

File No. 16232

August 17, 2023

Ministry of Municipal Affairs and Housing
Municipal Services Office – Western Ontario
659 Exeter Road, Floor 2
London, ON N6E 1L3

**Re: County of Brant – New Official Plan
County of Brant Council Adoption – May 30, 2023**

GSP Group provides planning advice to Paris Grand Estates Inc. (“**Paris Grand**”), the proponent of the Paris Grand Estates Subdivision (the “**PGE Subdivision**”) located in Paris, County of Brant (the “**County**”).

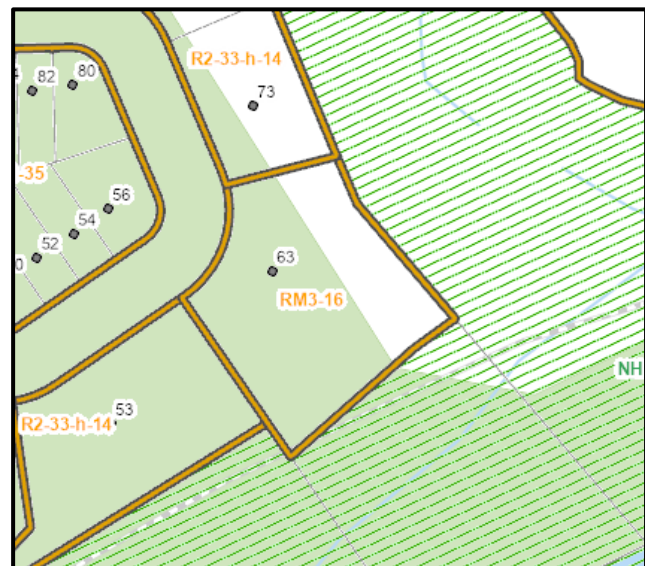
On behalf of Paris Grand, we reviewed the County of Brant Official Plan (“**County OP**”) as released in April 2023, provided written correspondence to the County and made a delegation at the May 29, 2023, County Council Meeting. We have since reviewed the adopted version of the County OP.

The purpose of this letter is to provide further comments regarding two aspects of the adopted County OP which were raised in our comment letters (attached for reference) but that remain unaddressed.

The Riverhouse

The Riverhouse is an existing five-room inn that is located on Block 127 of the PGE Subdivision and is zoned RM3-16 (see right).

The 2012 Official Plan provides a site-specific policy in s. 4.2.1(ii) which recognizes the function of the Riverhouse. The unique nature of the Riverhouse should continue to be recognized through a special policy, applicable to Block 127 of the PGE Subdivision.



A special policy should be added to section 4.1 of the County OP and would read as follows:

Site Specific Policy Area – PS#: River House

4.1.x Notwithstanding anything to the contrary, the lands designated SSPA – PS# shall permit a hotel, along with related recreational, social, educational and conference room ancillary uses in addition to other uses permitted by the Neighbourhoods designation.

A coordinate adjustment would be required to Schedule A-1 to identify the Riverhouse as a special policy area.

Growth Management and Servicing

Paris is identified as a Primary Settlement Area. The County OP directs a majority of growth to Primary Settlement Areas which is consistent with Provincial policy.

Part 3, Section 10.1.2 confirms that the County will prepare a Servicing Allocation Strategy for Primary Settlement Areas. Part 3, Section 10.1.3 requires:

All development is to be staged or phased, and the staging/phasing and servicing of each stage/phase of development may proceed when the County is satisfied that all of the external infrastructure/services for that stage/phase are in place, which means that the infrastructure exists and is operational to the satisfaction of the County and that capacity in such infrastructure has been formally allocated by the County for use in connection with the Development.

Part 5, Section 5.7.3 states that:

Draft approved subdivisions shall only be registered if sufficient servicing capacity exists, or a servicing agreement is in place.

To help reconcile Part 3, Section 10.1.3 and Part 5, Section 5.7.3, the earlier policy should be modified so its true intent is clearer. It should read:

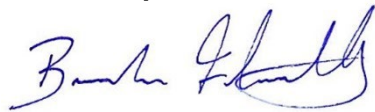
All development is to be staged or phased, and the staging/phasing and servicing of each stage/phase of development may proceed when the County is satisfied that all of the external infrastructure/services for that stage/phase are feasible.

We are supportive of Part 5, Section 5.7.4 which requires the County to demonstrate a commitment to the expansion of servicing facilities prior to their reaching capacity.

Conclusion

We thank you for the opportunity to provide comments and would welcome the opportunity to review the proposed policy changes with Ministry Staff.

GSP Group Inc.

A handwritten signature in blue ink, appearing to read "Brandon Flewwelling".

Brandon Flewwelling, MCIP, RPP
Manager, Development Planning

- cc. Pam Duesling – General Manager of Development Services, County of Brant
- Jennifer Boyer – Manager of Policy Planning, County of Brant
- Kathy Di Silvestro – Crystal Homes
- Alex Lusty – Davies Howe LLP