

August 29, 2023

Hon. Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street - 17th Floor
Toronto, Ontario
M7A 2J3

Dear Minister Clark;

**Re: Brant County Official Plan
ERO Number 019-7246
Ministry Reference Number 29-OP-231816**

Brant County Official Plan Should be Modified to Designate 269 German Road in St. George as Neighbourhood

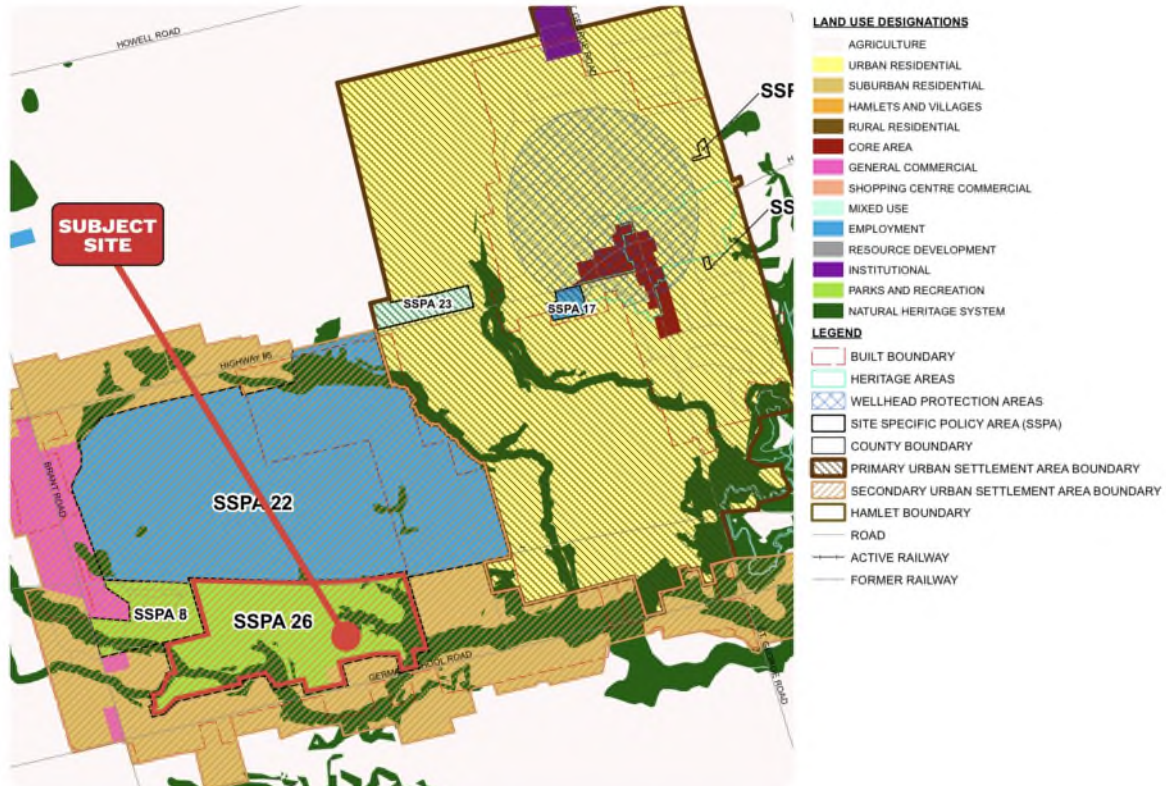
This letter is a submission in response to the Environmental Registry posting for the new Brant County Official Plan. We act for Stemma (St. George) GP Inc. in this matter. A companion planning opinion from Bousfields, a servicing brief from MTE, and a Transportation Report from Salvini Consulting are provided together with this submission. **We are requesting that the Minister modify the land use designation applicable to 269 German School Road (The Oaks of St. George Golf Course) to Neighbourhood.**

Brant County has adopted a new Official Plan, following their Municipal Comprehensive Review, that does not conform with the Growth Plan for the Greater Golden Horseshoe, and does not make sufficient accommodation for growth and residential intensification. It is now before the Minister for his consideration.

The subject site is in the Delineated Built-Up Area in the St. George community in Brant County's Urban System. As such, it represents an opportunity for infill that will constitute intensification under the Growth Plan.

A pre-existing Site-Specific Policy Area designation applying to the site anticipates redevelopment of the lands, and includes a policy that creates priority for servicing capacity to facilitate infill and intensification. Despite this, the proposed Official Plan maintains the designation of the subject golf course site for open space.

The plan below shows the site and the land use designations from the currently in force Brant County Official Plan, including showing the site as its existing use as a golf course, with a Parks and Recreation designation.



A land needs assessment undertaken for the County forecasts that Brant County will achieve 25% intensification (1,498 units) across the Delineated Built-up Area of the urban system of the County (Paris, St. George and Burford). However, the forecast only provides for a 5% intensification rate (84 units between 2022 and 2051) in St. George. Residential development of the subject site, located within the Delineated Built-up Area, provides the potential to achieve a much higher intensification rate than 5%.

In addition to the redesignation of the lands, St. George Site-Specific Policy Area - STG1: the Oaks of St. George, should be modified to read as follows:

4.2 St. George Site-Specific Policy Areas

Site-Specific Policy Area – STG1: The Oaks of St. George

4.2.1 Notwithstanding the contextual statements and policies of this Plan, it is not to be interpreted that Site Specific Policy Area STG1 is of a lower priority for growth and development to the horizon of this Plan.

4.2.2 To permit redevelopment of the lands subject to Site Specific Policy Area STG1, a zoning change shall be required. Any proposed zoning change shall be subject to all applicable policies of this Plan, including STG1(4.2.1). Further, notwithstanding the contextual statements and policies of this Plan, for new residential development, a Planning Justification will be required to support the rezoning.

4.2.3 Redevelopment of Site-Specific Policy Area STG1 for new residential development shall not be subject to the preparation and approval of an Area Study or a Secondary Plan.

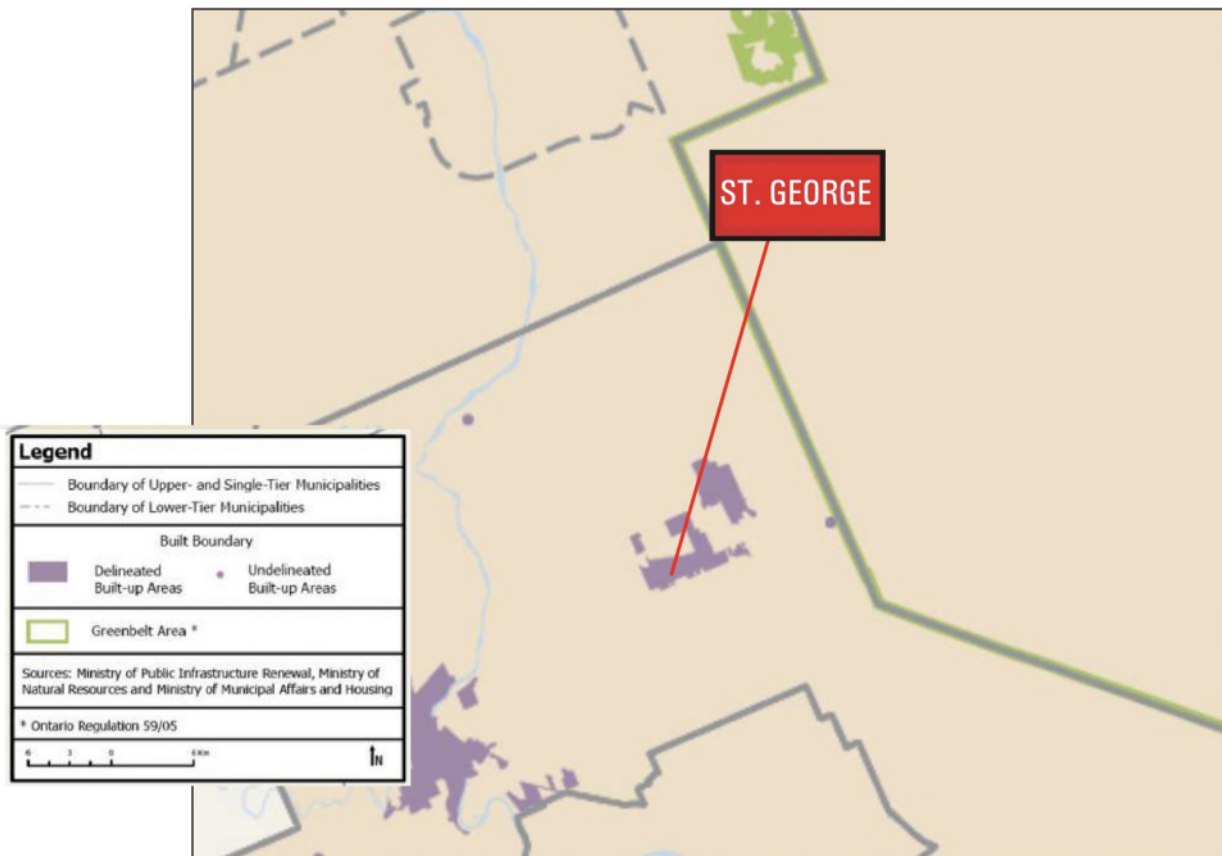
4.2.4 The County shall maintain a limited reserve capacity that provides for infill and intensification to occur, as contemplated, in STG1 with a minimum of 7.5 percent of the total servicing capacity to be reserved and allocated for this and other infill and intensification within the built boundary of St. George as shown on Schedule A – Land Use – St. George to this Plan, in order to assist the County in meeting its minimum intensification target. However, if the reserve capacity has not been utilized within five years of the STG1 lands being rezoned, the County may re-allocate the remaining reserve capacity to development-ready lands at the County’s discretion and in accordance with the approved servicing allocation policy.

The new Official Plan proposes an Urban Residential Collector Road connection into the subject site from the land from the north. We believe that such a connection will result in significant and undesirable traffic infiltration from the employment area to the north, into a residential neighbourhood. As a result, we are requesting that the map in Schedule E-B-2 of the new Official Plan be modified to remove the Urban Residential Collector Road connection into the site from the north.

The Minister should modify the County’s adopted Official Plan to designate 269 German School Road as Neighbourhood, revise Site-Specific Policy STG1 as proposed, and revise the map in Schedule E-B-2 to remove the Urban Residential Collector Road connection into the site from the north. In the alternative, the Minister should refer the matter to the Ontario Land Tribunal for a hearing.

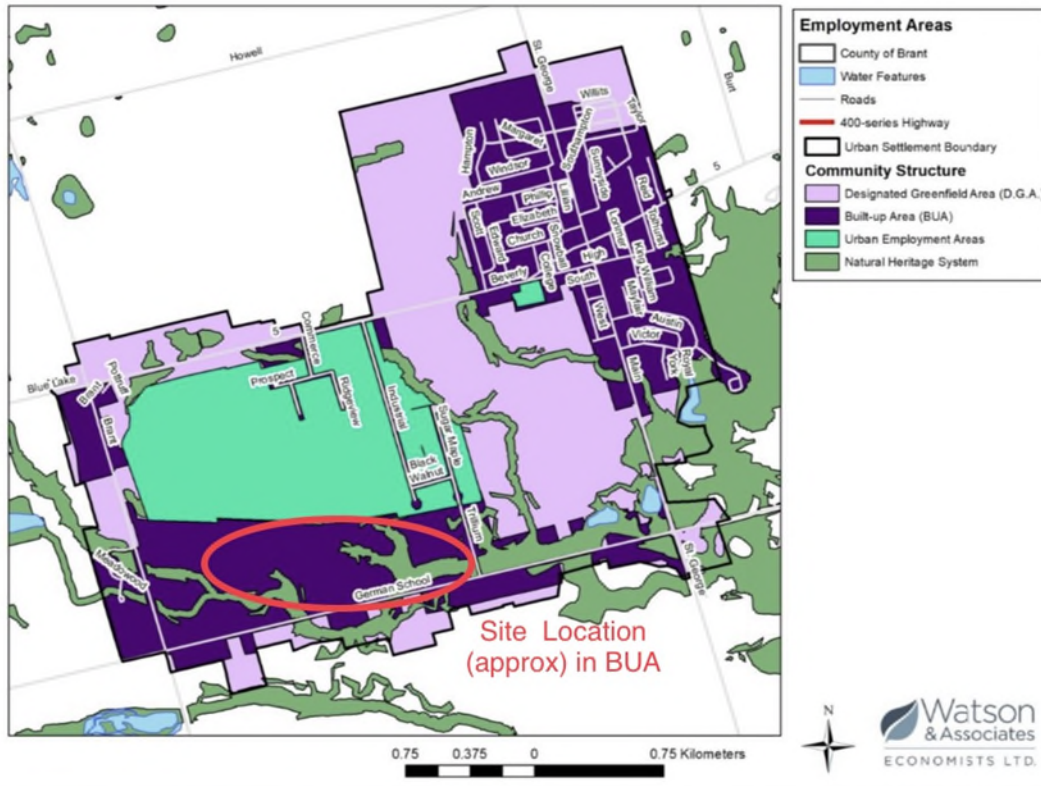
Stremma Owns 56 Hectares of Land, All of Which Has Been in the Delineated Built-Up Area of Brant County Since the Growth Plan Was Initiated in 2006

Stremma (St. George) GP Inc. is the owner of The Oaks of St. George golf course, 56 hectares of land in the community of St. George, in Brant County. All of that site has been mapped as being in the Delineated Built-Up Area since the Growth Plan established that concept when it was initiated in 2006, as shown in the map below.



Built Boundary for the County of Brant, Growth Plan 2017

County of Brant
St. George Settlement Area
D.G.A., B.U.A. and Employment Area



As the plans above demonstrate, the 269 German School Road site is in the Delineated Built-Up Area of Brant County. Provincial policy directs that infill and intensification of sites in the Delineated Built-Up Area for residential development should be a priority.

Growth Plan Policies Direct that Residential Growth Should Be Focused in Delineated Built-Up Areas

Provincial Policy, as reflected in the Growth Plan for the Greater Golden Horseshoe, encourages residential growth and intensification within the Delineated Built-Up Area as a priority.

Policy 2.2.1.2 a) provides as follows:

2.2.1.2 Forecasted growth to the horizon of the plan will be allocated based upon the following:

- a) *the vast majority of growth will be directed to settlement areas that:*
 - i. *have a delineated built-up boundary;*
 - ii. *have existing or planned municipal water and wastewater systems; and*
 - iii. *can support the achievement of complete communities;*

Policy 2.2.1.2 goes on to further direct the focus of growth on delineated built-up areas as follows:

- c) *within settlement areas, growth will be focused in:*
 - i) *delineated built-up areas;*
 - ii) *strategic growth areas;*
 - iii) *locations with existing or planned transit, with a priority on higher order transit where it exists or is planned; and*
 - iv) *areas with existing or planned public service facilities;*

Based upon the above foundational policies from the Growth Plan directing “Where and How to Grow”, it is clear that the site at 269 German School Road represents an ideal opportunity to achieve the provincial policy objectives by allowing for residential intensification and growth within the delineated built-up area.

Despite Provincial Policy Encouraging Residential Intensification of Sites Like 269 German School Road That Are in the Delineated Built-Up Area, Brant County Has Repeatedly Taken Steps to Resist Any Redevelopment of the Site

Notwithstanding the fact that the 269 German School Road site is located in the Delineated Built-Up Area, and as such is an area to which the County is directed to focus growth by the province, Brant County has consistently resisted such intensification of the site.

The County initially attempted to down-designate the site in Official Plan Amendment 8 - ultimately resolved by a settlement that established the Site-Specific Policy Area policy. The County also resisted accepting the owner's development applications for a considerable length of time. The County also adopted an interim control by-law, which had the effect of delaying any consideration of the applications. When the owner filed appeals for the failure of the County to make a decision on applications for the site to the Ontario Land Tribunal, the County brought a motion (ultimately unsuccessful) to have a hearing on the applications declared "premature". Finally, in its adoption of the new County Official Plan, Brant failed to redesignate the site as Neighbourhood, maintaining its current designation reflecting the existing golf course use.

Despite the clear direction of the Growth Plan to direct growth to, and prioritize development on, sites in the Delineated Built-Up Area, Brant County has done exactly the opposite - and made considerable efforts to resist the development of the site.

Clearly, Provincial intervention is required to overcome municipal delay and obstruction, in order that the direction regarding growth and intensification in Delineated Built-Up Areas in Provincial Policy is to be followed. As such, we are requesting that the Minister modify the Brant County Official Plan to permit residential development and intensification on the 269 German School Road site.

Site-Specific Policy Applicable to Site Anticipates Redevelopment, and Allocates Servicing Capacity to Accommodate Such Development

When Brant County sought, through Official Plan Amendment 8, to down-designate the site from "Primary Urban Settlement Areas" to "Secondary Urban Settlement Areas", the owner appealed to the Tribunal.

As part of the settlement of the appeal, Site Specific Policy Area 26 for the subject lands was approved by the Tribunal.

Site Specific Policy Area 26 applied to, and exclusively to, the lands at 269 German School Road. The policy made it clear, through repeated references, that residential redevelopment (intensification) of the site was contemplated. It also provided for a notional allocation of servicing capacity, when available, to the proposed development of 269 German School Road. Below is a copy of the Site Specific Policy as approved and modified into the Brant County Official Plan by the Tribunal.

POLICY MODIFICATIONS

That Section 4.2 is amended by adding a new Section 4.2.26 - Site Specific Policy Area 26 - to immediately follow Section 4.2.25 as follows:

4.2.26 SITE SPECIFIC POLICY AREA 26 269 GERMAN SCHOOL ROAD

a. Notwithstanding the contextual statements and policies of this Plan, it is not to be interpreted that Site Specific Policy Area 26 is of a lower priority for growth and development or will accommodate limited growth on the basis that the lands are within a Secondary Urban Settlement Area. Rather, it is recognized that the application of the Secondary Urban Settlement Area is principally related to the availability of services, which shall not limit the redevelopment potential of Site Specific Policy Area 26.

b. In order to permit redevelopment of the lands subject to Site Specific Policy Area 26, a land use designation change may be required. Any proposed land use designation change shall be subject to all applicable policies of this Plan, including policy 4.2.26 a. Further, notwithstanding the contextual statements and policies of this Plan, it is not to be interpreted that Site Specific Policy Area 26 is required to upgrade to a Primary Urban Settlement Area as part of its redevelopment, including for new residential development, which will require a planning justification report to support the redesignation.

c. The phasing policies in Section 2.8.4 shall not prevent the redevelopment of Special Policy Area 26. However, the redevelopment of Site Specific Policy Area 26 shall be subject to the availability of appropriate servicing systems.

d. Redevelopment of Site Specific Policy Area 26 for new residential development shall not be subject to the preparation and approval of an Area Study or a Secondary Plan. However, if the County initiates an Area Study or Secondary Plan for the Secondary Urban Settlement Area of St. George, the County shall require redevelopment to be coordinated with the process, if appropriate. The County will exercise reasonableness with respect to this policy. It shall not be the intent of the County to frustrate the development application review process where an application has been submitted, but rather to ensure that an application is coordinated with any County initiatives when it is feasible to do so.

Proposed Policy 2.8.3 c. vi is modified to read as follows:

vi. Establishes a limited reserve capacity that provides for infill and intensification to occur, as contemplated in the St. George Area Study, with a minimum of 7.5 percent of the total servicing capacity to be reserved and allocated for infill and intensification within the built boundary of St. George as shown on Schedule A-2 to this plan, in order to assist the County in meeting its minimum intensification target. However, if the reserve capacity has not been utilized by 2028, the County has the ability to re-allocate the remaining reserve capacity to development ready lands at the County's discretion and in accordance with the approved servicing allocation policy.

Schedule Modification

That proposed Schedule A-2 - Land Use Plan St. George is modified by adding Site Specific Policy Area 26 to the subject lands described municipally as 269 German School Road, as shown on the attached schedule "1"

Of note, despite the existence of Site Specific Policy Area 26 and the approved text, including the stirring words that "It shall not be the intent of the County to frustrate the development application review process", Brant County has continued to resist redevelopment of the site - including through an Interim Control By-Law, an Area Study, failure to process the application, and a failed motion to the Tribunal to declare the application premature.

Now, despite the Site Specific Policy, and the development applications by the owners, in the new Brant County Official Plan, instead of designating the lands for redevelopment as contemplated, the Site Specific Policy has been revised and carried forward.

Below is the text of the Site Specific Policy Area STG1 as adopted in the new Official Plan.

4.2 St. George Site-Specific Policy Areas

Site-Specific Policy Area – STG1: The Oaks of St. George

4.2.1 Notwithstanding the contextual statements and policies of this Plan, it is not to be interpreted that Site Specific Policy Area STG1 is of a lower priority for growth and development to the horizon of this Plan. Rather, it is recognized that the application of the change of land use is principally related to the availability of services, which shall not limit the redevelopment potential of Site-Specific Policy Area STG1.

4.2.2 To permit redevelopment of the lands subject to Site Specific Policy Area STG1, a land use designation change may be required. Any proposed land use designation change shall be subject to all applicable policies of this Plan, including STG1(a). Further, notwithstanding the contextual statements and policies of this Plan, SSPA STG1 is required to part of its redevelopment, including for new residential development, which will require a Planning Justification to support the redesignation.

4.2.3 Redevelopment of Site-Specific Policy Area STG1 for new residential development shall not be subject to the preparation and approval of an Area Study or a Secondary Plan. However, if the County initiates an Area Study or Secondary Plan for the Settlement Area of St. George, the County shall require redevelopment to be coordinated with the process, if appropriate. The County shall exercise reasonableness with respect to this policy. It shall not be the intent of the County to frustrate the development application review process where an application has been submitted, but rather to ensure that an application is coordinated with any County initiatives when it is feasible to do so.

4.2.4 Establishes a limited reserve capacity that provides for infill and intensification to occur, as contemplated in the St. George Area Study, with a minimum of 7.5 percent of the total servicing capacity to be reserved and allocated for infill and intensification within the built boundary of St. George as shown on Schedule A – Land Use – St. George to this Plan, in order to assist the County in meeting its minimum intensification target. However, if the reserve capacity has not been utilized by 2028, the County may re-allocate the remaining reserve capacity to development-ready lands at the County’s discretion and in accordance with the approved servicing allocation policy.

A number of changes have been made to the Site Specific Policy, including some apparently missing words in the now policy 4.2.2, and the removal of the former section 4.2.26 c. respecting the phasing policies.

Significantly, the 7.5% priority allocation of servicing for infill or intensification in the Delineated Built-Up Area is even more clearly embedded in the Site Specific Policy applicable only to 269 German School Road, making it clear that the site is the intended recipient of this notional allocation of servicing capacity.

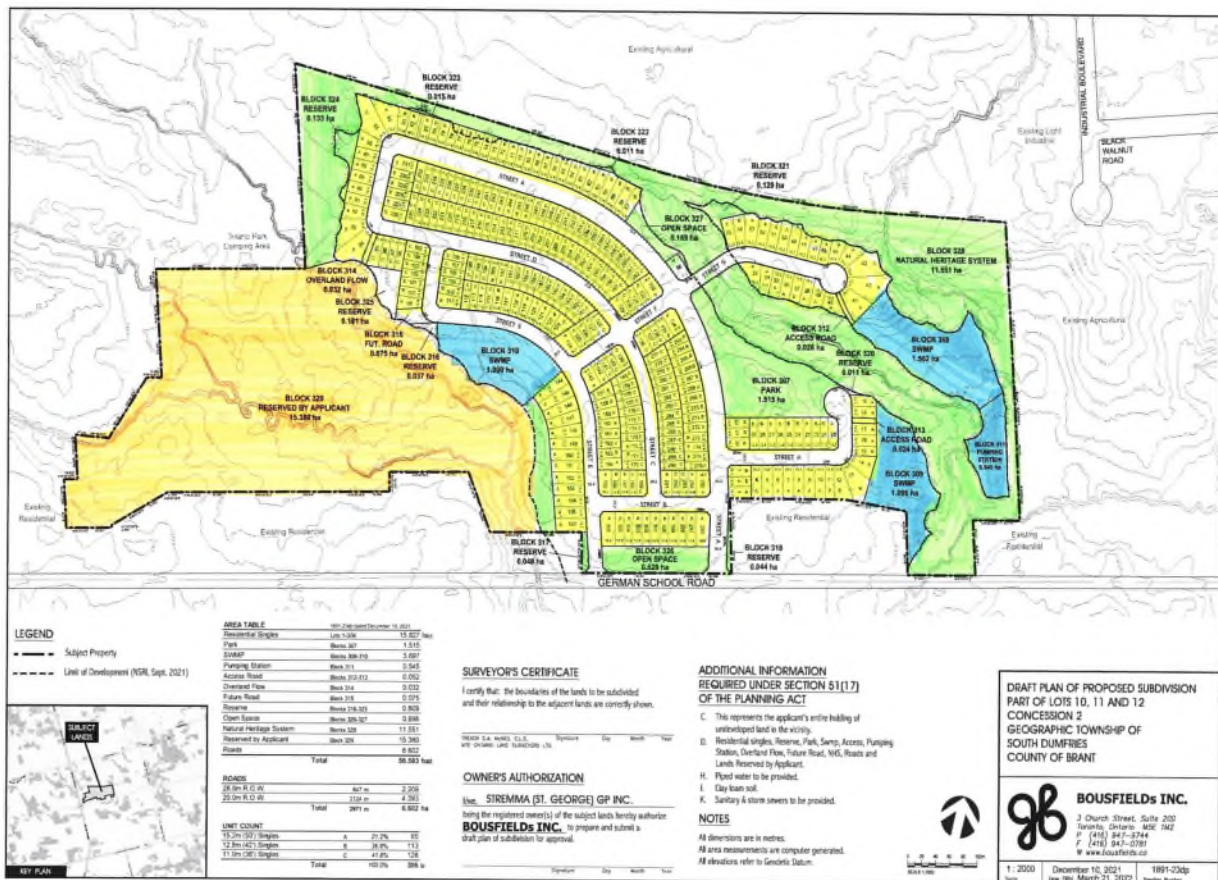
Finally, none of the revisions change the clear message that a residential intensification redevelopment of 269 German School Road is anticipated. As such, redesignation of the site to [Neighbourhood or Community Corridor] is appropriate to advance the intention reflected in the Site Specific Policy. In addition, it would be appropriate - in conjunction with such redesignation of 269 German School Road - to modify Site Specific Policy STG 1 as requested at the outset, and conclusion of this submission.

The Growth Plan and Land Needs Assessment Methodology Require Municipalities to Deliver a Market-Based Supply of Housing “To the Extent Possible” - Subject Site is an Opportunity to Deliver Market Responsive Housing On an Intensification Site in the Delineated Built-Up Area

The Growth Plan and the Provincial Policy Statement on Land Use Planning require that housing be delivered in a market based supply fashion. That includes delivering a full range and mix of housing types to meet market demand.

This was a change by the current Government from the policies of the previous Government - previous policies put the focus on limiting suburban development, and compelling development and new housing to be overwhelmingly in apartments. The current Government’s new policies were intended to more closely reflect what Ontario residents actually wanted as their housing.

The subject site represents a rare opportunity to deliver intensification in the Delineated Built-Up Area that also represents housing in a market-responsive form in grade-related housing, as Provincial Policy now seeks to include in the housing mix.



Brant County Municipal Comprehensive Review Land Needs Assessment Significantly Overestimates the Amount of Housing to be Delivered in Apartment Form - Underestimating the Need for Grade-Related Housing, When Compared With Hemson's Growth Forecasts for the Province

The Provincial Government commissioned Hemson Consulting to undertake the growth forecasts which are schedule 3 of the Growth Plan. As part of this exercise, Hemson produced a technical report explaining the forecasts, including forecasts by housing type by Municipality. This technical report is identified in the Land Needs Assessment Methodology as an appropriate market-based forecast of housing type growth by Region/County, for the period 2021 to 2051, for use in Land Needs Assessments.

The Hemson market-based forecast for Brant County foresees that all of Brant County's future growth would be met in the form of grade-related housing. (Any demand for apartments would be met within the neighbouring municipality - the City of Brantford, where 4,000 new apartments are anticipated - or approximately 14% of Brantford's unit growth over the horizon of the plan).

The Provincial Hemson forecast is dramatically at variance with the land needs assessment upon which the County's Official Plan is based. The County work foresees 23% of future growth being met in the form of apartments! (A figure even higher than Hemson's apartment growth forecast in the much more urban and dense City of Brantford).

While Hemson forecasts all County future growth being in grade-related housing, the County has calculated that a highly unrealistic 23% will occur in high density apartments . This deviation from the Hemson market-based forecast is so severe, that it demonstrates the extent to which the Brant County Official Plan does not reflect a market-based supply to the extent possible. Grade-related intensification opportunities in the built-up urban area, like the subject site, are being ignored. As a result, the County's Land Needs assessment work is not in conformity with the Growth Plan, and is not consistent with the Provincial Policy Statement on Land Use Planning.

Comparison of Land Needs Assessment Housing Mix By Units Growth to 2051 Plan Horizon

Type of Housing	Hemson Study	Brant County LNA
Grade-related	8,000	5,890
Apartments	0	1,775
Total	8,000	7,665

The above demonstrates that Brant County has significantly underestimated the need for land for grade-related housing when compared with Hemson’s technical growth forecasts for the province, while significantly over-estimating the demand for apartment housing. An effect of this deviation from a market-based forecast has been for the County to overlook the opportunity for the subject site to meet the actual demonstrated demand for market-based grade-related housing, at the same time as fulfilling policy objectives for intensification in the delineated built-up area.

In addition, it is worth noting that the Brant County forecast is 335 units lower than Hemson’s forecast. This number corresponds nicely to the 306 residential units proposed for the 269 German School Road site.

Brant County’s Land Needs Assessment Has Provided for Unusually Low Intensification in St. George When Compared with the Rest of The County - Development of the Subject Site Will Balance that Uneven Outcome

Brant County’s Land Needs Assessment work in their Municipal Comprehensive Review seeks to implement an intensification target of 20% (or 25% of the growth being in the delineated Built-Up Area of the Urban System of the County) - representing the amount of growth that should take place in the Delineated Built-Up Area.

However, the allocation of that growth by Policy Area in the Land Needs Assessment overwhelmingly commits that intensification to Paris, and Burford. Very little intensification is allocated to the Delineated Built-Up Area in St. George - in fact, only 5% of future growth in St. George is allocated to the Delineated Built-Up Area.

Proposed Allocation of Future Growth to Delineated Built-Up Area

Area	Units	Share of Growth
Paris	1,305	32%
St. George	84	5%
Burford	109	43%
Total Urban System	1,498	25%
Total Brant County	1,498	20%

The allocation of only 5% of St. George’s future growth to intensification - or to the Delineated Built-Up Area - is unusual, and inconsistent with the approach throughout the other parts of the urban system of the County - which are allocated from a third to more than 40% of their growth to intensification.

There is no justification for this imbalanced approach. It cannot be a lack of available land - the 269 German School Road site offers ample opportunity for additional intensification.

In fact, if the 306 units proposed for the site are added to the calculations, St. George would receive 390 new units in the form of intensification, out of a total forecast growth of 1,866 residential units . The intensification rate for St. George would become 16%.

Brant County’s Land Needs Assessment Work Actually Forecasts Declining Growth Rates From the Historical Annual Average Growth of 2.1% Down to 1.0%

While all indications are that growth in peripheral Greater Golden Horseshoe Area communities like Brant County is anticipated to increase with the passage of time, the Brant County Land Needs Assessment actually forecasts a decline in the rate of growth - with it actually falling by more than half over the horizon of the plan.

This assumption by Brant County in their work results in artificially low assumptions regarding growth in the future.

As a peripheral community, with good 400 series highway access to the more central areas of the the Greater Golden Horseshoe, Brant County can be expected to be an increasingly attractive destination for new homeowners - especially those seeking family-oriented grade-related housing. Such traditional homes are becoming shorter is supply as compared with demand - and as a result, places like Brant County where such detached housing can be delivered, are anticipated to experience growing demand in the future. This is particularly the case as immigration levels are anticipated to remain very high - at levels well-above those expected when the Growth Plan's current Schedule 3 population forecasts were adopted.

With these considerations in mind, the assumption of declining growth rates that Brant County has used in their Municipal Comprehensive Review work seems very unrealistic. The assumptions in Brant County's work area as follows:

Time Period Forecast Brant County Population Growth Rate

2016-2021 (Actual Historic Rate)	2.1%
2021-2026 (Forecast)	1.6%
2026-2031	1.3%
2031-2036	1.3%
2036-2041	1.1%
2041-2046	1.1%
2046-2051	1.0%

The use of these assumptions of declining growth rates into the future are not realistic in view of the actual growth Canada and Ontario continue to experience, and the continued high demand for grade-related housing. Of course, the result of using these low growth assumptions, despite the high historic growth rate, is to artificially depress the anticipated population forecasts, and resulting housing needs for Brant County.

The redesignation of the 269 German School Road site to allow for residential development will make a modest but helpful contribution to accommodating a more realistic expectation of the amount of growth Brant County can expect.

Servicing Capacity Will be Available in the Near Future in St. George Area, Allowing Housing to Be Built Quickly at 269 German School Road, As Anticipated by the Site Specific Policy

A Servicing Brief from MTE Engineers has been provided together with this submission. The Brief indicates that infrastructure improvements are anticipated to be completed in the near future that will be able to support the development of the 269 German School Road site.

In particular, MTE advises that Water Pollution Control Plant improvements required to support future growth in St. George are scheduled to begin construction in 2024, with their completion (and increased wastewater allocation) scheduled for 2026.

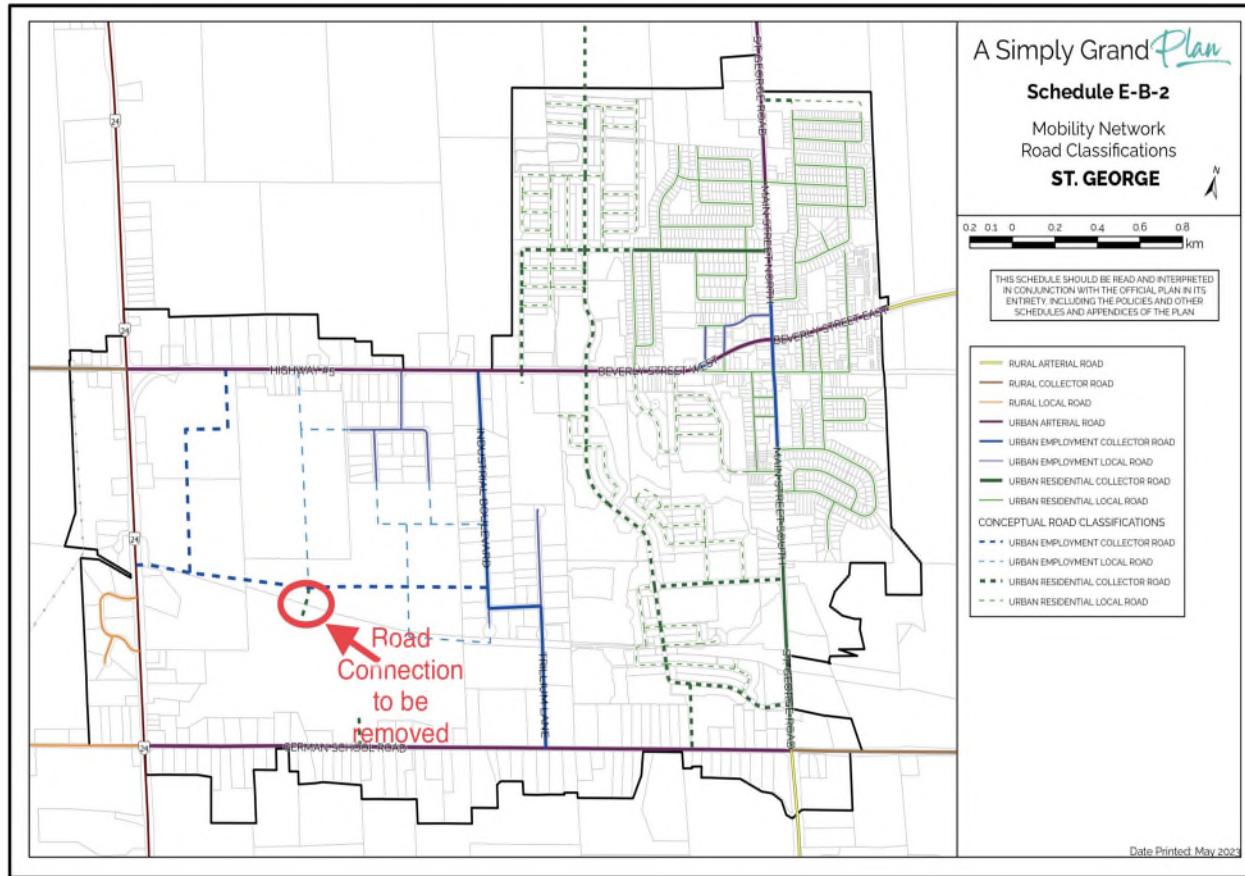
MTE also advises that the “St. George Trunk Sewer Installation project ... is also scheduled to be constructed by 2026”.

In their Servicing Brief, MTE concludes that “the subject lands can be adequately serviced with sanitary, water and storm services...”.

The Minister Should Modify The New Official Plan to Remove an Urban Residential Road Collector Connection that Will Attract Employment Area Traffic Infiltration into this Future Residential Neighbourhood

Brant County has proposed a north-south Urban Residential Collector Road into the subject site. According to the transportation consultant for the owner, it is likely that a significant volume of vehicular traffic from the employment area to the north will infiltrate into the subject site through this road connection, in large part due to the high forecast traffic levels on Highway 5. The connection is not required for the site to develop, and such infiltration into an otherwise quiet residential neighbourhood is undesirable.

As a result, the Minister is requested to modify the Schedule E-B-2 mapping to remove this Urban Residential Collector Road connection as shown below:



Proposal for 269 German School Road Will Deliver 306 Units of Much Needed Housing Supply in a Form that Will Meet Market Needs

The proposed redevelopment of 269 German School Road will deliver 306 Units of much needed housing. Ontario is in a housing supply crisis. There is a particularly strong demand for family-oriented housing in safe neighbourhoods in the Greater Golden Horseshoe.

The requested modifications will facilitate the delivery of this much-needed housing to the marketplace on an accelerated basis, providing new homes for 306 families, consistent with current provincial policy and priorities.

Province Can Modify the Adopted Plan, or Refer It to The Land Tribunal for a Hearing

Under section 3 of the planning act, the Minister, in carrying out his responsibilities and making planning decisions, must act in conformity with provincial plans (in this case the Growth Plan for the Greater Golden Horseshoe), and consistent with the Provincial Policy Statement on Land Use Planning. A decision to approve the Official Plan adopted by Brant County Council will not be consistent with the Provincial Policy Statement, and will not conform with the Growth Plan.

The Provincial Policy Statement in policy 1.1.1.b) requires municipalities to accommodate a “*market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing and housing for older persons)*”.

The Brant County Official Plan does not provide this market-based range and mix including single-detached housing. In addition, it misses key opportunities to deliver intensification in the Delineated Built-Up Area, including while delivering market-based housing as proposed for 269 German School Road.

As a result, we are requesting that the Minister modify the land use designation applicable to 269 German School Road (The Oaks of St. George Golf Course) to **Neighbourhood**.

In addition to the redesignation of the lands, St. George Site-Specific Policy Area - STG1: the Oaks of St. George, should be modified to read as follows:

4.2 St. George Site-Specific Policy Areas

Site-Specific Policy Area – STG1: The Oaks of St. George

4.2.1 Notwithstanding the contextual statements and policies of this Plan, it is not to be interpreted that Site Specific Policy Area STG1 is of a lower priority for growth and development to the horizon of this Plan.

4.2.2 To permit redevelopment of the lands subject to Site Specific Policy Area STG1, a zoning change shall be required. Any proposed zoning change shall be subject to all applicable policies of this Plan, including STG1(4.2.1). Further, notwithstanding the contextual statements and policies of this Plan, for new residential development, a Planning Justification will be required to support the rezoning.

4.2.3 Redevelopment of Site-Specific Policy Area STG1 for new residential development shall not be subject to the preparation and approval of an Area Study or a Secondary Plan.

4.2.4 The County shall maintain a limited reserve capacity that provides for infill and intensification to occur, as contemplated, in STG1 with a minimum of 7.5 percent of the total servicing capacity to be reserved and allocated for this and other infill and intensification within the built boundary of St. George as shown on Schedule A – Land Use – St. George to this Plan, in order to assist the County in meeting its minimum intensification target. However, if the reserve capacity has not been utilized within five years of the STG1 lands being rezoned, the County may re-allocate the remaining reserve capacity to development-ready lands at the County’s discretion and in accordance with the approved servicing allocation policy.

Finally, the new Official Plan proposes an Urban Residential Collector Road connection into the subject site from the employment land from the north. We are requesting that the map in Schedule E-B-2 of the new Official Plan be modified to remove the Urban Residential Collector Road connection into the site from the north.

In the alternative, the Minister could refer the matter of the appropriate designation for the lands, the contents of the Site Specific Policy STG1, and the appropriateness of the Urban Residential Collector Road connection into the site, to the Ontario Land Tribunal for a hearing.

Yours sincerely,



AIRD & BERLIS LLP

Hon. Peter Van Loan
Partner

HV

cc: kirstin.jensen@ontario.ca - Deputy Chief of Staff
david.stubbs@ontario.ca - Community Planning and Development - West