

	Section or Schedule	County Comment
1	Intensification & Growth direction; Boundary Expansions	<p>West Grey is unique in that it includes two fully-serviced primary settlement areas. While general intensification policy is included within the West Grey plan applicable to both Durham and Neustadt, detail has not been provided regarding how growth may be expected to be allocated or accommodated within each of these settlements, or preferentially in one vs the other.</p> <p>Staff encourage consideration of land needs to accommodate the forecasted growth within/between these primary settlement areas which may inform more nuanced/distinct intensification policies or approaches for these settlement areas separately, based on the layout and characteristics of each. The role and expected and/or intended growth for other settlement areas within West Grey could also be considered as part of this exercise.</p> <p>With consideration to settlement boundary extension as reflected within the draft Official Plan notice/map, Staff anticipate that supporting information will need to be provided to justify such expansion, addressing the land need and growth direction matters noted above, among other policy items/tests. We would consider here the direction provided within Section 2.3.2 (1) & (2) of the PPS, 2024, and Section 3.4.2 of the Grey County Official Plan.</p>
2	Regarding Complete Application Requirements of the Act (& confirmation with MMAH)	<p>With consideration to the reports/studies to be provided alongside applications, as identified within development policies of the plan, and itemized in the section relating to Technical Studies (Part M), County Staff suggest that reference be included to denote the types of Planning Act applications to which these policies/studies may apply, including also reference to the Sections of the Planning Act which establish these provisions.</p> <p>This relates to the very specific wording of the Planning Act that notes ‘other information’ may be required in support of a complete application but ONLY IF the official plan contains provisions relating to requirements under each specific section of the Act.</p> <p>For example, with respect to ZBLA; Section 34 (10.2) of the Act identifies that: <i>(10.2) Subject to the regulations, a council may require that a person or public body that applies for an amendment to a by-law passed under this section or a predecessor of this section provide any other information or material that the council considers it may need, but only if the official plan contains provisions relating to requirements under this subsection.</i></p> <p>The later provisions of the Act in that section relating to refusal and timing (10.3) and complete application evaluation (10.4) rely on inclusion of the official plan references relating to submission requirements.</p>

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		<p>This applies similarly to other application types, OPAs (22(5)); ZBLA (34 (10.2)); SPC (41(3.4)); Plan of Sub (51918)); Consent (53(3)). Perhaps a catch all statement/reference could be offered within Part M of the plan.</p> <p>Important Note: Given recent act changes, Staff anticipate that discussion with the Ministry will be required to clarify requirements for a new OP and inclusion of study requirements for complete application. This relates to Bill 17 changes, which require Minister’s approval for any amendment to an OP relating to such study/complete application requirements, noting further that such amendment adopted after May 12, 2025 without such approval would be deemed not to have been adopted. County Staff are unclear how this applies in the context of a <i>new</i> official plan.</p>
3	B5	Public Engagement & Notice – should ‘Consents’ be specified here as well? i.e. Plan of Subdivision; Consents
4	C1	<p>Suggest a wee framing sentence in advance of the lettered/itemized clauses, perhaps something like...</p> <p>‘The Official Plan is intended:’</p>
5	C4 (c)	<p>Staff suggest minor changes, as shown in bold in the excerpted clause below.</p> <p>Staff also suggest the word ‘may’ as used below, should be stronger, i.e ‘will’ – the PPS, 2024 (4.6 (5) directs that <i>Planning authorities shall engage early with Indigenous communities and ensure their interests are considered when identifying, protecting and managing archaeological resources, built heritage resources and cultural heritage landscapes.</i></p> <p>Developers are encouraged to consult early in their process with representatives of First Nations and Métis communities, and West Grey will further engage with these Indigenous communities with each development application and consider their interests when identifying, protecting, and managing cultural heritage and archaeological resources.</p>
6	C6 Housing	For clause ‘e’ – I appreciate inclusion of the wording ‘subject to the limits of enabling legislation’ as likely address my comment in principle, however just for clarity for other readers, I do wonder if it makes sense here to perhaps speak to some examples of mechanisms that could enable this...e.g. via Community Improvement Plan, Capital Facilities By-law, or perhaps where negotiated in relation to a transfer of lands, etc.

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7	C6 Housing	For clause 'h' – Staff note that there is detailed policy relating to conversions, within the County OP. Staff suggest a brief reference be made here to advise the reader accordingly. Section 4.2.2. of the Grey County OP applies, outlining criteria for conversion of rental units to condominium.
8	D1.2 Uses Permitted in All Designations	<p>Small Scale renewable energy – Staff note that the definition included in the OP limits to wind, water, solar on a roof and would permit such energy generation of less than 10kW.</p> <p>Staff note that 10kW is the ‘threshold’ above which ground mounted solar would require an Renewable Energy Approval (REA) and is perhaps useful for directing/limiting roof mounted solar to a small scale, however for wind, an REA process would apply to Class 2 facilities or more, a Class 2 having a nameplate rating of more than 3kW but less than 50kW. The 10kW threshold used in the OP definition may be appropriate, however provincial approval/process would apply.</p> <p>Staff wonder if perhaps some further reference regarding ‘ancillary’ or ‘accessory’ nature of such permission may make sense (i.e. splitting out the use case based on whether such a use is a standalone energy generation project vs. occurring in a manner that is secondary/supportive to a permitted main use).</p> <p>Public Utilities – Staff note the definition included in the OP specifically excludes ‘energy generation facilities’ which given the contracted nature of energy supply being pursued by IESO (i.e. by private proponents) makes good sense. Staff wonder if also a reference should be included here to note energy storage systems – as IESO has been soliciting for standalone storages via prior contract intakes.</p>
9	D2.5 ARUs	<p>Staff note that the interchangeable use of ‘residential units’ and ‘additional residential units’ in this section may benefit from some further revision for clarity between the clauses, and in consideration to the definition provided.</p> <p>In clause (a) it’s clear that the two units in the main building are allowed, with 1 ‘additional’ unit in a detached structure.</p> <p>In clause (b) it’s clear that three units in the main building are permitted, provided no ‘additional’ units in detached structures.</p> <p>In clause (c) it’s not so clear. I think here we mean to say that one (1) <i>additional residential unit</i> is permitted in an ancillary/detached structure, where the main building includes no more than 2 residential units, and no other additional residential unit is provided within a detached/ancillary structure otherwise.</p>

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	<p>Perhaps, the section could be entitled Additional Residential Units, but references to ‘additional residential units’ within the text of the section/clauses could be otherwise withheld, following suit instead with the way the wording is offered in the Planning Act. The associated definition could perhaps be removed.</p> <p>In essence, a revised Section D2.5 could read:</p> <p>Additional Residential Units shall be fully serviced by Municipal water and sewer services, and permitted as follows:</p> <p>(a) a second residential unit in a detached house, semi-detached house or rowhouse on a parcel of land on which residential use, other than ancillary residential use, is permitted, if all buildings and structures ancillary to the detached house, semi-detached house or rowhouse cumulatively contain no more than one residential unit;</p> <p>(b) a third residential unit in a detached house, semi-detached house or rowhouse on a parcel of land on which residential use, other than ancillary residential use, is permitted, if no building or structure ancillary to the detached house, semi-detached house or rowhouse contains any residential units; or</p> <p>(c) one residential unit in a building or structure ancillary to a detached house, semi-detached house or rowhouse on a parcel of land, if the detached house, semi-detached house or rowhouse contains no more than two residential units and no other building or structure ancillary to the detached house, semi-detached house or rowhouse contains any residential units.</p> <p>Likewise, the following clauses relating to the implementing comprehensive zoning by-law could be amended further to reflect the above language changes, perhaps as follows:</p> <p>a) A minimum of 1 additional parking space per unit be provided for any second and third residential unit on a lot, applying in addition to the parking space requirements of the zoning by-law for the permitted primary residential unit.</p> <p>b) A residential unit in a building or structure ancillary to the primary house or rowhouse building, shall be smaller in total floor area than the primary house or rowhouse building.</p>

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10	D2.7 General Development Policies; Clauses e and f	<p>Re: Clause e) - Staff recommend that the word 'minimum' be included before the word 'density' with reference to the 25 units per net hectare density requirement. This is a minimum density requirement per the County of Grey OP, applicable within primary settlement areas.</p> <p>Staff note that clause e is targeted for 'greenfield' development, with clause f speaking to developers/owners/builders of multi-unit/multi-lot <i>infill developments</i> and encouraging them to 'strive for minimum development density of 25 units per net hectare. This appears to conform to 3.5(9) of the GCOP.</p> <p>Staff would flag that for new or infill development by way of plan of subdivision, condominium or via multiple consent applications, justification may be required where a density lesser than 25 units/net hectare is proposed. Several criteria/tests have been outlined in the GCOP in this regard (see 3.5 (5)(b)) – i.e. the development includes a range of unit types; it is demonstrated it's not feasible to meet the minimum density requirement based on natural features, lot configuration or infrastructure limitations; or it has been demonstrated that despite the lesser density, the infrastructure servicing the site will continue to be financially sustainable.</p>
11	D2.8 Conversion of Rental Housing	Section 4.2.2. of the Grey County OP applies, outlining criteria for conversion of rental units to condominium. A reference to the GCOP requirements may be appropriate here.
12	D6 Employment Lands	<p>D6.5 (iv) speaks to all activities relating to cannabis production and processing, being conducted in a fully enclosed building.</p> <p>Staff just wanted to flag that additional detail could perhaps be included relating to the circumstance where this building may be proposed as a greenhouse. This may relate to dark-sky lighting considerations, or perhaps compatibility considerations with adjacent uses – certain periods of the growing cycle may require longer lighting periods than what would be provided naturally/seasonally, requiring artificial lighting in evening, overnight or early morning hours. Many municipalities require curtains/screening during natural dark times, to prevent light pollution/offsite impacts in this regard.</p>
13	D9.6 (g)	<p>This clause states that West Grey may require the proponent to submit an Environmental Impact Study for any development within, or adjacent to, the Environmental Protection designation.</p> <p>The stated objective of this designation is identified as pertaining to protection/preservation of lands having in (D9.1) having inherent physical and environmental constraints to development to avoid potential danger to life or</p>

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		<p>property, though it's noted at D9.6 that the designation may also be applied to lands where natural heritage features exist and require protection from incompatible uses (as further discussed in Section E1 of the Plan).</p> <p>Staff would suggest that an Environmental Impact Study (EIS) may be warranted regarding natural heritage features, however, is not likely to be the study type warranted regarding environmental site hazards. Staff suggest that clause 'g' should speak more generally relating to requests for technical study/assessment, as may apply regarding either hazards or natural heritage features in or adjacent to the EP designation.</p> <p>For example, perhaps this could read: g) West Grey may require the proponent to submit technical study(ies) or assessment(s) for any development within, or adjacent to, the Environmental Protection designation, as may relate to site hazards or natural heritage features.</p>
14	D10.4 (c)	<p>This clause identifies that the creation of new lots within the future development designation shall not be permitted.</p> <p>Staff suggest that where land amalgamation may be appropriate to ready parcels for future development, some caveat may be appropriate here to specify. This would offer clarity in future interpretation.</p>
15	E1.2.2	<p>This section identifies that applications for development in significant habitat or adjacent lands for a Threatened or Endangered Species may be required 'at the discretion of West Grey' and Environmental Impact Study.</p> <p>Staff suggest that perhaps the wording 'at the discretion of West Grey' be removed here, or that Grey County be included as having some discretion here also. Similar requirement would apply under the GCOP, and thus depending on the type of application, such request may be advanced by the County, together with (or separate from) such requirement by West Grey.</p>
16	E1.7 Significant Valleylands	<p>This section notes that 'mapping is not available for significant valleylands'. This is incorrect. Staff suggest removal of this wording, replacing that with reference to the detail offered in the GCOP. Such valleylands were identified within the County's natural heritage system study and have been mapped as 200m wide corridors. Detailed delineation of such valleylands would occur via a site-specific EIS, subject to certain criteria detailed in Section 7.7 of the GCOP.</p> <p>This section further speaks to the fact that an application proposing a development within an area that has potential to be included within or on adjacent lands to Significant Valleylands, may be required to submit, at the</p>

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		discretion of West Grey, an EIS. Staff suggest that this clause should be amended to reflect Valleylands mapping exists (i.e speaking to 'where an application is proposed within Significant Valleylands, or on adjacent lands' an EIS may be required). Further revisions should reflect that such request could come from West Grey, or via Grey County, and in either case would need to address the policy requirements and criteria outlined in the GCOP.
17	E1.8 Significant Wildlife Habitat	<p>Mapping is not available for all significant wildlife habitat in Grey. Some features are mapped though perhaps not entirely.</p> <p>Staff ask that reference be included here, as indicates that an EIS in relation to such potential features, may be required also by Grey County. Staff expect this would largely apply to lands falling within the Natural Heritage System Core/Linkage areas, however, could perhaps apply outside of these areas. Please see Section 7.10 'Other Natural Features' of the GCOP, as speaks to EIS requirements here.</p>
18	E2	This section is entitled 'Hazardous Lands and Hazardous Site' – Staff note that the term defined in the OP appears to be 'Hazard Lands' and suggest that either the definition, or wording used here at E2 be revised for consistency.
19	E2.3.2 a)	Staff note that reference is included here to Regulation 150/06 – Staff note that the Conservation Authority specific regulations have been repealed, this regulation now being a consolidated/comment regulation applicable to all CA's under O.Reg. 41/24
20	E2.5	<p>Again, reference is made here to Ontario Regulation 150/06, this is now a consolidated regulation: O.Reg. 41/24</p> <p>This is referenced here both in the section title, and within the last sentence of the final paragraph.</p>
21	E3 Environmental Impact Study (EIS) policies	<p>Staff suggest a reference to detailed GCOP polices for EIS would make sense here, as we've each captured these requirements using different language and level of detail - GCOP Section 7.11.1; 7.11.2 and 7.11.3 would apply.</p> <p>Grey County would likely have a role in identification of technical issues for an EIS and any scoping, alongside West Grey Staff, and very clearly so in situations where a county and local application are being advanced together (e.g. a Plan of Subdivision with ZBLA).</p> <p>Further, Staff suggest perhaps wording be included here that development may proceed only where the <i>EIS demonstrates that the proposed development or site alteration will have no negative impacts on the values or</i></p>

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		<p><i>ecological functions for which the triggering environmentally sensitive lands or natural heritage features have been identified.</i></p> <p>The EIS author may provide professional advice regarding how such policy test may be achieved, for example thru mitigation, replacement or compensation, which would then need to be implemented (for example, via condition, agreement, security) in order for the PPS policy requirements of no negative impact, to be met.</p>
22	E7 Condominium Developments	Staff suggest that inclusion of the word ‘residential’ between ‘similar’ and ‘policies’ may add further clarity here to those other policies of the plan that may apply.
23	F1 Waste Disposal Sites	Staff ask that you please consider adding Grey County as a specified party in clause ‘g’ or perhaps apply the more general wording here, as is included in the preamble (ie. ‘other appropriate approval authorities’).
24	H1.1 Partial Services or Full Private Services (Interplay with Future Development Lands)	<p>Existing lots provisions of H1.1 would permit private services on a vacant lot 30m or more from the end of municipal water service. This would facilitate up to two dwelling units on such lot.</p> <p>Future Development Lands policies would generally prohibit development but would allow for a detached dwelling on an existing lot of record, <i>provided municipal water and sanitary sewers service the dwelling</i>. This is a more stringent servicing requirement than the servicing requirement applicable within the settlement areas more generally.</p> <p>While it is likely to be interpreted that the more stringent designation-specific policy requiring municipal water and sewer would supercede here, it may make sense to provide some direct acknowledgement of that intent within one of these policy sections, as may be more accessible for a lay reader.</p>
25	H11.1 b	Included only to speak to my assessment here – Section 8.9.1 of GCOP speaks to partial services s/t servicing options report per 8.9.1 (4) of the plan. I expect here, the parameters placed around the lot creation would limit application to infill/rounding on partial services and given that the policies apply only where municipal services are not yet available, a servicing options report is likely redundant here.
26	H2.2 SWM Study	<p>We’d ask that you please add ‘Grey County’ to the list of who may require a Stormwater Management Study/report.</p> <p>For consideration for further reference in this policy section, please note that Section 8.9.2 of the GCOP includes SWM policies and outlines more detailed considerations as to where related studies/investigation may be</p>

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		requested, also offering some policy direction relating to LID and naturalized systems. Further, the County maintains technical guidance in this regard also.
27	K Community Improvement Policies	<p>The OP document itself is scoped as applying only the settlements of Durham and Neustadt, however K1 speaks to a CIP area including/applicable to the entire Municipality of West Grey. It is then noted within the following policies that the intent of a CIP is largely to support settlement area objectives, as are itemized, and so perhaps any comment here around scope is moot anyhow, as the CIP will be settlement area focused.</p> <p>Essentially just flagging this policy, as I'd like to have a brief further think. We can likely include this reference to the entire municipality, but further review may be indicated regarding the actual enabling status of such policy speaking to all of West Grey, where the OP itself is scoped specifically to the settlement areas.</p>
28	N9 Site Plan Control	<p>Staff will flag here that per the Planning Act, specific direction is need in the OP to enable the sustainability elements for SPC consideration. If these are features you'd like to address via SPC consideration, we recommend a notation be made as such within the SPC policies of the plan.</p> <p><i>See Planning Act, 41(4)(e): the sustainable design elements on any adjoining highway under a municipality's jurisdiction, including without limitation trees, shrubs, hedges, plantings or other ground cover, permeable paving materials, street furniture, curb ramps, waste and recycling containers and bicycle parking facilities, if an official plan and a by-law passed under subsection (2) that both contain provisions relating to such matters are in effect in the municipality;</i></p>
29	N12 First Nations and Métis Consultation	<p>Please note that Métis includes an accent, as shown here in this sentence, above the 'e'. We suggest this be replaced in references within the plan.</p> <p>Note: This character is available in the Microsoft Word 'Symbol' drop down menu on the 'Insert' tab of the icon ribbon.</p>
30	Definition: Comprehensive Review	<p>Staff suggest update (or removal) of this definition, as relates to a 'big C' Comprehensive review per past PPS direction.</p> <p>Considerations applicable for a boundary expansion review have been included/itemized at B1.1 a)-f).</p>

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31	Definition: Public Utilities	<p>Staff wanted to offer that a potential addition to the list of 'exclusions' from the definition of Public Utilities could also perhaps be standalone/utility scale Battery Energy Storage Systems. We may see additional intake/RFPs from IESO for these types of systems in the coming years, as are being built/maintained by contractors.</p> <p>Also noted in comments regarding D1.2 (Item 8 in this table).</p>
32	Definition: Small Scale Renewable Energy	Please see comments provided regarding D1.2 (Item 8 in this table).
	<p>Note: These comments are offered prior to review by Ecology Staff– we will request they complete a brief review of functionally-related policies and definitions included in the OP. I will share a copy of this comment table to them for consideration around the items I've already flagged here.</p>	