

Agency and Public Comments

- 1) Niagara Escarpment Commission – July 17, 2025
- 2) Pat Kelly – October 27, 2025
- 3) Norah Toth – November 14, 2025
- 4) Historic Saugeen Metis – November 17, 2025
- 5) Saugeen Ojibway Nation – November 17, 2025
- 6) Marilyn Struthers, Social Finance & Housing Group – November 18, 2025
- 7) David McLeish – November 19, 2025
- 8) Grey County Planning and Development – November 21, 2025
- 9) Grey Sauble Conservation Authority – November 24, 2025

From: Reimer, Susan (MNR) <Susan.Reimer@ontario.ca>

Sent: July 17, 2025 10:06 AM

To: Sabine Robart <srobart@owensound.ca>

Cc: Bannister, Karen (She/Her) (MNR) <Karen.Bannister@ontario.ca>; Dobbyn, Sandy (MNR) <Sandy.Dobbyn@ontario.ca>

Subject: Re: Notice of Owen Sound - Zoning By-law Amendment, Official Plan Amendment, Urban Design Guidelines - NEC Comments

Good day,

Thank you for forwarding the notice of the Owen Sound OP/Zoning By-law Amendments and new Urban Design Guidelines for commenting. NEC staff members have reviewed the materials that were provided on-line for the Owen Sound ZBA/OPA/UDG proposed changes, and have assembled the following for your consideration:

OP Section 3.1.7.1 – Additional Residential Units (ARUs)

It is suggested to include “The policies of the Niagara Escarpment Plan (NEP) in the urban area prohibit ARUs in a detached structure”.

OP Section 4.2 Sydenham Heights Planning Area

With respect to the east end of Owen Sound, NEC staff suggest inclusion of an overall objective that maximizes open space in areas in proximity to the Escarpment and protects Escarpment views. Here are some examples:

- Escarpment Views – The view of the Niagara Escarpment from 16th Street E, 8th Street E, and Superior Street is fundamental to the image of the community. Where feasible, recognizing the proposed level of development, these views will be protected primarily through the design or the road pattern, the design and placement of buildings and structures, as key principles in the Sydenham Heights Planning Area. East/west roads shall also be designed to maximize views of the Escarpment.
- Objective - To ensure that that development in the Sydenham Heights Planning Area is sensitive to the proximity of the area to the Niagara Escarpment by maximizing open space areas and limiting the density of development adjacent to the Escarpment, protecting views of the Escarpment, and creating trail connections to the Bruce Trail in accordance with the policies of the Niagara Escarpment Plan (NEP).

OP Section 6.1.5 – re no negative impacts. Owen Sound staff may want to consider that this is creating conflict with the provincial Niagara Escarpment Plan

(NEP) in that the NEP allows for "*impacts to be minimal and where possible temporary*". The idea that there would be "no" impacts is unlikely to be possible for the construction of a substantial dwelling or any other development in a natural feature.

OP Section 6.1.6 – Lake Filling (offsetting)

It is suggested to include "*Within the Niagara Escarpment Plan (NEP) areas, offsetting is not permitted.*"

It is also suggested to add the Niagara Escarpment Plan (NEP) in the list of policies that need to be complied with.

OP Section 7.1.4 Cultural Heritage Landscapes

NEC staff wish to note our interest in mitigation of impacts on the Escarpment's natural environment and scenic resources, and suggest incorporation of policies that speak to **Scenery/Views** such as:

- On lands in or abutting the Niagara Escarpment Plan (NEP) Area, the visual impact of the proposed development in relation to the Escarpment shall be minimized to the satisfaction of the City and the NEC.
- To the extent possible, development shall ensure that the relationship to the Escarpment, a key feature which distinguishes Owen Sound, is enhanced and strengthened through the maintenance of views to the Escarpment.
- Views and Vistas – The impact of buildings and structures in relation to views of the Escarpment must be carefully considered. For development in the Niagara Escarpment Plan (NEP) Area, the building location, orientation, height, and massing will need to be supported by a visual impact assessment to the satisfaction of the Niagara Escarpment Commission and the City.

Zoning By-law

It was noted that the ZBA refers to Development Control and the requirement for a NEC Development Permit but does not mention the overall provincial Niagara Escarpment Plan (NEP) and that development on all NEP lands is subject to the policies of the NEP.

Urban Design Guidelines

It was noted that the UDG considers culture and heritage, the waterfront, river, and harbour; however no mention of the Escarpment and very limited mention of the natural setting. This may be a good opportunity to celebrate the Escarpment

as a unique, defining feature of the City. It is a UNESCO World Biosphere Reserve and a valuable scenic and natural resource within and surrounding the City. Consideration of guidelines that address the Escarpment and its natural scenery, particularly for the Sydenham Heights Planning Area is suggested, such as:

- Identify and consider views and the visual prominence of the Niagara Escarpment. New construction or infill development should not obstruct or detract from this feature.
- Where sites are in proximity to the Niagara Escarpment, building location and orientation should maintain view corridors that enhance visual access to the Escarpment.
- Where sites are in proximity to the Niagara Escarpment, building height and massing should not obstruct or detract from this feature.

The above examples were inspired by some policies of the Milton OP, but other municipal OPs also feature the Escarpment such as Hamilton, Grimsby, St Catharines, etc.

Please don't hesitate to email Karen, Sandy or myself with respect to the above suggested changes.

Best regards,

Susan Reimer, R.P.P.

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Subject: Request for Clarification, Transparency, and Resident Input —
Official Plan Amendment No. 14

To: Mayor Ian Boddy, Members of Council

Cc: Briana Bloomfield, City Clerk; Sabine Robart, Manager of Planning and
Heritage; Staci Landry, Deputy Clerk

From: Pat Kelly, Owen Sound resident

Date: October 27, 2025

Dear Mayor Boddy and Members of Council,

Please confirm that the **Special Meeting on Monday, November 24 at 3:00 p.m.** to consider **Official Plan Amendment No. 14** will include **meaningful public participation opportunities** and **transparent release of all supporting documents** in advance.

As an active resident participant in the *Vision 2050* process and a member of several citizen-led engagement initiatives, I have three immediate concerns:

1. **Timing and Accessibility**

- A 3 p.m. weekday meeting effectively excludes working residents, students, and seniors who rely on transit or caregiving schedules.
- Please advise whether the City will provide **evening or weekend engagement options** or at minimum **recorded Q&A segments** for those unable to attend live.

2. **Substantive Changes to Vision 2050 Priorities**

- The notice refers broadly to “revisions and updates” to policies on *land use, parkland, employment areas, affordable housing*, and “various housekeeping matters.”
- Residents deserve to know which of the **Vision 2050 recommendations** are being altered, deferred, or deleted. Please release a **redlined comparison** of current and proposed policy language so that community volunteers can assess impacts before the statutory meeting.

3. **Continuity and Public Trust**

- After two years of resident-led participation in Vision 2050, transparency now is essential to maintain credibility.

- Given the recent **closure of the City Hall front entrance to the public** during key civic meetings, it is especially important that future sessions are perceived as *open, welcoming, and inclusive*.

I respectfully request:

- An **accessible public briefing** on the scope of Amendment No. 14;
- Publication of all **background studies and draft text** at least **two weeks prior** to the meeting; and
- Confirmation that **written submissions** will be appended verbatim to the public record rather than summarized.

Please acknowledge receipt and confirm that this correspondence will form part of the public record for Official Plan Amendment No. 14.

Thank you for your attention and for ensuring that resident voices continue to inform Owen Sound's planning future.

Warm regards,

Pat Kelly

Resident, Owen Sound

From: Norah Toth [REDACTED]
Sent: Friday, November 14, 2025 10:43 AM
To: Mayor & Council <Council@owensound.ca>; Public Notices <notice@owensound.ca>
Subject: Official Plan Amendment - Comments

Firm commitments are required to increase the stock of affordable housing

Below is my feedback concerning a proposed Official Plan Amendment by the City of Owen Sound.

I understand that the City of Owen Sound's Official Plan is the City's contract with residents and guides land-use planning, including affordable housing.

I am aware that tenant households spend a substantial amount of their income on shelter costs. They also regularly rely on services such as OSHaRE, the Salvation Army Food Bank, the United Way of Bruce Grey's Utility Assistance Program and other similar or related social services. They must make decisions related to housing and food and are vulnerable to becoming unhoused.

It has been brought to my attention that despite the opportunity to address the housing affordability crisis made available by this revision to the Official Plan, the City is opting to 'take a pass.'

I agree with the comments made by David McLeish in the Owen Sound Current, November 13, 2025. David McLeish highlights that the review of the Official Plan and its amendment provide an opportunity for the City to use wording that creates an obligation. As he has stated:

"Of the 8 places in the Plan where the City could have addressed affordable housing, it fails to do so. In 4 cases, the word "will" is used, and in the other 4, "may" is used. In contrast to discretionary words like "may" and "will," the word "shall" creates an obligation.

"These terms should be clearly defined in the Official Plan so that citizens can better understand if/when the City is actually committing to doing something."

David McLeish also mentions the fact that the City has another option available to help rectify the housing affordability crisis, a process called the Community Planning Permit System (CPPS), by which municipalities can implement planning policies to increase the stock of affordable housing. David McLeish has identified recommended wording changes in his correspondence with the City.

I believe that the proposed Official Plan Amendment provides the City tools that enable them to commit to several available options that could address the affordable housing crisis.

Sincerely,

Norah Toth

[REDACTED]

Owen Sound, ON [REDACTED]

From: hsmlrcc <hsmlrcc@bmts.com>
Sent: Monday, November 17, 2025 2:22 PM
To: Public Notices <notice@owensound.ca>
Subject: HSM comments re Official Plan Update

Re: City of Owen Sound Official Plan Update

Good afternoon,

The Historic Saugeen Métis (HSM) appreciates the opportunity to review the City of Owen Sound's Official Plan Update. HSM offers the following comments for consideration:

- HSM recommends the addition of "and Indigenous communities" in section 6.1.5.1 as follows:

6.1.5.1 Where there is an application for development purposes to redesignate Hazard Lands or a significant development is proposed adjacent to Hazard Lands, Open Space or any significant natural heritage feature, the City shall require the preparation of an Environmental Impact Study in accordance with the provisions of this section and in consultation with the County of Grey and/or Grey Sauble Conservation Authority and Indigenous communities.

- Or, the *addition* of the following clause in section 6.1.5

The City shall consult with Indigenous Communities and consider their rights and interests when an Environmental Impact Study is required.

- HSM supports the inclusion of section 6.1.6 with regards to offsetting, and in particular sections 6.1.6.2 and 6.1.6.3.

Regards,

Neala MacLeod Farley
Coordinator, Lands, Waters & Consultation



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Southampton, ON
www.saugeenmetis.com
519-483-4000

From: Sasha Fernando <associate.ri@saugeenojibwaynation.ca>
Sent: Monday, November 17, 2025 10:22 AM
To: Staci Landry; Tim Simmonds; Sabine Robart; Pam Coulter
Cc: Planning Act Prescribed Persons/Bodies
<planningnotices@owensound.ca>; Development Team
<developmentteam@owensound.ca>; Saugeen Ojibway Nation (Manager)
<manager.ri@saugeenojibwaynation.ca>; Janet Galant
<manager@saugeenojibwaynation.ca>; Natalie Kuipers
<gis@saugeenojibwaynation.ca>; Richelle Ritchie
<execassist.ri@saugeenojibwaynation.ca>
Subject: Re: Notice of Special Meeting - Official Plan Amendment No. 14

Hi Stacy,

On behalf of the Saugeen Ojibway Nation Environmental Office (SON EO), we are writing in response to the public notice for the City of Owen Sound Official Plan Amendment No. 14 and the upcoming Special Council Meeting on November 24, 2025.

SON has an ongoing interest in land-use planning, environmental management, and infrastructure decisions within their Territory, including the City of Owen Sound. As reflected in the Provincial Planning Statement, planning authorities are expected to undertake early engagement with Indigenous communities to support knowledge-sharing, consideration of Indigenous interests in land use decision-making, and the identification of potential impacts on the exercise of Aboriginal or treaty rights. In this context, we will not be attending the meeting but wish to remain informed and provide written input where the amendment may affect SON rights, interests, or stewardship responsibilities.

We request the following:

- A digital copy (or link) to the full draft Official Plan Amendment, including any updated mapping and policy schedules.
- Identification of any proposed changes related to natural heritage, water resources, consultation with Indigenous communities, or cultural heritage/archaeological resources.

- Confirmation that SON will be notified of future planning processes or updates arising from the Official Plan Review.

We appreciate the opportunity to review and comment. Please add the SON EO to your circulation list for all further notices related to this file.

Thank you,

Sasha Fernando

Resources and Infrastructure Coordinator

associate.ri@saugeenojibwaynation.ca

C: (705) 798-3312

Resources & Infrastructure Department

10129 Hwy 6 Georgian Bluffs, ON

N0H 2T0

saugeenojibwaynation.ca

I am grateful to live, work, and benefit from the Lands and Waters of the Saugeen Ojibway Nation.

Social Finance & Housing Group
Hosted by the Institute of Southern Georgian Bay

November 18, 2025

**RE: Community Feedback on proposed amendment 14: Owen Sound's Official Plan:
Concerning Affordable Housing**

To: Pam Coulter, City Manager,
Briana Bloomfield, City Clerk
From M. Struthers, SF & H Group

Dear Pam,

I am writing on behalf of the Social Finance and Housing Group. As you know from our prior deputation, we have been working with our region's counties and municipalities for the last four years in search of local solutions to the Affordable Housing Crisis. Our local Owen Sound Group met recently and reviewed the Affordable Housing Amendment to the draft Official Plan. We want to congratulate Owen Sound on inclusion of a section on Affordable Housing. It is an important step to give the municipality the tools to address the crisis.

Our group's strategy is to encourage municipalities to collaborate regionally on best planning and development practices to create a priority on affordable development. As such we encourage municipalities to be aware of, and take advantage of, the solutions developed in other communities. We would like to draw your attention to our [Affordable Housing Tool Kit](#) and specifically to the [Whole Community Approach to Affordable Housing](#) and the document [The Affordable Housing Crisis: How can you municipality help?](#) for an outline of a community-driven approach and some of the tools often underused by municipalities. We also recognize that, Collingwood has addressed affordable housing extensively in its [Official Plan](#). *Section 3.2 Providing Housing Options* has supported Collingwood, as a municipality close in size to Owen Sound to create a robust civic engagement and investment approach to the problem of affordable housing.

We are pleased that the proposed amendment **includes the provincial definition of 30% of gross income**. The strength of local development practice is the ability to recognize the income and economic demographics specific to each community. We understand this as particularly important for Owen Sound which houses many of our region's low-waged service workers, many of whom are renters. This definition opens the opportunity for data-based targets to guide planning for development and support for local business.

We also welcome the **addition of "employee housing" in designated Employment 2 Lands**, recognizing that in the absence of a well-coordinated regional transportation

system, many lower income employees have no option but to live close to their source of employment.

We look forward to more conversation on the **land banking proposal**. This is particularly in line with our regional *Whole Community Approach to Affordable Housing* plan. In this plan a regional land trust is proposed to act as a “trusted broker” for surplus and county municipal lands to ensure the best affordable development options are made possible. We would be pleased to engage in further conversation on this option.

Following are our recommendations for your consideration regarding the details of the Draft OP:

1. **Distinguish between *Moderately Affordable Market* and *Deeply Affordable (or subsidized) housing within the provincial 30% of income benchmark for housing costs*.** While including the provincial definition of affordability for housing costs is a step forward, the challenge for planning is that it bundles both affordable market and subsidized housing into a single data point. For planning purposes it would be helpful to additionally adopt the sub-definitions referenced in the recent United Way Ontario report [Build for Good: Delivering the Housing Ontario Needs](#) (pg.19) co-authored by Michael Jacek of AMO. The report proposes distinguishing between housing that is “*deeply affordable*” due to subsidy and “*moderately affordable*” market housing. The latter would be appropriate to the income levels of much of Owen Sound’s workforce, clearly distinguishing between City’s and other levels of governments’ funding responsibilities. Segmenting “affordable” housing for planning enables better data tracking to set targets for the City’s workforce.
2. **Include in the plan a specific reference to a development priority for “*nonmarket housing*”.** Broadly defined, nonmarket housing is developed and held as affordable by charitable or nonprofit organizations such as Lutheran Social Services or the Owen Sound Housing Corporation. These organizations hold not only subsidized units but also the lower income affordable units that fill the market gaps for both seniors and workers in our lower-waged service industries. Because these units are affordable by mission rather than for profit, many Ontario communities are currently deliberately expanding this housing sector as a permanent solution to affordability.
3. **Add recognition and additional protections from conversion for nonmarket rentals for nonmarket providers.** While Section 3.1.6.1 sets out very positive limiting conditions for rental conversions, it is silent on nonmarket housing. Owen Sound has more of this type of affordable housing than any other municipality in our region. While the retention of nonprofit and charity-owned housing is to some degree protected by the convention on transfer of

community-owned assets to other nonmarket agents, this could be further strengthened by recognition and protection by class in the OP.

4. We ask that you also consider including the following:
 - **Update the Community Improvement Plan (CIP) to include provisions that support affordable housing development** that incentivizes affordable housing options such as ADUs, home sharing and other community strategies.
 - **Enact a Municipal Housing Capital Facilities By-law** under the Municipal Act to enable the town to enter into agreements with private and nonprofit partners for the provision of affordable housing.
 - **Promote higher density and taller housing forms, densification and parking concessions** to reduce per unit costs to meet City affordability targets.
 - **Provide relief from development charges for nonmarket housing developers** and others that commit to long-term affordability.
 - **Consider establishing a Citizen Housing Task Force** to create community engagement in solutions and support the City in the development of adequate affordable housing to meet the needs of residents and encourage economic prosperity.

It has been suggested that I request that you forward this note to planner Sabine Robart, as well as the consultants Dave Aston and Aleah Clark. We would appreciate this and would be happy to follow up on these points in conversation.

Thank you for your consideration,

Marilyn Struthers
For the Social Finance & Housing group
mstruthers@torontomu.ca

From: DAVID MCLEISH [REDACTED]
Sent: Wednesday, November 19, 2025 1:46 PM
To: Public Notices <notice@owensound.ca>
Cc: Mayor & Council <Council@owensound.ca>
Subject: O.P.A. Amendment Comments - Revised

I've lost count of the number of times the unhoused have come up in conversations and social media posts lately.

We know that 38.5% (1,602) of tenant households in the City spend 30% or more of their income on shelter costs. People living under these circumstances are precariously housed and vulnerable to becoming unhoused. This figure is consistent with what others are seeing. For example, since 2017, the number of meals served by OSHaRE has increased by 14 times and is expected to provide support to close to 1,000 people every month by the end of this year. The Salvation Army Food Bank assists 1,000 clients monthly and as noted in a recent Owen Sound Current articles, the United Way of Bruce Grey's Utility Assistance Program helped 751 people in Bruce and Grey stay connected to heat and electricity between July 2024 and June 2025 and last winter Safe 'N Sound welcomed an average of 30 people overnight and between 70 and 80 people each day at its drop-in centre. Without these supports and those provided by the County and Brightshores, there is no doubt that the number of unhoused in our community would increase.

Of the 8 places in the Official Plan Amendment where the City could have made commitments to address affordable housing, it uses the discretionary words "will" and "may." I request that the word "shall," which creates an obligation, be used instead as follows:

Section:

- 3.1.5.1 The City ~~will~~**shall** work toward achieving strive to achieve the County goal of 30 percent of all new housing units meeting the threshold of affordable housing.
- 3.1.5.2 The City ~~will~~**shall** support a range and mix of affordable housing options and densities to meet the projected needs of current and future residents of the City by establishing and implementing

minimum targets for the provision of housing that is affordable to low and moderate income households.

- 3.1.5.3 The City ~~will~~**shall** support affordable housing in proximity to transit and amenities to increase mobility and accessibility to goods and services, healthy food retailers, commercial areas, employment, medical and health facilities, recreation, transit, and trails.
- 3.1.5.4 The City ~~may~~**shall** utilize incentive programs, Community Improvement Plans, Zoning By-laws, a Community Planning Permit System (CPPS), and an Inclusionary Zoning Policy to support the construction and maintenance of affordable housing units.
- 3.1.5.5 The City ~~will~~ **shall** support the integration of affordable housing units within the existing community fabric in all designations and Planning Areas, where residential uses are permitted and through development and redevelopment of underutilized commercial and institutional sites.
- 3.1.5.8 The City **shall** support and incorporate the use of land-banking of public lands and/or housing first disposal of surplus lands policies, whereby lands deemed surplus to County or City needs could be added to a public land bank (i.e. an inventory of available lands) and then ~~may~~ **shall** be offered for affordable housing development first, prior to the consideration of other uses. A County or City land bank or inventory ~~may~~**shall** be established for affordable housing needs, to offer low or no-cost lands for such development.

Further, these terms should be clearly defined in the Official Plan in order that citizens can better understand if/when the City is actually making a commitment.

In addition, the City has another option available to help rectify the housing affordability crisis. In 2016 the Liberal Government amended the Planning Act to include a tool called Inclusionary Zoning (IZ). This gave municipalities the authority to require a percentage of affordable housing units in new residential developments. There was no cost to the taxpayer and developers could not appeal this requirement.

The Province has since restricted the use of IZ to an “area that is a protected major transit station area,” and in 2025 imposed upper limits (5% of units)

on the percentage municipalities can require. Despite these constraints there is still a process, called the Community Planning Permit System (CPPS), by which municipalities can implement planning policies directed at increasing the stock of affordable housing. I therefore request the following change be made to the O.P.A.

Section:

- 3.1.5.6 The City ~~may~~ **shall** complete an **any required background study and/or** assessment report, ~~work to develop inclusionary zoning policies~~ **establish a Community Planning Permit System (CPPS), and implement an Inclusionary Zoning Policy as soon as possible.**

Sincerely,

David McLeish
Owen Sound

November 21, 2025

Ms. Briana Bloomfield
City of Owen Sound
808 2nd Ave. E
Owen Sound, Ontario N4K 2H4
Sent via E-mail

RE: Comments on Owen Sound Official Plan Amendment # 14 & Related Zoning By-law Amendment

Dear Ms. Bloomfield,

Thank you for providing OPA #14 and the related Zoning By-law Amendment documents for County review. What follows are select comments related to the provisions of the *Planning Act*, the Provincial Policy Statement (PPS) 2024, and the County Official Plan. Additional general comments have also been included with respect to overall clarity and understanding, where appropriate.

The County’s comments include those from not just the Planning department but also reflect input from Economic Development staff. Most of the comments below are very minor in nature, but there are some that may warrant further discussion. County staff would welcome the opportunity to discuss any comments further, once City staff have had the time to review this submission.

ID	Section or Schedule	Comments
1	3.1.5.6 (via OPA #8)	<p>This proposed provision is included alongside other policy statements offering support for a fulsome range and mix of affordable housing options within the City. This provision (3.1.5.6) specifically identifies that “The City may complete an assessment report and work to develop inclusionary zoning policies”.</p> <p>County staff generally support the uptake of planning tools identified within the Planning Act, to meet local objectives. This policy change proposes inclusion of wording as could support completion of an assessment report for inclusionary zoning (IZ), at the City’s discretion.</p>

		<p>Staff understand that presently, the application of IZ would be limited to locations subject of a Development Permit System (or rather, a Community Planning Permit System) per the Act. While the Official Plan includes brief existing verbiage around the potential consideration/use of a Development Permit System approach, more fulsome policies would be expected to be necessary to support implementation of such a system, and related Inclusionary Zoning, if desired in future. Such further work would identify goals, objectives and policies for such area, and would identify classes of development and conditions as may be imposed on permits.</p> <p>Should the City pursue such additional work in future, County Staff would be glad to discuss further. General supportive policies are included within the County Official Plan.</p>
2	3.9.1.2 (via OPA items #12 & 15)	<p>This proposed policy section describes permitted uses as would apply to the new Employment 2 designation of the City’s Official Plan. This designation would allow for a broader range of uses than are provided for within the core proposed Employment 1 designation.</p> <p>Staff appreciate the work that has gone into evaluation of the City’s Employment Area designation and the proposed redesignation of such lands into Employment 1 and Employment 2 sub-areas, as arises from redefinition of “Employment Area” within the Planning Act, and Provincial Planning Statement (2024).</p> <p>The Act is now quite explicit in offering a definition of Area of Employment, as follows: <i>“area of employment” means an area of land designated in an official plan for clusters of business and economic uses, those being uses that meet the following criteria:</i></p> <ol style="list-style-type: none"> <i>1. The uses consist of business and economic uses, other than uses referred to in paragraph 2, including any of the following:</i> <ol style="list-style-type: none"> <i>i. Manufacturing uses.</i> <i>ii. Uses related to research and development in connection with manufacturing anything.</i> <i>iii. Warehousing uses, including uses related to the movement of goods.</i> <i>iv. Retail uses and office uses that are associated with uses mentioned in subparagraphs i to iii.</i> <i>v. Facilities that are ancillary to the uses mentioned in subparagraphs i to iv.</i> <i>vi. Any other prescribed business and economic uses.</i>

	<p><i>2. The uses are not any of the following uses:</i></p> <ul style="list-style-type: none"><i>i. Institutional uses.</i><i>ii. Commercial uses, including retail and office uses not referred to in subparagraph 1 iv; (“zone d’emploi”)</i> <p>Within the proposed Employment 1 designation, the proposed permitted uses identified largely mirror the permissions and exclusions offered via the definition of “Employment Area” within the Act. This ensures that the policy tests of Section 2.8.2 (5) of the PPS(2024) apply to any application for removal of lands from the Employment Area designation, as is described in proposed policy 3.9.3.3 to the City’s plan, which would require a study be completed, in support of such a request.</p> <p>Further, Section 2.8.1 (3) of the PPS would apply to lands within 300m of “Employment Areas” where development is required to avoid or minimize and mitigate potential impacts on the long-term economic viability of employment uses within the “Employment Area”. This evaluation requirement is proposed to be embedded into the City’s plan via new policy 3.9.3.1, as would apply to lands within 300m of the Employment 1 designation.</p> <p>With the proposed permitted uses for the Employment 2 designation being broader than defined by the Act for an “Employment Area”, County Staff identify that the policy tests of Section 2.8.2 (5) of the PPS(2024) regarding designation change requests, would not necessarily apply in the same protective manner to Employment 2 lands, as would apply to “Employment Areas” meeting Act definitions/use prohibitions.</p> <p>While proposed policy 3.9.4.3 is also being advanced in the City’s plan, with an intent to maintain “Employment Area” status for lands in the Employment 2 designation where a legal non-conforming use exists that would result in the exact definition of “Employment Area” not being met, County staff expect that with future establishment of new uses on these lands which don’t comply with the Act definition of “Employment Area” (i.e. per the broader Employment 2 permitted uses) the status of such lands as a formal “Employment Area” in the meaning of the Act would be gradually lost, parcel by parcel. Staff thus understand the functional intent of this policy as being a ‘best effort’ to maintain such policy protections for Employment 2 lands in this regard.</p> <p>County Staff identify that ongoing protection of the broader area (including both Employment 1 & 2 lands) from sensitive/ incompatible uses is generally recommended for the go-forward.</p>
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		<p>This will be especially important for large-scale greenfield parcels within the industrial park area, as may facilitate future core manufacturing and related uses to establish on these lands, and as would align with ongoing efforts relating to investment attraction per the County’s Economic Development Master Plan.</p> <p>Staff would highlight that the inclusion of Employee Housing as an express permitted use on all lands in the Employment 2 designation could represent a significant challenge to the marketing and/or development of abutting/nearby Employment 1 lands for their intended purpose.</p> <p>Staff recommend removal of Employee Housing from the list of permitted uses for Employment 2 lands, suggesting instead any such application be dealt with via a site-specific Official Plan Amendment, ensuring a fulsome justification and consideration of compatibility and any potential impacts to the intended function of abutting Employment 1 and 2 lands to accommodate core industrial/employment uses. Further, given the policy requirement to evaluate compatibility within 300m of Employment 1 lands at the time of a change request, Staff suggest this would be a more transparent approach in communicating permissions for these lands. Such compatibility evaluation could be reasonably expected to functionally/practically preclude, direct or scope the addition of residential uses on these lands, and so stating a broad permission in this regard could be somewhat misleading.</p>
3	3.9.3.3 (via OPA #15)	<p>Staff note that this proposed section appears to implement Section 2.8.2(5) of PPS(2024), as reflects amendments by the province to remove mandatory ‘Comprehensive Review’ requirements applicable such change requests to remove lands from “Employment Areas”. Accordingly, the proposed change to the City’s OP does not use wording around ‘Comprehensive Review’, instead noting that removal of lands from the Employment 1 designation may only occur where a study has been completed to demonstrate satisfaction of specified criteria.</p> <p>From a conformity standpoint, the Grey County Official Plan (GCOP) has not yet been amended in this regard and still articulates a Comprehensive Review requirement where lands would be proposed for removal from “Employment Area” designation. Staff suggest that despite that verbiage, the specific policy tests required to be addressed via such review per the GCOP are also generally addressed/articulated within proposed 3.9.3.3 per the City’s amendment.</p>

		<p>Staff do not have concerns regarding conformity in this regard, as the local plan does not explicitly preclude the ‘Comprehensive Review’ still articulated in the County plan but does otherwise require evaluation of such common policy tests as the County policy indicates, as also would be consistent with PPS(2024) requirements for evaluating such change requests. Should a designation change request be received in the interim, before further updates to the County Official Plan in this regard, further discussion may be required around how such interim inconsistency may be resolved practically, within such process.</p> <p>Staff finally note that the reference included at 3.9.3.3 b) a) states “<i>avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts to existing or planned employment area uses in accordance with policy 3.5</i>”</p> <p>It is suggested that a minor change be made to clarify that the reference to ‘policy 3.5’ is made in reference to policy 3.5 of the PPS(2024) and not an internal reference within the City’s OP.</p>
4	3.9.4.2 (via OPA item #15)	<p>This proposed amendment to the City’s plan identifies policy tests in relation to establishing Employee Housing, upon lands designated Employment 2.</p> <p>As noted above, the inclusion of Employee Housing as an express permitted use on all lands in the Employment 2 designation could represent a significant challenge to the marketing and/or fulsome development of abutting Employment 1 (and Employment 2) lands for their intended purpose. County Staff recommend removal of Employee Housing as a specified permitted use in the Employment 2 designation, instead preferring a site-specific amendment process in justification/evaluation of any individual request to establish such housing.</p> <p>In speaking with City Staff and consultants on this element, County Staff understand that it was perhaps interpreted that Grey County Official Plan (GCOP) policies at Section 4.2.10 regarding Employee Housing would ‘direct’ such permissions to be included within the local plan. County Staff advise that the policies of the GCOP regarding Employee Housing are intended to be permissive but not prescriptive/directive, and thus the City’s discretion would apply.</p> <p>That said, as noted above, County Staff would suggest that location of Employee Housing directly upon or immediately abutting Employment Areas can create functional challenges to the fulfillment of the role of these lands for industrial/employment</p>

		<p>purposes. There may be specific situations where such inclusion of Employee Housing on employment lands is appropriate – for example, based on the nature or operational requirements of a particular employment use - however in general terms, Staff understand the direction of the PPS is to discourage such uses, with policy directly <i>prohibiting</i> such use in “Employment Areas” proper. Instead, such housing would be directed to appropriately designated lands nearby or elsewhere within the broader settlement area.</p> <p>Section 2.8.2 (3) of the PPS species that “<i>planning authorities shall designate, protect, and plan for all employment areas in settlement areas by: ...b)prohibiting residential uses, commercial uses, public service facilities and other institutional uses...d) prohibiting other sensitive land uses...e)including an appropriate transition to adjacent non-employment areas to ensure land use compatibility and economic viability.</i>”</p> <p>While the Employment 2 designation includes a broader range of permissions (e.g commercial uses) it would not be expected to act as a transitional area given the inclusion of manufacturing/core “Employment Area” permitted uses on these lands as well.</p> <p>County Staff offer that perhaps a future planning assessment/ exercise could further consider peripheral Employment 2 lands for scoping of uses to serve as a more formal ‘transition area’ between Employment 1 & 2 lands and nearby sensitive uses. Careful consideration of siting and setbacks of any uses permitted here would be necessary, again focused on maintaining viability/optionality for employment uses, the protection of “Employment Area” lands, and the realization of the specific role of the broader industrial park area to support employment growth over the planning horizon.</p> <p>Staff would additionally note and emphasize that affordable and attainable housing targeted to serve members of the local workforce is both necessary and strongly encouraged within the Primary Settlement Area of Owen Sound – the considerations raised above are focused specifically on the appropriate siting of such uses so as to ensure ongoing protection of the function of the Employment Area, and should not be interpreted in any manner as discouraging such housing creation generally.</p>
5	7.4.3.2 (per OPA Item #26)	<p>This section is amended to include an updated ‘alternative rate’ for parkland dedication. Such rate is established within the Planning Act (Section 51.1 (2)) allowing for a municipality to request 5% of all land proposed for development/redevelopment, or an alternate</p>

		<p>rate of one hectare per 600 residential units, or at such lesser rate that may be determined by the municipality.</p> <p>Section 7.12.1 (2) of the GCOP articulates an alternative rate of one hectare per every 500 dwelling units proposed “in accordance with the Planning Act”. This was the alternate rate previously articulated by the Act - the GCOP has yet been updated in this regard. This rate would indicate a greater dedication of land, than is articulated by the Act as updated and via the proposed City policy revision.</p> <p>Staff suggest that given the intent noted in the GCOP to apply the alternative rate “in accordance with the Planning Act” it would be appropriate to defer to the lesser rate identified within the Act, and as reflected in the local OPA.</p>
6	9.3.4.2 (via OPA Item #31)	<p>County staff note that via recent changes to the Planning Act, Minister’s approval is required prior to adoption of any amendment that that “<i>adds, amends or revokes any of the provisions described in subsection 22 (5), 34 (10.2), 41 (3.4), 51 (18) or 53 (3)</i>” of the Planning Act. For ease of reference, these are provisions relating to determination of what ‘other information’ or materials – beyond what is prescribed by the province – will be required to constitute a “complete application” under the Act.</p> <p>Staff highlight that proposed policy 9.3.4.2 states: <i>The City may require any and all plans and studies outlined in Schedule ‘E’ prior to considering an application complete.</i></p> <p>Staff identify that this provision relates to such ‘other information’ for complete application purposes, however would highlight that such requirement is already articulated within the City’s OP, at Section 9.4.1, applicable to Site Plan applications. As such, it is staff’s opinion that this provision simply restates such requirement for ease of the reader (i.e within the site plan specific section of the plan) but does not add, amend or revoke existing requirements of the official plan in this regard. ‘</p>
7	9.3.4.2 (via OPA item #32)	Staff suggest revision of this section for clarity of meaning.
8	9.3.4.6 (via OPA item #33)	<p>Staff suggest additional wording to be included here to expressly specify the intent to apply Site Plan Control and request drawings as described by the Act, to development of less than 25 units, on a discretionary basis.</p> <p>Section 41(5) of the Planning Act, specifies that drawings may be required for residential buildings containing fewer than 25 dwelling</p>

		<p>units “if the proposed building is to be located in an area specifically designated in the official plan as an area wherein such drawings may be required.’</p> <p>Staff suggest this specific reference required by the Act could be included, as follows: “Site Plan Control and the provision of drawings for residential buildings containing fewer than 25 dwelling units may be required at the City’s discretion within any designation of the City of Owen Sound’s Official Plan.</p> <p>Where site plan control applies to a residential building with fewer than 25 dwelling units, the applicant may be required to provide the following for each building:...</p>
9	9.4.2.2 (via OPA item #36)	<p>Staff note that the wording of this provision, references that the City may “waive the requirement” for a pre-consultation application. As such consultations are no longer to occur on a mandatory basis, per provincial direction, Staff suggest minor rewording of this clause, to reflect that context.</p>

With regards to the concurrent Zoning By-law Amendment, County staff have had a high-level review of the proposed amendments and acknowledge that the majority of the proposed changes are housekeeping in nature, to amend definitions and add clarity throughout the zoning by-law. County staff acknowledge the contributions of several of the proposed changes towards enabling further housing development within the City – including clarification that mobile homes are permitted as a primary dwelling; the proposed consolidation of residential zones to increase density throughout the City; and the addition of new regulations for “Cluster Development” housing types. Other changes complement the County’s Climate Change Action plan work, such as regulations for required Electric Vehicle parking stalls for new developments.

Please do not hesitate to contact me should you have any questions or concerns with respect to the above.

Regards,



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Cc Sabine Robart, City of Owen Sound (by email only)

November 24, 2025

GSCA File: P25414

Sabine Robart, Manager of Planning & Heritage
City of Owen Sound
808 2nd Ave E
Owen Sound, ON
N4K 2H4

Sent via email: planning@owensound.ca

Re: Application for OPA and ZBA update
Address: City of Owen Sound
Roll No: N/A
City of Owen Sound
Applicant: City of Owen Sound.
Agent: Planning Department

Grey Sauble Conservation Authority (GSCA) has reviewed the proposed Official Plan Update and Comprehensive Zoning Bylaw Update in accordance with our mandate and policies for Natural Hazards and relative to our policies for the implementation of Ontario Regulation 41/24. We offer the following comments.

Subject Proposal

To update the Official Plan and Comprehensive Zoning by-law to reflect recent policy changes with regard to employment lands. To update the Official Plan and Zoning mapping with updates from Site Specific amendments.

Official Plan Comments

The recent Provincial Policy changes with regard to Industrial and Employment lands has required the city to amend its planning documents to implement those changes in policy. These changes do not impact the Natural Hazards policies or mapping. As a result, the GSCA has no concerns with the proposed Official Plan Amendment implementing the new industrial policies and designations.

Comprehensive Zoning By-law Comments

The recent Provincial Policy changes with regard to Industrial and Employment lands has required the city to amend its planning documents including the zoning by-law to implement those changes in policy. These changes do not impact the Natural Hazard Zone policies or mapping. As a result, the GSCA has no concerns with the proposed Zoning By-law Amendment implementing the new industrial policies and zones.

Additional Comments

In our review of the mapping we did note four minor inconsistencies between OP and zoning mapping and our own GSCA mapping. It is recommended that the schedules be amended as noted to staff during the review process.

It is important to note that mapping in the end, is still a representation of a hazard and when there is a discrepancy or interpretation issues it is best to consult with the GSCA and ground truth the mapping through a site visit and potential a survey.

The "Mapping the Natural Hazards within the City of Owen Sound- A Summary" was also reviewed to make sure it is still relevant and has been updated to the latest policy changes. This document is used in conjunction with the Official Plan and Zoning By-law to help explain Natural Hazards. The document for the most part, remains accurate and relevant. In Section 3.0 however it refers to the hazard area of the City's shoreline as being delineated by the 100 year flood lake level of 177.9m GSC plus 15m for wave uprush.

In 2015 Canada adopted a new height reference system: The Canadian Geodetic Vertical Datum of 2013 (CGVD2013). It replaced Canadian Geodetic Vertical Datum of 1928 (CGVD28). This is important as CGVD 28 uses the 177.9m while the new datum uses the 177.56m which is lower.

With most transitions it can take time and therefore all surveys provided to the City should now identify which datum they are using to verify which elevation for the 100 year flood line is to be used.

Regards,

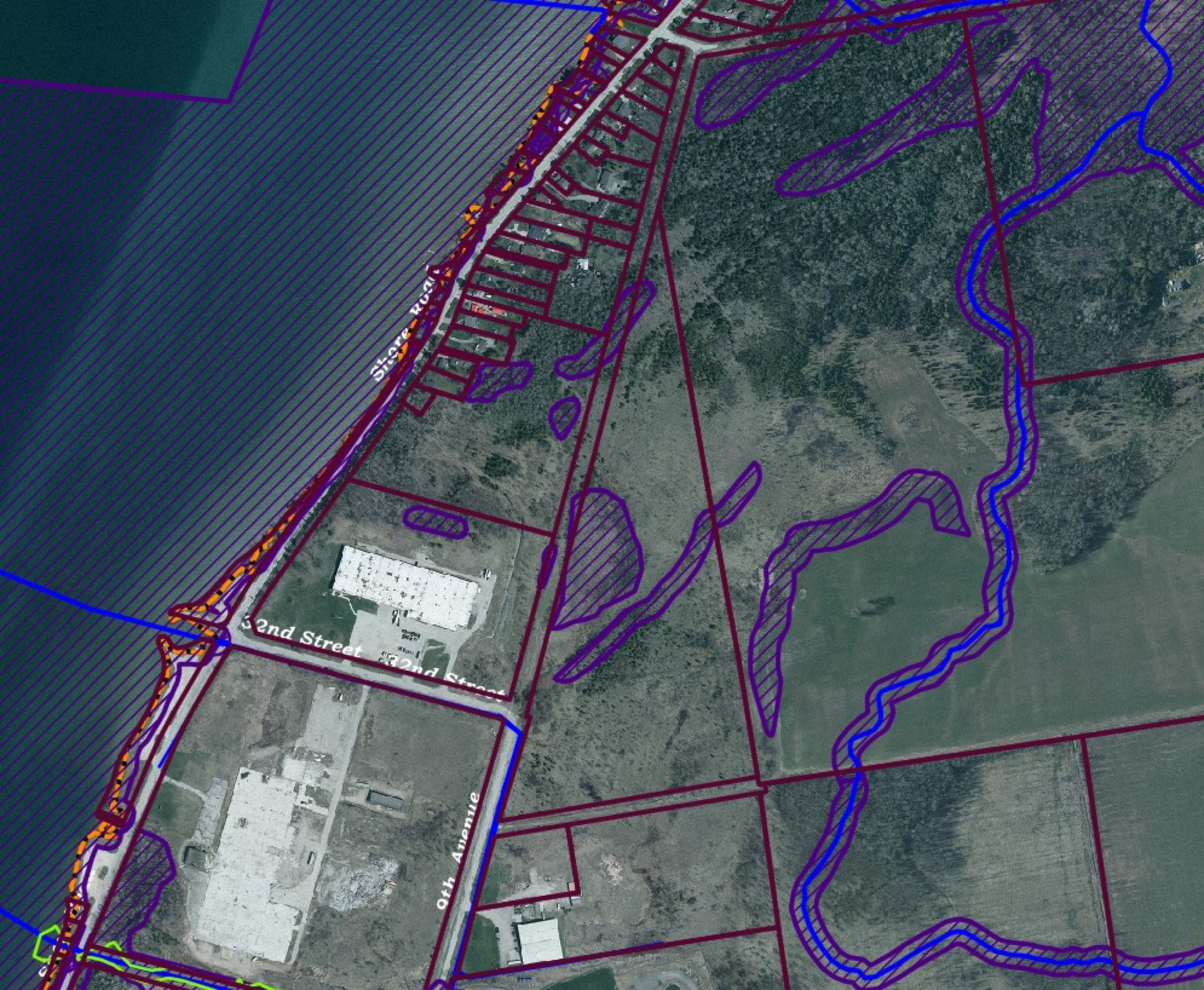


Clinton Stredwick, BES MCIP RPP
Environmental Planner

Cc via email:

Scott Greig
Jon farmer

Encl.



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