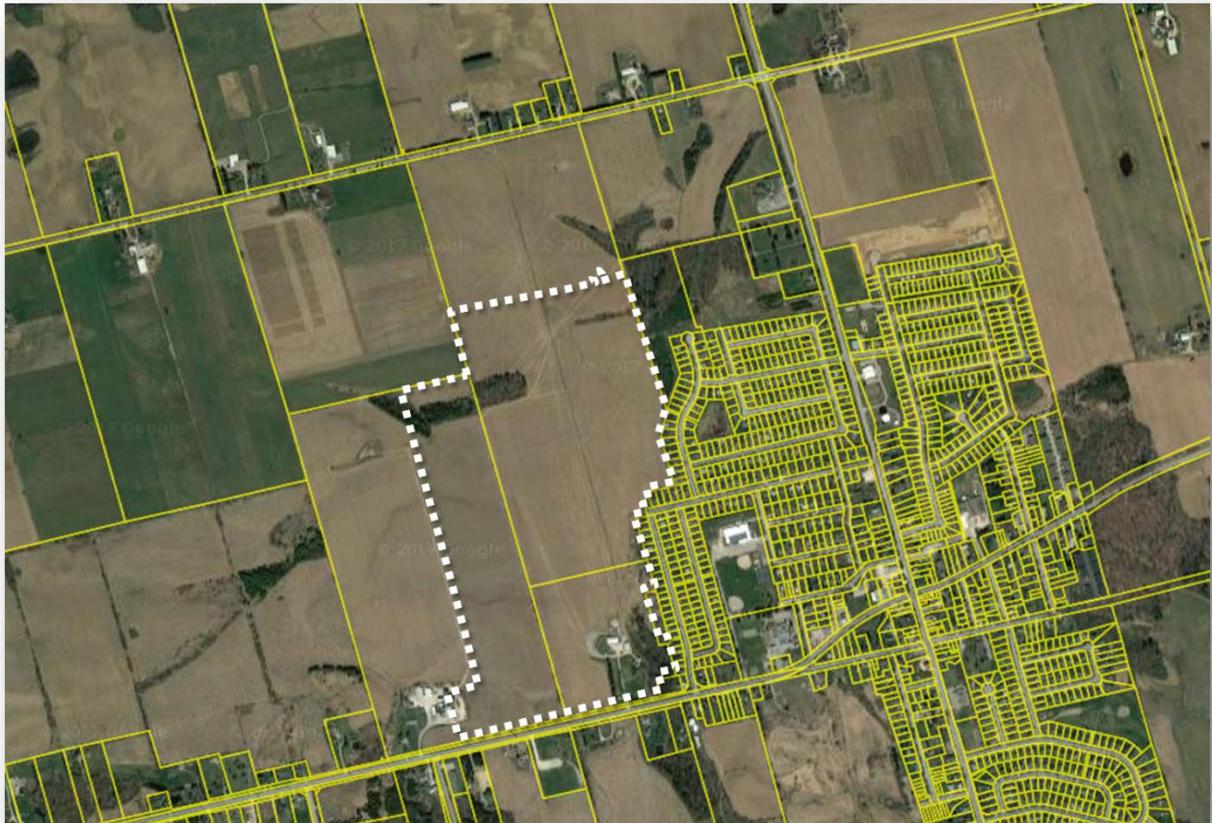


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PLANNING JUSTIFICATION REPORT

EMPIRE'S ST. GEORGE SUBDIVISION
County of Brant



Prepared For:
Empire Communities (St. George) Ltd.
August 2017

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NOTE: This Planning Justification Report has been updated to reflect recent changes to newly released provincial policies (Growth Plan for the Greater Golden Horseshoe (2017), proposed draft plan of subdivision and updated servicing reports and is meant to replace earlier versions of the report (2008 and 2015).

0.0 SUMMARY

The enclosed Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications are being filed on behalf of Empire Communities (St. George) Ltd. and Mr. Brian and Maree Loveless for a proposed subdivision including a maximum of 1291 residential units consisting of a mix of detached dwellings, townhouses, mixed use blocks and a large greenspace network. The Subject Site consists of 66.83ha (165.14 acres) of land within the existing St. George Primary Urban Settlement Area Boundary.

The County of Brant Official Plan states that Primary Urban Settlement Areas “shall function as the main areas for growth, development and urban activities...”. The proposed subdivision would focus growth directly adjacent to the built up area of St. George and implement the logical expansion of the existing community. Development of these lands, as proposed, will support and create a complete community including a variety of housing forms, opportunities for commercial uses and/or alternate residential units within three mixed use blocks and an expansive and integrated greenspace network that provides opportunity for active and passive recreation, while ensuring the protection of natural and archaeological features.

Planning applications were originally made and deemed complete in 2008, but were put on hold pending completion of an Area Study. As requested by the County, Empire Communities joined and managed the St. George Land Owners Group (LOG) and over six (6) years completed the St. George Area Study which was approved by Council on May 27, 2014. Since that time, Council has also approved the completion of a water and wastewater Municipal Class Environmental Assessment to determine the scope of improvements needed to upgrade the existing water supply and distribution system and the wastewater treatment plant. These upgrades will benefit both the existing residents, as well as new home owners within the Serviced Area Boundary proposed through the Area Study.

Phasing of the proposed development is generally expected to occur from the south to the north but this may be revised as planning and engineering design progresses and housing needs within the community are identified.

The County of Brant Official Plan (2012) designates the subject lands as “Urban Residential” and “Natural Heritage Systems” and the County’s Zoning By-law (61-16) currently identifies the lands as “Agricultural” (A, A-92 and A-99) and “Natural Heritage” (NH). Amendments to the official plan contemplated through the enclosed applications would permit Mixed Use along County Highway 5 (as approved through the St. George Area Study approved by Council in 2014) and provide minor

revisions to growth related policies; amendments to existing zoning would reflect the change in use of land from “Agricultural” to “Residential” and “Mixed Use” (with special provisions) and implement policy objectives of the Province and the County. Specifically, meeting policies related to land use, growth and density, housing and development.

In summary, the proposed Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications represent good land use planning, are consistent with the Provincial Policy Statement and conform to the Growth Plan, and we recommend their approval.

1.0 INTRODUCTION

Armstrong Planning & Project Management is acting as agent on behalf of Empire Communities (St. George) Ltd. and Brian and Maree Loveless in support of Draft Plan of Subdivision (File No. PS2/08), Zoning By-law Amendment (File No. ZBA 10/08) and Official Plan Amendment (File No. OPA-B08) applications for lands known as Part of Lots 8 and 9, Concession 3, in the Geographic Township of South Dumfries, County of Brant (“Subject Site”). For the purposes of this report, we will refer to lands owned by both proponents as the “Empire lands” or “Empire subdivision”. All three applications were deemed complete on November 6th, 2008. This revised Planning Justification Report is intended to update the second revision of the report submitted in 2015 and act in support of the development as currently proposed (revised: 2017).

We recognize that review of the above noted applications had been put on hold until the approval of the St. George Area Study; however, on May 27, 2014, Council approved the St. George Area Study in support of future development in St. George. At this time we respectfully request that County staff circulate the revised materials enclosed with this (re)submission (submission #3) and with materials circulated in 2008 and 2015 (if/as necessary) to continue the review process in support of the necessary planning approvals. As previously discussed, we request that, subject to sign off from staff and other commenting agencies, the applications be approved (with condition) prior to completion of necessary servicing upgrades so that the lands are “shovel ready” once capacity is available.

The current re-submission reflects a revised Draft Plan (minor revisions) and addresses new technical and environmental information made available as well as recently updated policies and legislation including the Growth Plan for the Greater Golden Horseshoe (2017).

The proposed development site is located north of County Highway 5 and west of Scott Street and Hampton Court (Figure 1) and is approximately 66.83 hectares (165.1 acres) in area. If approved, the proposed development will consist of approximately 1,291 residential units in a variety of housing forms, including detached dwelling units, townhomes and three (3) mixed use blocks. The proposed lands are designated “Urban Residential” and “Natural Heritage Systems” in the Official Plan (OP) and zoned “Agricultural” and “Natural Heritage”.

Official Plan and Zoning By-law Amendments are required to facilitate approval of the proposed residential development and are enclosed as Appendices B and C to this report. Furthermore, a Draft Plan of Subdivision application is required and was included as part of the original submission; at this time we are submitting a revised Draft Plan of Subdivision (as of April 11, 2017).

1.1 Supporting Documentation

In support of the proposed development and the subject applications, the following revised materials are included with this re-submission (#3):

- Revised Draft Plan of Subdivision, prepared by Armstrong Planning & Project Management, dated April 11, 2017 (10 copies);
- Revised Planning Justification Report prepared by Armstrong Planning & Project Management dated August 23, 2017 (10 Copies);
- Revised Functional Servicing and Stormwater Management Report, prepared by SCS Consulting Group, dated August 2017 (10 Copies);
- Revised Official Plan Amendment (Appendix B of the Planning Justification Report);
- Revised Draft Zoning By-law (Appendix C of the Planning Justification Report); and
- 1 CD including digital copies of all of the above mentioned materials.

2.0 SITE LOCATION & CONTEXT

2.1 General Location

The subject site is located in the north-west region of the St. George Settlement Area in the County of Brant (Figure 1) and is strategically located between the City of Cambridge (20km north) and the City of Brantford (15km south). It is a natural progression for growth in St. George and is located to the west of the existing built-up community, north of Highway 5 and west of Scott Street and Hampton Court. The proposed subdivision connects to the existing community through the extension of Andrew Street and supports needed upgrades to existing water and wastewater infrastructure.

2.2 Description of Subject Site & Surrounding Area

The subject site consists of approximately 66.83ha (165.1 acres) of land inside the St. George Settlement Area Boundary. Specifically, Empire owns 55.2ha (136.4 acres) and Mr. Brian and Maree Loveless own 11.6ha (28.6 acres). Empire also owns an additional 138ha (342 acres) of land to the west and north of the Settlement Area boundary (Figure 2). Additional lands owned by Empire that are outside of the settlement boundary are not part of this application.

The subject site is currently identified as “Urban Residential” and “Natural Heritage System” within Schedule A-2 (Land Use Plan-St. George) of the County of Brant Official Plan (2012); however, the lands are currently being used for agricultural purposes.

The subject site is generally rectangular in shape, has approximately 620m of frontage along Highway 5 and is approximately 1,200m deep extending north from County Highway 5 to the edge

of the settlement boundary; topography generally slopes from the north-west to south-east. The lands include a large woodlot in the North West and a wetland within valley lands to the south east. Confirmation and delineation of developable lands was completed based on information presented in the Environmental Impact Statement and Addendum (2008 and 2015), the Natural Heritage Report completed in support of the St. George Area Study (2014) and in response to revised/updated federal, provincial and municipal policies. Lands not intended for development have been included in a variety of Open Space blocks and the remaining land has been designed to create a complete community of detached and attached homes with three mixed use blocks connected by a network of new local roads.

Agricultural lands are located to the north and west of the site while the existing community of St. George is located to the east and south-east. South of Highway 5, existing land uses include agricultural, recreational, some residential and industrial (Figure 2).

3.0 PROPOSED DEVELOPMENT

3.1 Development Proposal: Empire St. George Subdivision

As previously stated, the proposed residential and mixed use development will consist of a mix and range of detached dwellings and townhomes totalling a maximum of 1,291 units (Figure 3). A mix of dwelling types is dispersed throughout the proposed development to ensure that a variety of dwelling types (lot/unit size) are available as each phase is built out allowing Empire to respond to local and regional market demands.

The proposed Draft Plan incorporates these areas into a comprehensive green network (Figure 4):

- 2.00ha (4.94 acres) of active parkland,
- 5.10ha (12.6 acres) of open space for passive recreation,
- 2.12ha (5.24 acres) of protected woodlot,
- 6.56ha (16.21 acres) of protected open space; and
- 3.41ha (8.43 acres) of open space for stormwater management.

TOTAL: 19.19 ha (47.4 acres)

There are also three mixed use blocks (3.60ha or 8.90 acres) that may accommodate a variety of uses, including residential, adjacent to County Highway 5 (Figure 3). The remaining lands are residential and proposed to accommodate detached homes and townhomes in a range of sizes supporting the creation of a complete community.

The proposed development is serviced by two (2) stormwater management ponds both located in the south end of the proposed development lands. As outlined further in the Functional Servicing and Stormwater Management Report (FSSR), the stormwater management ponds have been designed to manage on-site stormwater and to accommodate stormwater from lands outside of the current settlement area boundary to the north and north-west of the proposed development site.

3.2 Draft Plan of Subdivision

The Draft Plan of Subdivision proposed for the subject site represents a logical expansion of the existing community of St. George through the extension of Andrew Street and proposes a pedestrian friendly road and green space network (Figure 4 and 5). It provides a range of housing types and densities and is consistent with objectives of the Provincial Policy Statement (2014) and conforms to policies of the Growth Plan and Places to Grow Act (2017) and the County of Brant Official Plan (2012). Furthermore, the Draft Plan of Subdivision has regard for criteria outlined in Section 51(24) of the Planning Act including but not limited to the provision of adequate services, roads, proposed lots and the conservation of environmental lands.

Table 1 outlines the proposed unit breakdown by type for Empire’s proposed St. George development. In order to maximize flexibility the Draft Plan includes lotless blocks which identify a minimum lot frontage and a maximum number of lots within each development block. This format is widely used and accepted in neighbouring municipalities, including Brantford and Hamilton.

Table 1: St. George Development: Dwelling Units by Type

Lands	Draft Plan of Subdivision		
	Block Plan	Area (ha)	Maximum Number of Lots
Residential Singles 12.0m	11, 13, 23-26, 28-29, 31, 50, 53, 74-75	4.86	120
Residential Singles 10.0m	2-3, 7-10, 14-15, 21, 27, 30, 32, 34, 36-37, 40, 43, 46, 52, 57-60, 64-65, 72-73	9.56	293
Residential Singles 8.0m	4-6, 12, 16, 18-20, 22, 33, 35, 39, 41-42, 47-49, 51, 54-56, 62-63, 66, 68-71	10.09	398
Townhomes 6.0m	1, 17, 38, 44-45, 61, 67	2.42	120
Mixed Use ¹	76-78	3.60	360
Total	1-78	30.53	1,291

¹ To be consistent with Official Plan 3.4.6-b, the maximum density of new High Density Urban Residential development shall not exceed 100 units per net hectare.

3.3 Phasing Plan

The proposed development is contemplated as being implemented in five (5) phases (Figure 6). The preliminary phasing plan is set out to assist with the logical staging of services and to appropriately respond to the market as each phase is built. Phasing may change over time as the plan evolves and is being presented on a preliminary basis only. Table 2 outlines the unit breakdown by type and phase for Empire’s proposed St. George subdivision.

Table 2: St. George Development: Dwelling Units by Type per Phase

Lands ¹	Detached Units			Townhouse Units	Mixed Use	Total
	8.0m	10.0m	12.0m	6.0m	n/a	
Phase 1	55	56	20	0	191	322
Phase 2	131	59	22	36	0	248
Phase 3	120	59	21	32	0	232
Phase 4	24	73	57	16	0	170
Phase 5	68	46	0	36	169	319
Total	398	293	120	120	360	1291

¹ Based on Draft Plan of Subdivision, dated April 11, 2017

4.0 PROVINCIAL POLICIES

4.1 Provincial Policy Statement (2014)

The Provincial Policy Statement (PPS; 2014) came into effect on April 30, 2014, replacing the PPS issued March 1, 2005 and provides direction on matters of provincial interest related to land use planning and development. It also sets out the policy foundation for regulating the development and use of land (Part 1, PPS, 2014).

The PPS (2014) focuses growth and development, manages land use to accommodate appropriate development patterns and promotes a mix of housing, employment, recreation, parks and open space systems in new and existing developments. Specifically, the PPS identifies three primary policy areas of concern: (1) Building Strong Healthy Communities; (2) Wise Use and Management of Resources; and (3) Protecting Public Health and Safety. It also provides direction on how to implement and interpret the plan.

Policies related to growth and intensification, as outlined in the proposed subdivision include:

1. BUILDING STRONG HEALTHY COMMUNITIES:

Section 1.1.3 of the PPS provides the following policy provisions that support the proposed development with respect to the issue of intensification and growth:

1.1.3.2 Land use patterns within *settlement areas* shall be based on:

- a) densities and a mix of land uses which:
 - 1. Efficiently use land and resources;
 - 2. Are appropriate for, and efficiently use, the *infrastructure* and *public service facilities* which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;
 - 4. Support *active transportation*;
- b) a range of uses and opportunities for *intensification* and *redevelopment* in accordance with the criteria in policy 1.1.3.3 where this can be accommodated.

1.1.3.3 Planning authorities shall identify appropriate locations and promote opportunities for *intensification* and *redevelopment* where this can be accommodated taking into account existing

building stock or areas, including *brownfield sites*, and the availability of suitable existing or planned *infrastructure* and *public service facilities* required to accommodate projected needs.

1.3.3.4 Appropriate development standards should be promoted which facilitate *intensification*, *redevelopment* and compact form, while avoiding or mitigating risks to public health and safety.

1.1.3.6 New development taking place in *designated growth areas* should occur adjacent to the existing built-up area and shall have a compact form, mix of uses and densities that allow for the efficient use of land, *infrastructure* and *public service facilities*.

The proposed subdivision is currently located within the St. George Settlement Area boundary and represents good land use planning by creating land use patterns that are compact, appropriate for the area, make efficient use of proposed infrastructure and support active transportation through the creation of a large green space and optional trail network.

Section 1.4 of the PPS provides the following policies about the provision of appropriate forms of housing:

1.4 To provide for an appropriate range of housing types and densities required to meet projected requirements of current and future residents of the *regional market area*, planning authorities shall:

- a) maintain at all times the ability to accommodate residential growth for a minimum 10 years through *residential intensification* and, if necessary, lands which are *designated and available* for residential development; and
- b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned to facilitate *residential intensification* and *redevelopment*, and land in draft approved and registered plans.

It is anticipated that full build out of Empire's St. George community will be phased. With the addition of up to 1,291 dwelling units to the County of Brant's housing stock the proposed development contributes to the County's requirement to accommodate residential growth for a minimum of 10 years and development will also provide for a range of new residential unit types to meet current and future market demands.

Section 1.5 of the PPS provides the following policies regarding the provision of public spaces, recreation, parks, trails and open space.

1.5.1 Healthy, active communities should be promoted by:

- a) planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate *active transportation* and community connectivity;

- b) planning and providing for a full range and equitable distribution of publicly-accessible built and natural settings for *recreation*, including facilities, parklands, public spaces, open space areas, trails and linkages, and where practical, water-based resources;

The proposed subdivision includes a large green space network accessible to all residents supported by a number of linkages maximizing the benefits provided by topographic, environmental and archaeological features as well as existing woodlots. Furthermore, the street and greenspace network provides new and existing residents of St. George with opportunities for passive and active recreation.

Section 1.6.6 provides the following policies on Sewage, Water and Stormwater:

1.6.6.1 Planning for sewage and water services shall:

- a) direct and accommodate expected growth or development in a manner that promotes the efficient use and optimization of existing:
 - 1. *municipal sewage services* and *municipal water services*; and
- b) ensure that these systems are provided in a manner that:
 - 1. can be sustained by the water resources upon which such services rely;
 - 2. is feasible, financially viable and complies with all regulatory requirements; and
 - 3. protects human health and the natural environment
- d) integrate servicing and land use considerations at all stages of the planning process

1.6.6.2 *Municipal sewage services* and *municipal water services* are the preferred form of servicing for settlement areas. Intensification and redevelopment within settlement areas on existing *municipal sewage services* and *municipal water services* should be promoted, wherever feasible.

The proposed subdivision will make use of anticipated upgrades to existing municipal infrastructure. The St. George Area Study confirmed that the current water and waste water servicing infrastructure can be upgraded to provide necessary services to existing and new development within St. George and at the time of this report, two Municipal Class Environmental Assessments (EA;s) are underway; completion of which is expected this summer (summer 2017). At this point, the MOECC has issued comments and the County expects to schedule PIC #3 and 4 late summer or fall. Section 6.0 of this Report, provides greater detail on water and wastewater servicing.

1.8 Energy Conservation, Air Quality and Climate Change:

1.8.1 Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and climate change adaptation through land use and development patterns which:

- a) promote compact form and a structure of nodes and corridors;
- b) promote use of *active transportation* and transit in and between residential, employment (including commercial and industrial) and institutional uses and other areas;
- g) maximize vegetation within settlement areas, where feasible.

Empire’s St. George development, as proposed, includes a compact urban structure and extensive greenspace network that promotes active transportation, by providing the opportunity for development of a large walking/cycling trail network and streets that are designed in a grid format to make pedestrian and vehicular routes through the site more efficient.

In conclusion, the proposed zoning will regulate the compact built form of development (including reduced front yards) and will lend itself to creating a more efficient use of land, resources and existing and proposed infrastructure.

2. WISE USE AND MANAGEMENT OF RESOURCES

2.1 Natural Heritage

2.1.1 Natural Features and areas shall be protected for the long term;

2.1.2 The diversity and connectivity of natural features in an area, and the long-term *ecological function* and biodiversity of *natural heritage systems* should be maintained, restored or, where possible, improved, recognizing linkages between and among *natural heritage features and areas, surface water features* and *ground water features*;

2.6 Cultural Heritage and Archaeology

2.6.5 Planning authorities shall consider the interests of Aboriginal communities in conserving cultural heritage and archaeological resources.

Empire’s proposed St. George subdivision respects the natural heritage system and archaeological resources through a design that maintains minimum setbacks to both (where possible). The subdivision design will encourage community use of open spaces and green systems while discouraging (through design) active use of lands identified as significant archaeological resources (if requested by the Ministry and/or County of Brant). Specifically, it is the intent of the proposed Zoning By-law Amendment to provide detailed zoning that protects archaeological resources identified on site. Open Space blocks intended to protect significant archaeological sites include the site as well as a minimum buffer as identified by a professional archaeologist (and any minimum setbacks as outlined in the *Ontario Heritage Act*).

In summary, the subject applications are supportive of, consistent with and advance the policy initiatives of the Provincial Policy Statement.

4.2 Places to Grow: Growth Plan for the Greater Golden Horseshoe (2017)

The Growth Plan for the Greater Golden Horseshoe , 2017 was prepared and approved under the Places to Grow Act, 2005 and took effect on July 1, 2017. It is a plan for managing growth and development in the Greater Golden Horseshoe (GGH) to the year 2041 and directs the efficient use and management of land and resources.

Policies identified in section 2.2.2 Managing Growth outline how the Province imagines growth throughout the GGH; these policies are supported by the design of Empire’s proposed St. George subdivision:

Policy 2.2.1 Managing Growth:

2. Forecasted growth to the horizon of this Plan will be allocated based on the following: –

a) the vast majority of growth will be directed to settlement areas that:

- i. have a delineated built boundary;
- ii. have existing or planned municipal water and wastewater systems; and
- iii. can support the achievement of *complete communities*;

Empire’s St. George subdivision intensifies an existing settlement area by directing growth through the creation of a compact community to lands directly adjacent to the built-up area and will have access to proposed municipal water and wastewater systems. Furthermore, the proposed development provides a range of housing through the provision of a variety of detached homes and street townhomes on varying lot sizes and mixed use blocks. Intensification and compact form as contemplated by this development will support the County’s intensification targets as required by the Growth Plan and as outlined in the Official Plan. The Province has approved new density targets (80 residents and jobs combined per hectare) in the Growth Plan (2017); however they will not apply to St. George until after the next Official Plan update. Until that time density targets outlined through the County of Brant Official Plan will continue to apply to these lands (see Section 5.1 below). Nonetheless, higher densities as proposed by this subdivision will support this provincial initiative.

In conclusion, the proposed development provides a range of housing types, mixed use blocks and various open spaces and parks to support the creation of a vibrant and attractive compact and complete community that further enhances the St. George community.

5.0 LOCAL POLICIES

5.1 County of Brant Official Plan (2012)

The County of Brant Official Plan (OP) came into effect on September 4, 2012 and is meant to manage growth throughout the County until 2031. Further to the Official Plan, growth must be planned in an efficient, balanced and sustainable way that creates complete communities. Prior to approvals for development on large tracts of land, Section 2.2.4 of the Official Plan states that such large scale growth “shall be preceded by and managed through the preparation of Area Studies”.

As a result, and following the initial planning applications made in 2008, Empire Communities joined and managed the St. George Land Owners Group (LOG) and together, the LOG completed the St. George Area Study. It was approved by Council on May 27, 2014. The process and outcome of the St. George Area Study is discussed further in Section 5.2 below.

The County of Brant Official Plan identifies the community of St. George as a Primary Urban Settlement Area (2.2.3 Community Structure) which is a designation given to lands that generally

have full County water and sanitary sewage systems and are intended to accommodate the majority of growth and development in the County. Policies also direct new development to occur in a manner that creates complete communities. Specifically, the subject lands are designated as “Urban Residential” and “Natural Heritage System” within Schedule A-2 (Land Use Map) of the County OP.

The development of Empire’s proposed St. George subdivision is supported by the following County of Brant Official Plan policies:

Section 2.2.2.3 “Designated Greenfield area Density Targets” states:

“The designated Greenfield area of the County will be planned to achieve a minimum density target of not less than 30 residents and jobs combined per hectare, increasing to 35 residents and jobs combined per hectare by 2012, and 40 residents and jobs per hectare by 2022”.

The Official Plan also confirms that the density target will be measured over the entire designated Greenfield area of the County (excluding certain natural features as outlined further in Section 2.2.2.3). Density achieved in the proposed St. George Settlement Area meets and exceeds the County’s minimum density target of 40 people and jobs per hectare by 2022 and thus will help to support the County-wide Greenfield density target. The maximum density of the proposed subdivision is outlined in Table 3 below:

Table 3: Empire’s St. George Subdivision (proposed), Proposed Land Use, Area and Density¹

Land Use	Blocks	Area (ha) ²	People/Jobs ³
Residential ⁴	1-75	26.93	2,691
Work From Home ⁵	N/A		
Stormwater Management	79-80	3.41	
Streets/Roads	N/A	16.95	
Park and Open Space ⁶	81-84, 88-90, 92	9.61	
Mixed Use ⁷	76-78	3.60	464
TOTAL		60.50	3,155
		TOTAL DENSITY	52 ppl per net ha

1 Density is calculated based on Growth Plan Policy 2.2.7.2 and 2.2.7.3

2 Area is calculated based on Growth Plan Policy 2.2.7.3

3 People/Jobs as per Watson & Associates Growth Analysis Study prepared on behalf of the County:

Low Density Units: 2.89ppu; Med-Density Units: 1.94ppu and High Density Units: 1.29 ppu; #jobs is not represented in this information due to a lack of statistics available for St. George; it also represents a maximum density based on maximum proposed unit counts (1,291units).

4 Residential Land Use consists of a variety of housing forms, 8.0m ,10.0m and 12.0m detached units, 6.0m townhouse units and units in mixed use blocks.

5 Watson & Associate (2008) study suggests 14% of the workforce in Brant County works from Home but does not identify the St. George work force.

6 As per the Growth Plan’s method of calculating net density, total Park and Open Space area excludes Natural Heritage System lands within Official Plan’s Schedule A-2 and Valley Lands and Wetlands identified on Schedule C-2 of the County of Brant Official Plan. (Block 91 and Gas Line Blocks: 85-87 are excluded from the density calculation)

7 # jobs created through the mixed use block is not included.

In addition, Section 2.3 of the Official Plan, “Natural Heritage, Potential Resource and Hazard Management Policies” states that:

2.3.1 The County shall ensure, in partnership with the Federal and Provincial governments, applicable Conservation Authorities, and other cross-jurisdictional authorities, that natural resources and natural heritage features and areas are protected from development ...”

Schedule A-2 (Land Use Map) and Schedule C-2 (Natural Heritage System Features and Development Constraints Map) identify various natural heritage features throughout the St. George settlement area. Woodlot, hedgerow, valleyland and wetland features as identified on these schedules within the proposed subdivision lands have been protected through the creation of a greenspace network that includes parkland, stormwater management and open space blocks. The greenspace network (Figure 4) created will provide opportunities for residents to enjoy the natural features of the area while protecting their integrity and ecological functions.

In addition, Policies outlined in Section 2.4, Housing Policies “establish policies for the provision of housing to accommodate the existing and future residents of the County”. Furthermore, the Official Plan encourages and allows for a range and mix of housing types, tenures, and densities. Empire’s proposed St. George subdivision provides a variety of sizes and forms of housing including detached homes of various sizes, townhomes and an opportunity for low rise apartments or townhouse products in three mixed use blocks.

Section 2.7.4.2 Parkland Dedication sets out parkland requirements through the provision of parkland or cash-in-lieu payments to support the creation of complete communities. Requirements are 5% of gross land or one hectare for each 300 units approved. Based on this requirement, the proposed subdivision is required to provide approximately 4.30ha (9.88 acres) of parkland. As designed, Empire’s St. George subdivision includes approximately 19.19ha (47.42 acres) of integrated greenspace that extends from the northwest to the southeast. It is made of a total of

- 2.0ha (4.94 acres) of parkland for active play,
- 5.1 ha (12.60 acres) of open space for passive play,
- 2.12 ha (5.23 acres) of protected woodlot,
- 6.56ha (16.21 acres) of other open space (archaeological sites), and
- 3.41ha (8.43 acres) of land dedicated for stormwater management ponds that will be naturalized and may include walking trails.

The proposed development exceeds the County of Brant’s parkland requirements as outlined in the Official Plan.

Lastly, Section 2.7.6.2 Archaeological Sites states:

“The County recognizes that there are a significant number of archaeological remnants of pre-contact habitation within the County of Brant and important archaeological evidence of historic activities, which would be of value in future conservation of the County’s heritage.

- b) The County shall identify any development applications that shall affect areas containing registered archaeological sites or lands of archaeological potential. Development on land containing significant archaeological resources or in areas of archaeological potential shall avoid the destruction or alteration of these resources;
- c) Where avoidance is not possible, the development proponent shall conserve significant archaeological sites through the removal and documentation in advance of any land disturbances, and in accordance with archaeological licensing provisions of the *Ontario Heritage Act*.

In support of this application Stage 1, 2 and 3 Archaeological studies were completed and identified 8 sites of archaeological significance requiring Stage 4 review. Further to these results Empire Communities reviewed and revised the proposed Draft Plan of Subdivision with the intent to preserve, where possible, significant archaeological sites. As a result, 5 archaeologically significant sites are proposed to be preserved. The proposed Zoning By-law Amendment, as discussed further in Section 7.3 (below), includes protective open space zoning conditions that ensure the safeguarding of significant archaeological sites from future disturbance. As a result of road infrastructure and deep servicing required, not all archaeological sites can be preserved. The current proposal includes the excavation of 3 archaeologically significant sites. Excavation will be done by Archaeological professionals following the provisions of the *Ontario Heritage Act*.

In conclusion, Empire's St. George subdivision, as proposed, is supported by various policies of the County of Brant Official Plan (as outlined above). The lands are currently identified as "Urban Residential" and "Natural Heritage Systems". However, in order to allow additional flexibility of housing form and density within the urban residential designation and to reflect changes proposed through the St. George Area Study, an Official Plan Amendment is required. It will add a "Mixed Use" land designation within Schedule A-2 of the County of Brant Land Use Plan (Figure 7) as previously approved by Council through their review and approval of the St. George Area Study. The proposed Land Use Map is attached as part of Appendix B.

5.2 St. George Area Study

The St. George Area Study was coordinated by the St. George Land Owners Group (LOG) made of Empire Communities, Activa Group and Riverview Highland Homes and required the completion of in depth studies related to land use planning, financial impact, housing, traffic, water supply and distribution, stormwater management, wastewater and wastewater conveyance. The St. George LOG made final submissions to the County of Brant in February 2014 and the Area Study was approved by Council on May 27, 2014. It is our understanding that County staff is now prepared to circulate planning applications for the subject lands in order to facilitate their review in support of final approval.

The Area Study establishes a land use and infrastructure framework that is meant to direct and support future development where appropriate in the community of St. George. Furthermore, the Area Study is also meant to ensure that development occurs within areas and timeframes that can

be supported by municipal infrastructure and that development is appropriate to the projected growth.

The Area Study determined that St. George is well suited for new development following upgrades to the water and wastewater infrastructure. Specifically, the Area Study estimates that following these upgrades St. George may accommodate up to an additional +/-9,000 people. Our goal is to have the County review and approve the Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications contemplated herein and submitted in support of Empire's proposed St. George subdivision prior to completion of upgrades to the water and wastewater servicing systems. This will allow on site servicing and earthworks to begin such that the site can be ready for construction once the plants are commissioned. In support the County may include conditions in the subdivision agreement that require that servicing be in place before building permits are issued. Alternately, the proposed re-zoning can include the provision that a Holding (H) Symbol be placed on all subdivision lands; not to be removed until servicing is available. Both options can ensure that construction of new homes (although approved) does not occur until servicing is available.

6.0 SERVICING AVAILABILITY

The St. George Area Study identified upgrades to the existing water supply and distribution system and the wastewater conveyance and treatment system that are required to support additional growth within the settlement area. The Area Study also identified that there are "significant deficiencies in wastewater treatment that relate to low capacity of the existing wastewater treatment plant". The existing Water Pollution Control Plant (WPCP) in St. George requires immediate improvements that will benefit existing and new residents.

The County of Brant also recognizes that there is a potential threat to the existing St. George water supply as all three wells are within close proximity to one another; if one well is compromised, all three could be compromised. The addition of a new water supply outside of the existing well field will increase the safety of the current St. George water supply and benefit existing and new residents.

On March 5, 2014, in support of much needed upgrades to the water and wastewater systems in St. George, the County of Brant awarded RFP 3-13 "Consultant Services for St. George Water and Wastewater Servicing Municipal Class Environmental Assessment" to Cima Canada Inc to facilitate completion of two Municipal Class Environmental Assessments (Class EA). Both EA's are near completion with PIC #3 and 4 planned for the fall of 2017. Following their completion we anticipate that a preferred approach to expand and upgrade the water and wastewater servicing in St. George will be completed and hope that the County will conditionally approve new development. It is anticipated that design and construction of the necessary system upgrades will be complete in early 2019. Water and wastewater system upgrades may be financed through development charges and/or front end agreements with area developers.

7.0 ZONING BY-LAW

7.1 Zoning By-law No. 61-16

The County of Brant adopted Zoning By-law 61-16 on May 24, 2016 as part of a comprehensive zoning review. This by-law was approved by the Ontario Municipal Board on January 25, 2017 and at this time the Comprehensive Zoning By-law 61-16 specifically excludes Empire Communities' proposed subdivision lands in St. George; final zoning of these lands will be reviewed and heard separately by the Ontario Municipal Board as part of the overall appeal made by Empire (OMB File No. PL160641).

The County's Zoning By-law currently identifies the lands as "Agricultural" (A, A-92 and A-99) and "Natural Heritage" (NH). Amendments to existing zoning would reflect the change in use of land from "Agricultural" to "Residential" and "Mixed Use" (with special provisions) and implement policy objectives of the Province and the County. Specifically, meeting policies related to land use, growth and density, housing and development.

7.2 Proposed Zoning

The proposed Zoning By-law Amendment would rezone the subject site to allow for a mix of housing including detached dwellings, townhouse dwellings and various attached dwelling forms permitted in three mixed use blocks to reflect land use designations outlined in the Official Plan. We are requesting that the subject site be re-zoned as shown in Figure 9 to:

- (1) Zone R1- Special Provision, 8.0m detached dwelling (residential low density with design guidelines);
- (2) Zone R1 – Special Provisions, 10.0m detached dwelling (residential low density with design guidelines);
- (3) Zone R1 – Special Provisions, 12.0m detached dwelling (residential low density with design guidelines);
- (4) Zone RM1 – Special Provisions, 6.0m street-fronting rowhouse dwellings (residential low density with design guidelines);
- (5) Zone C5 – Special Provisions, mixed use (mixed use residential and commercial, high density with design guidelines);
- (6) Zone OS2 – Special Provisions (Utility, SWM and Open Space);
- (7) Zone OS2 – Special Provisions (Recreation)
- (8) Zone NH (Natural Heritage).

The proposed zoning has been revised since the initial submission in 2008 and second submission in 2015 and would allow for the development of a mix of housing types and lot sizes and will provide open space and enhance the greenspace network in support of the St. George community.

In summary, Empire's St. George subdivision has been designed to reflect development and growth policies as well as to meet strict density requirements set out by the Province of Ontario and County of Brant. In order to achieve these requirements the enclosed Zoning By-law Amendment (Appendix

C) requests specific modified performance standards that provide relief from current zoning standards outlined in the County of Brant Zoning By-law (61-16).

8.0 CONCLUSION

In conclusion, the subject applications are consistent with, and have regard for, provincial planning policies and objectives as well as those of the County of Brant. These policies indicate that St. George, as an Urban Settlement Area, is designated to accommodate the majority of growth in the County. Empire's St. George subdivision provides a logical extension to the existing community of St. George through the extension of Andrew Street, the addition and integration of a large greenspace network and will use municipal infrastructure upgrades that have been proposed through the Area Study and that are currently underway.

In summary, the proposed Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications represent good land use planning and are consistent with the PPS, conform to the Growth Plan and we recommend their approval in support of the development of Empire's St. George subdivision.