



August 25, 2023

Nick Gougoulas  
Stremma Developments (St. George) GP Inc.  
91 Caldari Road, Unit 1  
Concord, ON · L4K 3Z9

Dear Nick,

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

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We are the planning consultants for Stremma Developments (St. George) GP Inc. who is “the Owner” of a parcel municipally addressed as 269 German School Road, in the urban settlement area of St. George in the County of Brant (“**subject site**”). The purpose of this letter is to provide a planning rationale in support of requested modifications to the new 2023 Brant County Official Plan (the “**New Brant OP**”), which is currently before the Minister of Municipal Affairs and Housing (the “**MMAH**”) for approval. The following will outline the requested modifications, provide background information related to the subject site, and outline our planning rationale for the requested modifications.

## **1.0 REQUESTED MODIFICATIONS**

In our opinion, the New Brant OP in its current form is not consistent with the Provincial Policy Statement (the “**PPS**”), does not conform to the Growth Plan for the Greater Golden Horseshoe (the “**Growth Plan**”), and does not represent good land use planning as it relates to the subject site. Accordingly, it is our opinion that the following modifications should be made to the New Brant OP:

1. Re-designating the subject site from “*Parks and Open Space*” to “*Neighbourhoods*”, while maintaining the *Natural Heritage System, Regulatory Floodplain, and Watercourse* overlays on Schedules A and A-2.
2. Remove the *Urban Residential Collector Road* connection at the north end of the subject site from Schedules E-B and E-B-2.

In our opinion, these proposed modifications would make the New Brant OP consistent with the PPS, conform to the Growth Plan, and represent good planning.

## **2.0 BACKGROUND INFORMATION**

The Owner of the subject site participated in the appeals of Official Plan Amendment 8 (the “**OPA 8**”) to the existing and in-force 2012 Brant County Official Plan (the “**Existing Brant OP**”), which updated the Existing Brant OP in order to, among other things, establish a growth management land use strategy for St. George. In this regard, an OLT settlement hearing decision and order were issued on November 20, 2020 (Case No. PL180470), resulting in the creation of a new site-specific policy area for the subject site (i.e., SSPA 26) and modifications to OPA 8. The SSPA 26 policies and modifications to OPA 8, which are now in effect, recognize that the subject site is a priority for growth and development and stipulates that a minimum of 7.5 percent of the total servicing capacity is to be reserved and allocated for infill and intensification within St. George, including the subject site.

On December 14, 2020, a pre-consultation application was filed with the County regarding the proposed development of the subject site for a residential draft plan of subdivision. On May 6, 2021, a pre-consultation meeting was held with County Staff regarding the proposal and the meeting minutes established the submission requirements for the proposed applications.

On March 28, 2022, an official plan amendment, rezoning and draft plan of subdivision applications (the “**Applications**”) were filed for the subject site. The Applications including the following supporting studies and plans:

- Draft Plan of Subdivision, prepared by Bousfields Inc.
- Draft Official Plan Amendment, prepared by Bousfields Inc.
- Draft Zoning By-law Amendment, prepared by Bousfields Inc.
- Planning and Urban Design Rationale, prepared by Bousfields Inc.
- Comprehensive Development Master Plan, prepared by Bousfields Inc.
- Urban Design and Accessibility Study, prepared by Bousfields Inc.
- Stage 1 Archaeological Study, prepared by Earthworks Archaeological Services Inc.
- Stage 2 Archaeological Study, prepared by Earthworks Archaeological Services Inc.

- Transportation Impact Study and Parking Analysis, prepared by Salvini Consulting
- Comprehensive Environmental Impact Study, prepared by Natural Resource Solutions Inc.
- Landscape Plans, prepared by Adesso Design Inc.
- Fluvial Geomorphological and Erosion Threshold Assessment, prepared by Water's Edge Environmental Solutions Team
- Functional Servicing Report, prepared by MTE Consultants Inc.
- Hydrogeological Assessment Report, prepared by MTE Consultants Inc.
- Preliminary Stormwater Management Report, prepared by MTE Consultants Inc.
- Preliminary Geotechnical Investigation, prepared by Peto MacCallum Ltd.
- Boundary and Topographic Survey, Prepared by MTE Consultants Inc.

As the County failed to render a decision on the Applications within the legislated timelines, they were appealed and are currently before the OLT with a hearing scheduled for June 2024.

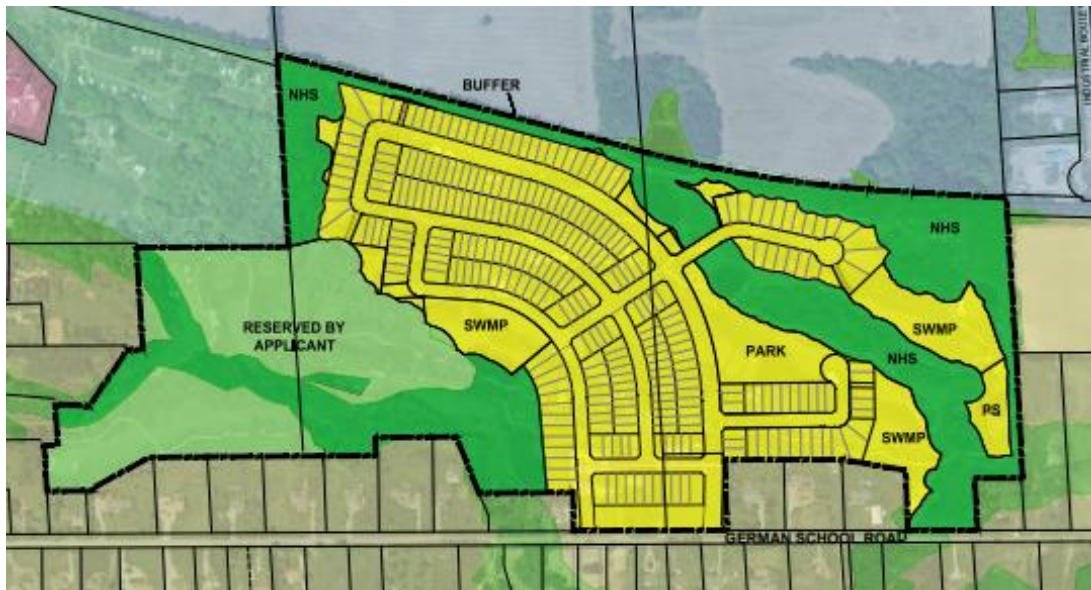
### 3.0 DEVELOPMENT APPLICATION PROPOSAL

The proposed plan of subdivision includes the redevelopment and intensification of the subject site for *Neighbourhood* uses including single detached residential dwellings (306 lots), a public park, three stormwater management ponds, eight new public roads, and an infrastructure block for a pumping station. The existing natural heritage system will be maintained and protected with appropriate buffers.

The following table provides a breakdown of the proposed Draft Plan of Subdivision:

Land Use	Area (ha)	%
Residential	15.827	28.0%
Park	1.515	2.7%
SWMP	3.697	6.5%
Pumping Station	0.545	1.0%
Reserve	0.609	1.1%
Open Space	0.698	1.2%
Natural Heritage System	11.551	20.4%
Reserved by Applicant	15.380	27.2%
Public Roads	6.602	11.7%
<b>TOTAL</b>		<b>100%</b>

The following is an illustration of the proposed draft plan of subdivision:



#### 4.0 PLANNING RATIONALE FOR REQUESTED MODIFICATIONS

It is our opinion that the New Brant OP should not be approved as currently proposed as it relates to the subject site, since it is not appropriate, is not consistent with the PPS, does not conform to the Growth Plan, and is not consistent with the principles, structure and policies of the Existing and New Brant OP. Provincial planning policy mandates an intensification first approach, prioritizing development of underutilized sites within the *built boundary* and especially sites like the subject site, which can accommodate a significant amount of residential development including the availability of servicing capacity. Also, the Existing Brant OP recognizes that the subject site represents an intensification opportunity that is a priority for growth and development. Furthermore, it has reserved a minimum amount of servicing capacity for the subject site and other infill and intensification opportunities in St. George. As a result, the redesignation of the subject site to *Neighbourhoods* would have the effect of supporting the proposed development of 306 new single detached residential dwellings and a community service facility (park) to the County and redeveloping an underutilized site in the *built-up* Urban Area, while protecting and enhancing the Natural Heritage System.

#### 4.1 Intensification

The redesignation of the subject site to *Neighbourhoods* and the proposed Draft Plan of Subdivision will result in the intensification of the subject site via the replacement of non-residential uses (golf course) with compatible residential development within the built boundary of a settlement area. More specifically, the proposed development will result in the creation of a new residential community with 306 new residential building lots. These new lots will contribute to the provision of new housing options for the community of St. George and the County.

Intensification on the subject site is consistent with the PPS and conforms to the Growth Plan. More specifically, it is consistent with policies 1.1.1, 1.1.2, 1.1.3.1, 1.1.3.2, 1.1.3.3, 1.1.3.4, 1.1.3.5, 1.1.3.6, 1.1.3.7, 1.4.1, 1.4.3, 1.5.1, 1.6.7, and 1.7.1 of the PPS and conforms to policies 1.2.1, 2.2.1, 2.2.2, 2.2.6, 4.1, 4.2.2, 4.2.3, 4.2.4, and 4.2.5 of the Growth Plan. In this regard, these provincial policies require municipalities to:

- establish and implement minimum intensification targets;
- maintain the ability to accommodate residential growth for a minimum of 15 years;
- permit and facilitate all types of residential intensification;
- optimize the long-term availability and use of land, resources, infrastructure, and public service facilities;
- prioritize intensification;
- direct the vast majority of growth to settlement areas and focused in delineated *built-up areas*;
- establish minimum intensification targets, which for St. George, Brant is 20 percent; and,
- identify mechanisms to support the implementation of intensification targets.

The subject site represents the largest parcel within the *built-up area* with a significant opportunity to accommodate residential intensification within St. George. It will help the County achieve its intensification target and accommodate residential growth in the short term. The requested modification to the New Brant OP will support the implementation of the intensification target and help facilitate a significant amount of residential intensification within St. George and the County.

## 4.2 Land Use

The proposed redevelopment and requested modifications to the New Brant OP will provide for the residential intensification of the subject site and urbanize an underutilized site in the *built boundary*. In this regard, the existing designations, and especially the primary “Parks and Open Space” designation, restricts the range of permitted uses to public parks, public recreational facilities, public community facilities, conservation areas, exhibition grounds, open spaces and limited private commercial recreational facilities such as golf courses, fee fishing, campgrounds and amusement parks. As the subject site is a private golf course owned by a private corporation, its redevelopment and intensification opportunities are limited under the current designations. In our opinion, a redesignation is appropriate and desirable in that redevelopment of the subject site for residential purposes can help achieve the County’s intensification and growth objectives.

The surrounding lands are proposed in the New Brant OP, as adopted, to be designated “Community Corridor” to the south, “Community Corridor” and “Community Node” to the west, “General Employment” and “Community Corridor” to the north and “Suburban Residential” and “Community Corridor” to the east. In this regard, the pattern of development in the *built-up* area of St. George consists of large lot suburban residential and general commercial uses along higher order roads, including German School Road and Brant Road with “Neighbourhood” uses internal and away from higher order roads. In our opinion, the redesignation of the subject site to “Neighbourhoods” is appropriate and desirable for the following reasons:

- It is generally consistent with the pattern of development in St. George;
- It is compatible with the surrounding existing and planned surrounding land uses, including appropriate buffers and separation from the planned “General Employment” uses to the north;
- It will assist the County in achieving its intensification and growth objectives;
- Establishing new “Urban Residential” uses near existing and planned general commercial and “General Employment” uses is appropriate, desirable and achieves the objectives of a complete community; and,
- Replacing a private golf course within the *built up area* with new residential dwellings and a park to accommodate the County’s growing population is appropriate and desirable in land use planning terms.

The redevelopment of the subject site for low-rise residential uses is part of a desirable process of urbanization that will result in a more intensive form of development that will create a new low-rise residential neighbourhood nestled in nature with significant opportunities for public trails and open space and near commercial amenities and employment uses.

### **4.3 Infrastructure Support**

Both the Existing and New Brant OP establish a limited reserve capacity for infill and intensification with St. George. More specifically, Policy 4.2.4 of the New Brant OP states:

*“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 reallocate the remaining reserve capacity to development-ready lands at the County’s discretion and in accordance with the approved servicing allocation policy.”*

The New Brant OP specifically provides for infrastructure support for intensification within St. George. The requested modification will allow the County to make use of the reserved capacity through a significant intensification development that will utilize much of the 7.5 percent within the timeline. In our opinion, if the subject site is not developed for residential purposes, it is unlikely that the reserve capacity will be fully utilized for intensification and instead it may be directed to planned *greenfield* development, which is contrary to provincial policy, which prioritizes and mandates minimum amounts of intensification.

### **4.4 Transportation**

The requested modification to remove the *Urban Residential Collector Road* connection at the north end of the subject site from Schedules E-B, and E-B-2 is appropriate and desirable for the reasons outlined in the letter prepared by Salvini Consulting, dated August 4, 2023. More specifically, the analysis completed by Salvini Consulting concluded the following:

- The transportation work undertaken by the County for the Masterplan work for St. George does not provide justification for the collector road connection at the north end of the subject site.
- It is not appropriate to allow a road connection that would have a potential transportation impact to add industrial traffic through a residential neighbourhood.
- The County's proposed road 6 that would connect the subject site to the industrial lands to the north should be deleted.

Should you require any additional information or clarification, please feel free to contact the undersigned at [dfalletta@bousfields.ca](mailto:dfalletta@bousfields.ca) or 905-549-3005.

Respectfully submitted,  
**Bousfields Inc.**



**David Falletta MCIP, RPP**  
Partner

DF:jobs

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