-specific zoning exception applicable to 208 Lakeshore Road East (By-law No. 2020-80).

The Subject Site has already been through the Planning Act approvals to permit the development of the lands, including a site-specific zoning by-law amendment, an approved and registered plan of subdivision and an approved site plan control application.

The 27.1-hectare Site has been fully constructed with the infrastructure to support the development, including roads and civil services.

This application is only to make limited changes to the site-specific zoning as the Site is already zoned to permit residential uses, open spaces, and hazard lands based on the site-specific zoning by-law which was approved by the LPAT on January 7, 2020. Further, the site-specific zoning permits the development of 211 Land Lease Community Homes comprised of single detached and townhouse dwellings along with open spaces and natural features on the Site.

The limited changes to the zoning proposed through this Application are:

- removing the reference to tenure (i.e., "Land Lease Community Homes") in the use permissions to maintain flexibility for potential forms of tenure to respond to market conditions;
- to permit two additional single detached dwellings within the Site, consistent with the density permissions in the Official Plan. and;
- removing the holding provision applicable to the Site.

From a land use perspective, it is our opinion that the applicable zoning should not regulate the type of tenure of the development nor is it a requirement in the applicable planning and regulatory framework to do so. Among other matters, the purpose of a zoning by-law is to regulate the use, density, building height and setbacks that are permitted within a defined parcel or area, and not to regulate or restrict the user of that land (e.g., whether the land or dwelling is occupied by someone who owns or rents).

With respect to density, the proposed modification to add two single detached dwellings conforms to the density permitted through the Official Plan for the applicable *Residential/Recreational Area* designation.

Given that all other aspects of the proposed development, including the approved limit of development, remain consistent with the LPAT-approved Zoning By-law Amendment and Plan of Subdivision and are permitted as-of-right, it is our opinion that the proposed modifications are appropriate.

Therefore, this Planning Rationale report concludes that the proposal is appropriate and desirable for the Subject Site and represents good land use planning.

