

Planning Justification Report

Application: Plan of Subdivision
 Project Name: Eastridge Subdivision
 Location: Southwest of Walkerton Soccer Fields
 Roll Number: 410436000101822
 Owner: Municipality of Brockton
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Summary

This report is provided in support of the Municipality of Brockton's application to Bruce County for the approval of a plan of subdivision on lands that are owned by the Municipality within the Eastridge Business Park. The Municipality has developed this area of Walkerton over the past decade, and is now proposing to establish a residential plan of subdivision on the south side of Eastridge Road, southwest of the Soccer Fields. The following is a summary of key characteristics of the site and important planning considerations of this proposal.

1. The parcel is approximately 3.3 hectares in area.
2. The land is zoned Residential Low Density Multiple (R2) and designated Residential.
3. The proposal is to register a "block plan" of subdivision that divides the property into 16 parcels and 9 blocks to accommodate the development of a minimum of 51 residential units at a residential density of at least 15.45 units per hectare.
4. Each of the 16 parcels will accommodate one "half" of a semi-detached dwelling. These parcels are located along the southern boundary of the land.
5. Blocks 17, 18, 22, 24, 25, 26, 27, and 28 are intended to be used for the development of 35 townhouses. These blocks can be further subdivided through part-lot control at a later date to accommodate the separate conveyances of individual townhouse units. The blocks can generally accommodate townhouses that are 30 feet wide. Some townhouses will need to be slightly narrower to fit the proposed number of units on a couple of the blocks. It is possible that significantly narrower townhouses could be constructed to allow for most of the blocks to accommodate an additional townhouse in compliance with the minimum frontage provisions of the Zoning By-law.

6. Block 20 is in the southwest corner of the parcel and backs onto a steep slope that abuts the parkland owned by Brockton. A specific building type has **not** been planned for this lot at this point in time. The block has been designed as a large parcel to allow for flexibility in development, as the steep grade in this area presents a potential hurdle in its future development. This block should be able to accommodate at least two residential dwelling units. The block has over 15 metres of frontage, and could be used for the development of one single-detached dwelling if it is determined that it is uneconomical to overcome the grading challenges to accommodate additional units on this block.
7. The development requires the establishment of a single internal street that connects to Eastridge Road at two different points.
8. The subdivision has been designed with a series of drainage swales to allow for stormwater to be properly managed.
9. The Municipality of Brockton intends to obtain approval for a registered plan of subdivision, and to sell the lands as a package to a developer. The Municipality will enter into a purchase and sale agreement and a subdivision agreement with the purchaser following the approval of the plan of subdivision.
10. The sale of the land will proceed according to a request for proposal process. There is no specific purchaser identified at this point in time. Brockton has designed the block plan to ensure a specific form of housing will be constructed while leaving the townhouse blocks flexible to the needs of whichever developer ultimately purchases the land.
11. Brockton does not **need** to apply for a plan of subdivision to create lots. Under the Planning Act, the Municipality possess the authority to convey lands while retaining ownership of abutting lands without obtaining approval from any other entity; however, subdividing this land through a registered plan of subdivision provides for a more orderly method of dividing the land, creating a new public highway, and allowing for structured public consultation in relation to the process.
12. The proposal is consistent with the Provincial Policy Statement, conforms to the Bruce County Official Plan, conforms to the Walkerton Official Plan, the lots comply with the provisions of the R2 zone in the Zoning By-law, and the layout has regard for the criteria in section 51(24) of the Planning Act.

Supplemental Materials

The following supplemental submission materials have been developed to support the application for a plan of subdivision:

1. Draft subdivision plan by Hewett and Milne
2. Conceptual Servicing Plan by B.M. Ross
3. Grading plan by B.M. Ross
4. Conceptual Development Layout by B.M. Ross
5. Functional servicing report by B.M. Ross
6. Geotechnical study by Chung & Vander Doelen

A stage 1-2 archaeological study was also previously completed on these lands in relation to the establishment of the surrounding Eastridge Business Park. This study has already been reviewed by Saugeen Ojibwe Nation and has been entered into Ontario's Public Register of Archaeological Reports.

Brockton has not prepared an environmental impact study or a traffic impact study as part of this subdivision application. There are no sensitive environmental features that are proximal to the site which warrant the completion of an environmental impact study. The proposed number of residential units is minor, and there will therefore be no road improvements or traffic controls necessary to accommodate this minor and expected form of residential development in this area.

Planning Analysis

The sections of the Planning Act with statutory relevance to the subject applications include section 3(5), and section 51(24). The contents of these sections are noted, and an analysis is provided in relation to these requirements.

Section 3(5)

Section 3(5) of the Planning Act states:

(5) A decision of the council of a municipality, a local board, a planning board, a minister of the Crown and a ministry, board, commission or agency of the government, including the Tribunal, in respect of the exercise of any authority that affects a planning matter,

(a) subject to a regulation made under subsection (6.1), shall be consistent with the policy statements issued under subsection (1) that are in effect on the date of the decision; and

(b) shall conform with the provincial plans that are in effect on that date, or shall not conflict with them, as the case may be.

Section 51(24)

Section 51(24) of the Planning Act states:

(24) In considering a draft plan of subdivision, regard shall be had, among other matters, to the health, safety, convenience, accessibility for persons with disabilities and welfare of the present and future inhabitants of the municipality and to,

(a) the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;

(b) whether the proposed subdivision is premature or in the public interest;

(c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;

(d) the suitability of the land for the purposes for which it is to be subdivided;

(d.1) if any affordable housing units are being proposed, the suitability of the proposed units for affordable housing;

(e) the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;

(f) the dimensions and shapes of the proposed lots;

(g) the restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;

(h) conservation of natural resources and flood control;

(i) the adequacy of utilities and municipal services;

(j) the adequacy of school sites;

- (k) the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;*
- (l) the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy; and*
- (m) the interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated under subsection 41 (2) of this Act or subsection 114 (2) of the City of Toronto Act, 2006.*

The proposed subdivision application must therefore demonstrate consistency with the Provincial Planning Statement (PPS, 2024) and have regard for the criteria under section 51(24). Section 51(24) requires the proposal to have regard as to whether the plan (of subdivision) conforms to the official plan. This report summarizes the proposal's consistency with the PPS and its conformity to the Official Plans.

Provincial Planning Statement

The Provincial Planning Statement (PPS, 2024) provides the following general direction that relates to the subject development:

1. Planning authorities shall provide for a range and mix of housing types that efficiently use land, resources, and infrastructure.
2. Planning authorities must properly plan for the necessary infrastructure to accommodate new growth, and must ensure adequate water and wastewater servicing to accommodate new development.
3. Residential uses should be separated from Employment uses in order to avoid conflicts.
4. Development is to be primarily directed to settlement areas.

The proposal is to allow for a plan of subdivision to accommodate the development of at least 51 dwelling units that will be a mix of semi-detached dwellings and townhouses. It should be noted that this proposed subdivision is adjacent to another parcel of land that Brockton has sold to Bruce County, which will be used for the construction of a new affordable housing apartment building. This proposed development of semi-detached dwellings and townhouses will compliment the abutting apartment development, and together these projects will form a new residential neighbourhood with an ideal mix of housing types that are compatible and consistent with other forms of housing in Walkerton. The Municipality has sufficient servicing capacity to accommodate this new residential development.

The proposed development is an appropriate and desirable form of residential development within a settlement area, and the proposal is consistent with the PPS.

Bruce County Official Plan

The subject lands fall within the "Primary Urban Community" designation of Walkerton. The Primary Urban Community designation of the County Official Plan follows the direction of the PPS, and provides the following direction:

1. The majority of development is to be directed to these areas.
2. A range of housing types is required to meet the broad range of needs of County residents.
3. Intensification of urban areas is encouraged.

4. Adequate servicing is to be planned for and provided by municipalities.
5. Negative impacts are to be avoided and mitigated (e.g. impacts to sensitive environmental features).
6. The County Plan does not contain a minimum density requirement for residential development. This minimum is addressed by the Walkerton Official Plan.

The development of a residential neighbourhood of semi-detached dwellings and townhouses is expected and encouraged by the Bruce County Plan.

Walkerton Official Plan

The subject lands are designated Residential in the Walkerton Official Plan. The Residential policies are contained in section 3.1 of the Plan. The following are relevant requirements and directives from this section:

1. The Walkerton Plan has a goal of providing opportunities for a range of housing types and densities to accommodate a diversity of lifestyles, age groups, income levels, and persons with special needs in order to create a complete community.
2. The Plan promotes the efficient use of existing and planned infrastructure.
3. Development should compliment the character of existing neighbourhoods.
4. The Plan encourage housing forms and densities designed to be affordable to moderate and low income households.
5. The residential portion of all subdivisions with full services shall have a minimum density of no less than 15 dwelling units per gross developable hectare.
6. Medium density residential development (townhouses) shall have a maximum density of 35 units per hectare.

The proposed subdivision will have a density of at least 15.45 units per gross hectare as at least 51 units will be constructed on the 3.3 hectares per the concept plan. As is explained in the following Zoning section, some of the townhouse blocks may accommodate an additional unit. Furthermore, Block 20 will likely have one or two units constructed on it depending on what is ultimately proposed by a developer after accounting for the challenging grading. The final development may therefore have a density somewhere between 51 and 60 units, which provides for a density range of 15.45-18.18 units per hectare. This density conforms to the minimum and maximum established by the Walkerton Plan.

The proposed development provides for a range and mix of housing types and efficiently uses new infrastructure that is located at the boundary of the development. This is a relatively new neighbourhood with few abutting residential land uses. The existing neighbouring residential uses are mid-rise apartment buildings. This development compliments the character of the existing residential uses and provides an injection of some lower-density and alternative forms of housing in this neighbourhood.

The proposed subdivision conforms to the Walkerton Official Plan.

Brockton Zoning By-law

The lands are currently zoned R2. The following table summarizes the standard provisions for the R2 zone.

Provision	Semi-detached	Townhouse
Minimum Area	232.5 square metres	155 square metres
Minimum Frontage	7.5 m (25 ft)	7.5 m (25 ft)
Minimum Front yard	6 m	6 m
Minimum Rear Yard	7.5 m	7.5 m
Minimum Interior Yard	1.2 m	3 m (end unit)
Minimum Exterior Yard	4.3 m	6 m
Maximum Lot Coverage	35 %	40 %

The 16 lots that are proposed for semi detached dwellings are all at least 350 square metres in area, and all have proposed frontages of 10.3 metres. These dimensions exceed the minimum 232.5 m² lot area and minimum 7.5 m lot frontage requirements of the zoning by-law. The R2 zoning also permits single detached dwellings; however, the standard provisions require a minimum frontage of 15 metres for a new single. Should a developer desire to construct a single-detached dwelling on these lots in the future, a single could potentially be permitted through a zoning by-law amendment or variance on any of these lots.

The proposed townhouse blocks greatly exceed the minimum lot dimension requirements. The blocks are sufficiently sized to allow for a total of 35 townhouses with a frontage of 30 metres to be developed throughout the subdivision. The following table demonstrates how many units can be constructed in each block if each of the townhouse units are 30 feet wide. It should be noted that Blocks 22 and 25 are short a few centimetres to accommodate the projected number of townhouse units for those blocks. This shortfall can be addressed by designing townhouses that are slightly less than 30 feet wide. It should also be noted that Block 24 is irregular in shape. This block can accommodate 6 units, but the units will need customization in order to comply with the zoning requirements. The concept plan illustrates how rows of townhouses that are 30 feet (9.144 m) wide can generally fit into the proposed blocks.

Block	Number of Units	Available Building Envelope After Accounting for Setbacks	Townhouse Row Width	Surplus Block Width @30 ft Frontage
17	5	45.76 m	45.72 m	+ 0.04 m
18	3	28.4 m	27.432 m	+ 0.97 m
22	4	36.5 m	36.576 m	- 0.08 m
24	6	Irregular	Irregular	Irregular
25	4	36.57 m	36.576 m	- 0.01 m
26	4	37.2 m	36.576 m	+ 0.57 m
27	4	37.4 m	36.576 m	+ 0.82 m
28	5	46.2 m	45.72 m	+ 0.48 m

Blocks 17, 22, 25, 26, 27, and 28 have sufficient width to allow one (1) additional townhouse to be constructed on each block if the townhouses are designed to have narrower frontages closer to the

minimum of 7.5 metres. Whether the units end up being roughly 25 feet wide or 30 feet wide is not particularly important at the block plan of subdivision phase. The final townhouse unit width will be determined by the design proposed at the building permit and part-lot control stage of the development process.

Section 51(24) Analysis

Section 51(24) of the Planning Act contains a list of criteria that must be considered when approving a plan of subdivision. It is important to consider these criteria, as they often address matters that are not recognized by Official Plan policies but that have significant impacts on the public interest. For example, Official Plans often lack policies that guide how new roads should be laid out in a new plan of subdivision. Several criteria under Section 51(24) allow for this layout to be established in a logical pattern even in the absence of specific policies related to this requirement. An assessment of these criteria relative to this proposal is provided in the following table.

Criterion	Assessment
(a) the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;	Consistency with the PPS has been reviewed. This proposal presents no concerns in relation to provincial interests. The proposal allows for the development of a mix of housing types, which is encouraged by the PPS.
(b) whether the proposed subdivision is premature or in the public interest;	The proposal is not premature as all relevant considerations have been appropriately addressed. Furthermore, the Municipality is the proponent and will ensure outstanding detailed design matters are addressed through contract provisions in the purchase and sale agreement and the related subdivision agreement.
(c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;	The proposal conforms to both official plans.
(d) the suitability of the land for the purposes for which it is to be subdivided;	The subject lands are suitable for the proposed residential uses and the lands are appropriately zoned and designated for such uses.
(d.1) if any affordable housing units are being proposed, the suitability of the proposed units for affordable housing;	Affordable housing units are being provided on the abutting parcel to the north-east that was formerly part of the same parcel and that has been sold by Brockton to Bruce County.
(e) the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;	The singular internal road that is proposed as part of this subdivision will form a through-road that connects to Eastridge Road at two different points. Eastridge Road is a relatively new street that is fully serviced and that is capable of providing appropriate access to the development.
(f) the dimensions and shapes of the proposed lots;	The proposed lots are regular in shape and have adequate area and frontage for the proposed uses. The 16 lots for semi-detached dwellings have been

	<p>designed with a width that intentionally encourages the construction of semi-detached dwellings.</p> <p>The townhouse blocks have been designed to accommodate unit widths of 25-30 feet and to ensure the minimum density targets are achieved.</p> <p>In general, the layout of the single internal street and the width and depth of the blocks have been designed to maximize the available space on the property while accommodating a range of residential uses.</p>
(g) the restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;	<p>The proposed residential uses comply with the zoning provisions that currently apply to the lot.</p> <p>The functional servicing report provides direction regarding the grading of the southern boundary of the property. The lot slopes down on the southern border, and this area must be built-up with a rear yard swale to allow for appropriate development of the land.</p> <p>A specific building type has not been proposed for Block 20, as the development of this block will require customization that accounts for the grading challenges and the related costs of dealing with required fill and/or retaining walls.</p>
(h) conservation of natural resources and flood control;	<p>A functional servicing report has been provided that explains the stormwater management design and the related blocks and easements that are necessary to implement this design.</p>
(i) the adequacy of utilities and municipal services;	<p>The lots will be serviced with municipal water wastewater, and stormwater. The developer will be responsible for constructing the pipes internal to the site. There is adequate capacity in these municipal systems.</p>
(j) the adequacy of school sites;	<p>This is a relatively small development of 50 units. It is assumed that the school system in the region has capacity to handle this growth.</p>
(k) the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;	<p>The necessary easements have been identified in the draft subdivision plan and their purpose is identified in the functional servicing report.</p>
(l) the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy;	<p>Not applicable.</p>
(m) the interrelationship between the design of the proposed plan of	<p>Not applicable.</p>

subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated under subsection 41 (2) of this Act or subsection 114 (2) of the City of Toronto Act, 2006.	
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Conclusion

The proposed subdivision will enable the development of at least 51 semi-detached and townhouse dwellings. The proposal is consistent with the Provincial Planning Statement, the Bruce County Official Plan, the Walkerton Official Plan, the Walkerton Zoning By-law, and has regard for the criteria under section 51(24) of the Planning Act.