



MEMO

TO: Rob Trotter & Ruchika Angrish, County of Brant
FROM: Bobby Gauthier, WSP
SUBJECT: St. George OPA – Response to Public/Landowner Comments
DATE: Original Feb. 13, 2018 (See Items #1 - #9)
Revised March 27, 2018 (See Items #10 - #15)

The purpose of this memo is to provide a response to public and landowner comments received regarding the St. George Area Study Addendum and attached Draft Official Plan Amendment (dated Nov. 1, 2017, and presented at the Public Information Meeting on Nov. 7, 2017). Further, this memo has been revised to respond to comments received up to and including March 27, 2018. This memo has been prepared by WSP in consultation with the County of Brant.

1. Comments from Council at the Public Information Meeting

Members of Council provided some comments at the Public Information Meeting held on Nov. 7, 2017. We note several members of Council expressed general support for the documents and the principles behind them. The overall intent of the St. George OPA is to ensure the County's interests, and the interests of the residents and businesses of St. George, are being maintained in the face of significant development pressure. A concern was expressed regarding the notion of removing a portion of St. George from the primary urban settlement area, and placing it in the secondary urban settlement area. In our opinion the recommendation was put forward and approved as part of the 2014 Area Study and previously presented as part of the initial draft OPA brought forward at a Public Information Meeting in 2016, and the OPA represents an appropriate approach to managing limited services in St. George and ensuring that development will represent a logical expansion of St. George.

2. Public Comments at the Public Information Meeting

Members of the public were invited to speak at the Public Information Meeting and we note the following:

- A resident requested a hard copy of the materials and we understand the County produced these materials shortly after the meeting.



- A resident expressed general support for the initiative and asked about the ability to encourage innovative forms of servicing/septic technologies and low impact development (LID) principles within the employment area. While we generally support the principle behind the comment, we note that the Official Plan currently provides policies that encourage and support water conservation and similar initiatives (e.g., the policies of 2.7.7). We note the Official Plan does not currently make specific reference to implementation of LID principles. This could be considered as part of a future Official Plan Review.
- An agent/representative of a landowner representing the Oaks of St. George provided some comments and we understand the County has undertaken further correspondence with this landowner.

3. GRCA Comments

In a letter dated November 21, 2017, the Grand River Conservation Authority (GRCA) provided comments on the St. George Area Study addendum report and OPA. We note the following:

- We agree with the editorial comments made regarding the St. George Area Study Addendum Report and these revisions have been made in the latest version of the Addendum Report (dated Nov. 12, 2018).
- We are able to address the comment to Section 2.8.7 of the OPA in which we can make reference to the need for appropriate studies being required in association with a potential future road connection south to German School Road.
- We generally agree with GRCA's comment that the roadway connecting south to German School Road could be shown as conceptual, since it will be subject to environmental studies and further GRCA review to confirm its feasibility.
- We note that GRCA requested data to review the natural heritage system, and the mapping has been revised by the County to address updates to wetland areas.

4. Mixed Use Area

County staff requested that WSP consider identifying any other policies to guide a suitable built form and configuration for the mixed use blocks. The Draft St. George Official Plan Amendment provided a site-specific policy area for this mixed use block, which is located on the north side of Highway #5.

Generally, the policies of the Official Plan (under the Mixed Use land use designation – section 3.11) provide a basis and starting point to appropriately manage development in some respects, but further policy guidance may be included in the Official Plan Amendment to recognize the context of this site in St. George and to plan for appropriate commercial or mixed use development that is in line with the character of the community. We do not have a strong basis or design study upon which to base detailed policy recommendations, as the site was not examined from an urban design perspective as part of the original 2014 St. George Area Study. Based on good design and planning principles and to ensure the appropriate continued development of St. George, we recommend the following:

- With respect to permitted uses, there should be a preference for mixed-use buildings provided on the mixed use site. However, the provision of stand-alone commercial uses may also be appropriate, depending on market conditions and recognizing the low-rise character of the community. Thus, we would suggest that the policies indicate a preference for mixed use buildings but stand-alone commercial uses may be appropriate. Otherwise, land use should generally be in accordance with the policies for the Mixed Use land use designation.
- Stand-alone residential uses could be contemplated in the rear of the lots (e.g., townhomes, stacked townhouses, or low-rise apartments). Generally, there should be a preference to not have ground-related residential uses fronting on Beverly St. W.
- We do not have a basis to suggest specific limitations of commercial uses (i.e., GFA) and would leave that as a consideration for the market study prepared in support of the development, which is a requirement of the site-specific policies to ensure that the new commercial uses will not negatively impact Downtown St. George and other businesses.
- There should be transition from the front yard, inclusive of step backs, or the placement of 2-3 storey buildings in the front, with any taller buildings, as may be proposed and permitted, in the rear portion of the lot.
- We note the Official Plan's policies for Mixed Use designation are appropriate with respect to managing drive-throughs and other commercial uses permitted in this designation. Similarly, the policies of this designation regarding compatibility with adjacent uses and areas are appropriate. The design will also be guided by the requirement to prepare Community Design Guidelines as contained in the Official Plan Amendment.

5. Second Units

Servicing capacity limitations in St. George will create challenges with respect to the permission of second units (e.g., basement apartments) in St. George. Currently, the zoning by-law permits second units in St. George, subject to confirmation of servicing availability. There is a general intent by the Province to permit second units as a source of affordable housing. We note that in some municipalities (or portions of municipalities), servicing constraints have provided a basis for limiting second units to some degree, as a recommendation of a comprehensive second suite study. For example, the City of Kingston limits second suites in some areas of the City.

Generally, the provision of some second units within the built-up area of St. George should continue to be contemplated. Servicing allocation for these units could comprise a portion of allocation that is reserved for infill and intensification (as discussed later in this memo). It is not expected this will represent a major draw on future servicing availability. The Zoning By-law appropriately requires that servicing be confirmed prior to issuance of a building permit.

We recognize there may also be a circumstance where a builder of a new subdivision proposes second suite(s) just prior to requesting a building permit for a new dwelling, after servicing allocation is formally confirmed for the proposed subdivision. We recognize this could create a risk of servicing allocation becoming over-committed. We suggest that any such intention to develop second suites should be identified as a condition of draft plan approval, so that the County can appropriately anticipate any proposed second suites and their impact on servicing allocation. Where a second suite is proposed after servicing allocation is formally provided, the proposed dwelling would still be subject to the Zoning and building permit process. In accordance with the Zoning By-law, the building permit cannot be issued until servicing is made available. If a proposed second suite does not have formal servicing allocation, there would be a basis for the County to withhold the building permit. Further, the County may apply the Holding zone to future greenfield areas.

6. Servicing Allocation Policy/Guidance

The County has requested that WSP consider further policy guidance regarding servicing allocation as part of the St. George Official Plan Amendment. We note that Section 5.2.2 of the Official Plan contains policies for allocation of servicing and phasing, summarized as follows:

- It is intended that development will not be granted approval until adequate uncommitted reserve capacity is available, or unless the

County has executed construction contracts for the expansion of servicing capacity.

- If servicing is not available, the County may consider the application premature and defer final approval until capacity is available or until an agreement is in place to ensure capacity will be available within three years of the planning approval. Where servicing is not available lands will be placed in a holding (“H”) zone.
- Draft approval will only proceed to registration if capacity continues to exist or if there is a servicing agreement.
- Allocation for draft approved plans is limited to five years to allow reserve capacity to be efficiently used.
- The County may reassign servicing allocation or hold capacity if conditions of draft plan approval are not fulfilled in a reasonable time period.

We have conducted a review of examples of servicing allocation policies and approaches. Generally, municipal Official Plans address servicing allocation at a high level, and leave it to the servicing allocation policy (adopted by Council as a non-statutory by-law/document) to address the details and criteria. Formal allocation of servicing is typically provided by a resolution of Council, at Council’s discretion, in accordance with the policy. In some cases this responsibility is delegated to staff. In any case, no development can proceed until allocation is provided (or development is exempted from the allocation).

Typically, the Official Plan policies provide direction of when servicing is to be confirmed at key stages of the development approvals process. There is a need to ensure that servicing will be made available in order to provide draft plan approval (through confirmation of uncommitted available servicing or an agreement to ensure servicing will become available such as a front ending agreement). Further, prior to final approval (registration), formal allocation must be obtained. This is addressed as a condition of draft plan approval.

The municipalities vary considerably in the content and detail of servicing allocation policies/by-laws (i.e., non-Official Plan documents). It is common for the policy to ensure that any allocation that is granted is not indefinite, but there are mechanisms for Council to re-allocate capacity in the event that development does not proceed expediently. Some policies also include a range of criteria and a scoring system to assist in evaluating proposals that are competing for limited capacity. We note that several municipalities have servicing allocation policies that give some provision to reserving an amount of capacity for infill/intensification (e.g., Haldimand and Niagara-on-the Lake provide for 5% to be allocated accordingly). This approach has relevance to the St. George context,



since the 2014 Area Study contemplated and provided for a small amount of infill development, and there could also be other or newer infill/redevelopment opportunities in St. George that were not identified in the 2014 Area Study.

The allocation of servicing in St. George, where there is very limited capacity, will be critical to managing servicing capacity and commitments over time.

We recommend including a servicing allocation policy that is high level and can direct preparation of a separate allocation by-law/policy to be approved by Council. The Official Plan can set out the basis or guidelines for the allocation policy. We recommend further clarifying that draft plan approval shall not constitute a formal allocation of servicing and that formal allocation would occur prior to registration, in accordance with the servicing allocation policy/by-law. The allocation of servicing capacity will be a condition of draft plan approval. Further, there is an opportunity to ensure that development applications identify that servicing are or will be made available to service the proposed the development, at the time of making an application. This must be addressed in the context of a 'complete application' under the *Planning Act*. If the developer cannot demonstrate that servicing is or will be made available, the County could consider the application to be incomplete. Currently, the policies of the Official Plan contains complete application requirements under Section 6.13, which are relevant but could be built upon with the requirement that confirmation of current or future servicing availability should be addressed as part of a complete application submission.

The County's current allocation policies under Section 5.2.2 are also applicable. These policies give the County the ability to not grant planning approval until uncommitted capacity is available or until the construction contracts for the expansion of capacity are executed. Further, the policies ensure that final approval is not granted until capacity is available.

A key item to be addressed is determination of how servicing allocation will be provided to infill development proposals. The Area Study provided some assumptions about the number of infill units that could be expected and should be planned for as part of the planned servicing capacity. It is not reasonable to expect that minor infill proposals and proponents will participate in cost sharing agreement, but rather, their contribution to required works will be recovered through development charges. The allocation policy/by-law should identify that the County should reserve a certain percentage of capacity to be made available to infill proposals. We do not recommend indicating this in the Official Plan directly to provide more flexibility to the County. Based on other municipal examples, a reserve capacity in the order of 5% - 10% is suggested to provide for infill



and intensification. A specific appropriate reserve capacity may be identified by the County once the Class EA is complete and the Servicing Allocation Policy is prepared.

For future reference, following is a list of examples of servicing allocation policies that were reviewed:

Example of Servicing Allocation Policy	Link to Document
Norfolk Official Plan	http://www.norfolkcounty.ca/download/Draft-OPA-tract-changes-Verson-public-meeting-2a-Dec-20.pdf
Haldimand County Servicing Allocation Report	http://www.haldimandcounty.on.ca/uploadedFiles/Our_County/Planning/Planning_Applications/PED-PD-49-2015%20Servicing%20Allocation%202015%20Year%20End%20Update.pdf
Central Elgin Official Plan	https://centralelgin.civicweb.net/document/67041
Uxbridge Sewage Allocation Policy	http://town.uxbridge.on.ca/sites/default/files/documents/Sewage%20Allocation%20Policy%20-%202012.pdf
Niagara-on-the Lake Allocation of Wastewater Servicing Interim Policy	https://notl.civicweb.net/document/3666
Town of Georgina – Sutton/Jackson’s Point Servicing Allocation Assignment Program for Residential Development	https://www.georgina.ca/sites/default/files/page_assets/planning_sjpsappendixiii.pdf?token=jQ0Q_2J9
Town of Innisfil – Alcona Secondary Plan	https://innisfil.ca/getFileByName/Alcona%20North%20Secondary%20Plan%20Nov%2017%202011.pdf

7. Propane Facilities

A firm representing Parkland Fuel Corporation and Sparlings Propane Co. Ltd. submitted comments regarding facilities located at 150 and 183 Industrial Boulevard. A suggested change to Section 2.8.9 has been proposed as part of the comments. We note the following context:

- The *Planning Act* only requires that municipalities circulate applications to propane operators where the facility’s defined hazard distance extends into the application’s subject lands. This applies to OPAs (O. Reg. 543-06), plans of subdivision (O. Reg. 344/06),

consents (O. Reg. 197/96), zoning and other by-laws (O. Reg. 545/06) and minor variances (O. Reg. 200/96).

- Our interpretation is that the onus appears to be on propane operators to manage risks where development is being proposed. We have not been able to locate any such examples of Official Plan policies in which the municipality has committed to responsibility beyond circulation based upon currently known hazard distances. We understand that hazard distances are determined by propane operators and submitted to the TSSA, which are then circulated to municipalities. Our understanding, according to MMAH's correspondence to municipalities, is that the propane operators have the onus of introducing mitigation measures in response to development applications (see as an example: <http://www.peelregion.ca/council/agendas/pdf/gc-20100114/communication-ma-c6.pdf>)
- Accordingly, based on this review, we do not suggest further changes to the policy, since the policies as written achieve the County's responsibility for circulating development applications to propane facility operators.

8. Comments from MHBC

MHBC submitted comments on behalf of Losani Homes. Generally, MHBC supports the direction of the County, including delineation of the primary/secondary urban settlement areas in St. George. We note the following specific comments:

- The initial draft Official Plan Amendment identified a requirement that landowners become party to a cost sharing agreement. MHBC indicated concerns that their ability to become party to such an agreement will be held up by other interests, along with several other inquiries for clarification. Since completing the Draft OPA, we now understand that the major capital costs for wastewater and water capacity upgrades will be addressed part of the Development Charges By-law. Accordingly, while landowners may still enter into cost sharing agreements to address other infrastructure and works, the need for the policy is diminished. We recommend removing the policy. However, there will be a greater emphasis on the need for a servicing allocation policy to manage how allocation will be divided amongst developers.
- MHBC wishes to clarify how much development is contemplated by the policy that enables limited small scale infill and whether limited small-scale should be clarified. They request whether this relates to the built boundary and note that a portion of land is in the built boundary and whether the client's lands could constitute a portion of

this allocation. Further, they request clarity regarding what would constitute limited small-scale development. Additionally, MHBC requests clarification regarding the application of 2.8.3 (d), which ensures a limited amount of servicing capacity be allocated to support development of higher density and infill units, including clarification about what constitutes higher density units and how much capacity will be allocated. As noted, we recommend that the allocation policy identify a specific percentage of capacity that should be reserved for infill/intensification. We have made revisions to the policies to clarify the intent. Essentially, it is intended that a reserve capacity will be identified by a subsequent servicing allocation policy and for higher density units. We do not recommend identifying the specific reserve capacity in the OPA itself, as it should be managed fluidly and flexibly as part of the separate servicing allocation policy. With regard to high density units, the intent is that the servicing allocation policy could consider prioritizing a proportion of capacity to ensure that the greenfield areas are developed with an appropriate mix of units and help support the unit mix as outlined in the Official Plan Amendment.

- MHBC generally supports the phasing plan but requests clarity to the policies. We confirm that the policies of section 2.8.4 (a)(v) are intended to refer to the phases in the phasing map for the broader community. MHBC is concerned about how this will impact progression of their client's subdivision if other developments are slower and prevent progress. The phasing plan represents a progression that appears to be well-aligned with landowner interests that have been expressed. There would be a risk that development can be held up to a degree, but the policy is intended to be broadly written (majority of units must be constructed prior to building permits being issued in a subsequent phase) to give flexibility. The policies are not intended to require complete build-out of preceding phases.
- MHBC requests clarity about how servicing capacity is committed to development, under Section 2.8.4 (g). They understand that capacity is committed as part of draft plan approval. However, if capacity is committed by another mechanism, there is uncertainty about when each phase can be registered. Generally, it is intended that servicing would indeed be committed as part of draft plan approval, but it is intended that the formal allocation will not occur until just prior to registration to ensure that development occurs in a timely manner and that capacity is not being unreasonably tied up for a long period of time.
- MHBC has indicated that while Schedule C-2 was modified, the OP permits refinements of boundaries of natural features shown on Schedule C-2 and thus will continue to rely on their Environmental Impact Study as being able to determine the boundaries of features



notwithstanding updates made to Schedule C-2. We agree with MHBC's interpretation.

9. Comments from Armstrong

Comments from Armstrong Planning were received, and we provide the following response:

- Armstrong notes some considerations regarding persons per unit (PPU) assumptions made in the Nov. 2017 Area Study Addendum Report". We note the Addendum Report which references PPU assumptions as made via the Area Study and the County's latest assumptions. Any reference to these numbers is contextual in nature.
- Armstrong requests more clarity about when development can proceed and clearly allow flexibility to allow certain works to proceed when infrastructure upgrades are underway. The intent of the OPA is to enable flexibility to allow infrastructure to proceed as necessary, and this is noted explicitly in the policies.
- Regarding Section 2.8.2 e) of the Draft Official Plan Amendment, Armstrong requests considering a modification of "services are confirmed" to "services are available" and requests clarity regarding what "proceeds" means (e.g., draft plan approval or registration). Armstrong notes that draft plan approval can be granted with conditions that building permits and/or registration cannot proceed until servicing is available. In other words, servicing of lands can proceed while construction of the wastewater treatment plant is underway but building permits cannot be issued until the plant is operational. Further, they request consideration for how this policy relates to 2.8.3 a) and consistency in the use of the term "is available." We agree with the comments and have provided clarifications to the policies.
- Regarding 2.8.4 a) iv), Armstrong requests clarification of "timely manner" with respect to the provision of community services such as schools, trails and parks. Generally, the intent of the policy is to ensure that construction of these facilities will occur once they are needed to serve the majority of new residents. Specific details of implementation should be set out in conditions of development approval as it would be difficult at this stage to provide more specific timelines.
- Regarding 2.8.7 e), Armstrong notes a modification is required to refer to the trails network which is shown on Appendix 3 and not Schedule B-1. We have made this change.
- Armstrong notes a minor edit to a section reference in policy amendment no. 14 and this change will be addressed.

10. Comments from Davies Howe/Bousfields (on behalf of Stremma Developments Inc., the owner of The Oaks of St. George Golf Club)

Davies Howe has provided written and oral submissions in relation to the statutory public meeting that was held on March 6, 2018. This included a letter submitted on March 6, 2018, delegation to the Planning Advisory Committee at the Statutory Public Meeting on March 6, 2018, and a letter and associated report submitted to Council on March 27, 2018. The submissions included reports authored by Beacon Environmental, MTE Consultants Inc, and Bousfields Inc.

The Oaks of St. George lands are currently designated by the Official Plan as Parks and Recreation, are located within the Primary Urban Settlement Area and are also located within the Built Boundary (Schedule A-2 of the County of Brant Official Plan). The effect of the proposed Area Study Official Plan Amendment is to modify these lands to a Secondary Urban Settlement Area.

The comments below are in response to the key matters raised in the correspondence.

Request to permit residential uses in the Oaks of St. George lands:

Davies Howe has submitted that the land use designation of the Oaks of St. George lands should be modified to permit residential uses on the lands, through a site specific policy or a residential designation. The lands are currently designated Parks and Recreation. It is not the intent of the St. George Area Study Official Plan Amendment to add residential development permissions for these lands, given the nature and intent of the Official Plan Amendment. A request to designate these lands for residential uses could occur through a development application to assess the specific merits of the land use designation change in conformity with the policies of the Official Plan. Such a request would need to be supported by a planning rationale from the proponent. We note that the County appears to have a long term supply of land designated for residential uses. According to the Watson Growth Analysis Study prepared in 2008 as part of the Official Plan Review, there was estimated to be in the order of 60 years of designated residential land supply available. Though this residential land supply analysis will need to be reviewed and updated as part of a future Official Plan Review, the Watson report indicates that there may not be a clear rationale to designate additional urban residential land supply in the County at this time.

Rather, due to anticipated wastewater capacity servicing constraints, there has been a need to reduce the size of the Primary Urban Settlement Area, in order to better align the serviceable lands with the

anticipated servicing capacity. This was a specific recommendation made in the Area Study, as endorsed by Council in 2014. The approach of reducing the settlement area is to better align the developable area with the land that could potentially be serviced.

It is noted that the Official Plan provides for the potential to reconsider upgrading areas from Secondary Urban Settlement Areas to Primary Urban Settlement Areas, where the provision of full municipal services can be demonstrated (2.2.3.1.2(j)(i)), as well as other criteria.

Accommodating infill and intensification in St. George:

The submission identifies that the effect of the OPA is to compromise the County's ability to achieve intensification targets. Further, the submission suggests that the effect of the OPA is to direct the entirety of new growth in St. George to greenfield lands. The Official Plan sets out a minimum intensification target of 15% (2.2.5.2). The proposed OPA does not preclude intensification opportunities. The proposed OPA ensures that opportunities for intensification will continue to be facilitated, by reserving a minimum servicing allocation to be set aside for infill and intensification (Policy 2.8.3 c. vi. of the OPA). The specific servicing allocation will need to be set out as part of the servicing allocation policy in accordance with the policies of the Official Plan. The Area Study Addendum Report identifies an allocation in the order of 5-10% which the County can consider when developing the allocation policy.

It is recognized that the Oaks of St. George lands, along with other areas of St. George, are located in the Built Boundary and are proposed to be modified to a Secondary Urban Settlement Area. This approach does not preclude the ability for these lands to accommodate intensification. The lands will continue to be included within the St. George settlement area, and intensification is contemplated in accordance with the policies for Secondary Urban Settlement Areas.

While The Oaks of St. George lands are located in the Built Boundary, we note they are currently designated for Parks and Recreation uses, and residential uses are not currently permitted. Accordingly, the lands were not necessarily contemplated as a residential infill opportunity when the Official Plan was prepared, but have been planned for Parks and Recreation uses. The OPA does not impact the County's ability to achieve its intensification target.

It is noted that the Built Up Area of St. George is not contiguous, and only a portion of the area is currently provided with full municipal services. The village of St. George, which is currently provided with full municipal services, will continue to be included the Primary Urban Settlement Area. This area includes the wastewater treatment facility. This area should be considered the priority for intensification amongst the Built Up Areas in

the St. George settlement area, since full services are currently available. Immediately contiguous greenfield areas will also continue to be contained within the Primary Urban Settlement Area, where services can be logically extended from the existing village. The Oaks of St. George and adjacent areas are not contiguous with the existing serviced Built Up area of the Village, and are not currently provided with full municipal services. The development of greenfield areas between these Built Up Areas will facilitate a logical extension of full municipal services towards the other Built Up Areas, including the employment areas, rural residential areas, and the Oaks of St. George lands. Intensification can still occur within the Secondary Urban Settlement Area, subject to the policies of the Official Plan.

Coordination with Infrastructure Improvements:

The proposed OPA and modification of the extent of the Primary Urban Serviced Area is premised on the limited assimilative capacity of Fairchild Creek, which will limit wastewater treatment capacity over the planning horizon. This approach is consistent with the ongoing Class Environmental Assessment (EA) processes for water and wastewater in St. George, which are nearing completion. Should the anticipated capacity become committed, the County will be able to initiate a subsequent Class EA to consider other alternatives (Section 2.8.4 c. of the OPA). At that time, there may be an opportunity to reconsider the extent of the Primary Urban Serviced Area through a future Official Plan Review or Official Plan Amendment. As noted, the Official Plan provides for the ability to modify Secondary Urban Settlement Areas to Primary Urban Settlement Areas, subject to criteria (2.2.3.1.2(j)).

The submission includes comments and a Technical Memorandum by MTE regarding the Class EA processes, and we trust the County will consider the comments as part of those Class EA processes. We understand the County completed a memo in response to the submission. It was noted by the County that the Class EA process has been ongoing since early 2014, and included three Public Information Centres through the process. Further, the concerns being raised were not directly submitted to the Class EA team. It was also noted that in order to proceed with Option 2 - the Grand River solution, there would need to be considerably more study, cost and delay to the process, and there is eagerness by some landowners to proceed with development.

Employment Lands:

The submission has also raised concerns that the effect of the OPA is to limit employment development opportunities in St. George. The OPA, rather, reflects the current servicing in the employment area (County water and private septic systems). This partial servicing is anticipated to continue to be provided in the planning horizon, in accordance with the



anticipated outcome of the ongoing Class EA processes which are nearing completion. We also understand the County is currently reviewing its employment land needs.

Area Study Process:

The submission has raised some concerns regarding the process that has been conducted. The initial Area Study process, which concluded with the Area Study report (2014) being adopted by Council, was conducted in accordance with the policies of the Official Plan for completing Area Studies (Section 2.2.4 of the Official Plan). The Area Study Addendum Report was completed to address new information that had come about since the Area Study was completed in 2014. Further, the Area Study Addendum Report was a direct outcome of the Area Study process, which recommended the completion of an OPA to implement the findings of the Area Study.

The Area Study process and process for completing the Area Study Addendum Report and OPA has included extensive consultation, including both public and stakeholder consultation. To date, Provincial ministries (Ministry of Municipal Affairs and the Ministry of Environment and Climate Change) have expressed support for the process and the recommendations.

Conclusion:

In conclusion, the OPA is consistent with the 2014 PPS, in conformity with the 2017 Growth Plan for the Greater Golden Horseshoe, and is in conformity with the County of Brant Official Plan. The OPA represents an appropriate approach to managing anticipated limited servicing availability and ensuring that development will be logical, efficient and appropriate, while providing opportunity for intensification to occur and for the County to meet its intensification target.

11. Comments from Brant Star Developments Ltd.

Brant Star Developments Ltd. submitted an email and expressed support for the OPA.

12. Comments from IBI Group

IBI Group submitted a letter dated March 1, 2018 on behalf of 2482704 Ontario Inc. in relation to lands located in the Built Boundary. Generally the letter expresses concern that the policies of the OPA do not provide enough support for lands in the Built Boundary. The letter includes some suggested modifications to wording.

We suggest that the OPA appropriately provides for intensification and infill to occur. In particular, the policies ensure that the servicing allocation policy will provide for a reserve capacity to ensure that infill and intensification can occur. We do not suggest further changes are required in response to the comments.

13. Comments from MHBC

MHBC has submitted a letter on behalf of their client, Losani Homes. Generally MHBC expresses support for the proposed OPA. The report acknowledges the recent changes to the OPA reduce the County's role in a landowners cost sharing agreement and the added importance of the servicing allocation policy. We agree with this statement. Accordingly, the OPA has been associated with additional policies to guide the County's development of a servicing allocation policy. The letter includes some comments that should be considered by the County when developing the servicing allocation policy.

14. Comments from the Ministry of Municipal Affairs (One Window)

The Ministry of Municipal Affairs has reviewed the OPA and provided comments in a letter dated February 27, 2018. The Ministry notes that there is nothing in the 2017 Growth Plan that would prevent the County from proceeding to make a decision on the St. George OPA as it would continue to support continued implementation of the Official Plan in the St. George Settlement Area. Additionally, the letter includes comments from the Ministry of Environment and Climate Change, in response to previous comments regarding the implementation of Low Impact Development principles. The Ministry encourages the County to consider LID alternatives for new development in St. George. We agree with the principle, and suggest this can be considered further as part of development application review and more comprehensively through the Official Plan Review.

15. Comments from GRCA

GRCA submitted a comment letter dated February 27, 2018. Generally the submission acknowledges that the OPA addresses the questions and concerns raised by GRCA in its letter dated November 21, 2017. The letter notes minor revisions to Schedule C-2 which we understood have been addressed by the County as part of finalizing the schedule.