

September 15, 2022

Municipality of Brockton
100 Scott Street
Walkerton, ON
N0G 2V0

Our File: #21-3200

Attention: Dieter Weltz

VIA Email

Reference: Plan the Bruce Official Plan Review – Stage 1 – Growth Management Amendment

In response to your email request of September 7, 2022, we understand that the County of Bruce has prepared a Draft Growth Management Official Plan Amendment as part of the 'Plan the Bruce Official Plan Review' and is seeking feedback from Municipal stakeholders. It is also our understanding that the County has divided the Review Process into two stages. Stage 1 would bring forward an amendment to address policy changes relating to population and employment growth. Stage 2 will implement the new Official Plan framework relating to directions from the Plan the Bruce Discussion Papers and legislative changes.

As requested, we have reviewed the proposed policies to be implemented through the Stage 1 amendment and have prepared the following comments for the consideration of Council and staff:

The proposed policies under Section 4.4.3.4 of the amendment encourage minor infill and limited non-residential development within Hamlet Communities but do not make mention of opportunities to support the rounding out of existing development. The Provincial Policy Statement 2020 (policy 1.6.6.4), recognizes the importance of not only allowing minor infilling, but also permitting minor rounding out of existing development in settlement areas, including hamlets. We recommend that in addition to supporting minor infill and limited non-residential development, language also be included in Section 4.4.3.4 that supports the rounding out of existing development to allow for modest and appropriate growth to occur.

With regard to the proposed growth management policies within Section 4.4.3.7 and 4.4.3.8 of the draft Official Plan Amendment, it is commendable that the County has recognized that the Municipality of Brockton is facing significant constraints with the supply of development lands within its Primary Urban Community. The proposed Vision of the Official Plan is appropriate to direct growth to settlement areas. However, we note an internal inconsistency between the proposed policies of Section 4.4.3.7 and 4.4.3.8. The first policy states that there is an adequate supply of land within all Primary Urban Communities, while Section 4.4.3.8 conversely acknowledges that there are constraints with the supply of land in the community of Walkerton. This policy does not provide any solution or accommodation to the issue, as there is no further direction provided.

Both the Planning Act and the Provincial Policy Statement, 2020 direct that growth and development be appropriately located in designated settlement areas where sufficient infrastructure and services are available.

Section 2 of the Planning Act identifies matters of provincial interest that municipal councils shall have regard for when making decisions relating to land use planning matters, including the appropriate location of growth and development. The PPS identifies settlement areas as the focus of growth and development, with priority given to settlement areas that have full municipal services available over non-serviced settlement areas.

It is our understanding that an expansion to the Walkerton settlement area boundary is not being considered as there is an identified surplus in the cumulative supply of residential and employment lands throughout the County as a whole. As a result, the County is not proposing to adjust the extent or distribution of settlement area lands over the planning horizon. In our opinion, this fails to address the identified emerging demands for growth and lack of supply of available growth lands in the Walkerton Primary Urban Community. This limits the ability of the Municipality to address its short term and long term demands for housing, employment and commercial land uses. We further note that since the Official Plan Review process began, there has been an accelerated consumption of development lands within the Municipality resulting in an even greater increase in demand for future growth lands within the community.

We are not of the opinion that the proposed policies of the Growth Management Official Plan Amendment sufficiently address the issue of land needs within the Walkerton Primary Urban Area. In our opinion the proposed amendment does not have regard for the matters of provincial interest under the Planning Act relating to the appropriate location of growth and development and is not consistent with the policies under the PPS that direct growth to serviced settlement areas. It is in the interest of the Municipality of Brockton to have this critical issue addressed and recommend that the County of Bruce further consider this issue at this time.

We look forward to the opportunity to working with Municipal and County staff to identify an appropriate solution to address this concern. We trust this input is satisfactory to your needs at this time and assists the County of Bruce as it moves forward with its new Official Plan. If you should you have any questions or concerns, please do not hesitate to contact the undersigned.

Respectfully Submitted,
MONTEITH BROWN PLANNING CONSULTANTS



(digitally signed by author)

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cc: Sonya Watson, CAO, Municipality of Brockton