

April 11, 2022

Jack Van Dorp
Manager of Land Use Planning
Department: Planning & Development
30 Park St.
Walkerton, ON N0G2V0

Dear Mr. Van Dorp:

RE: Input on Phase 2 of Plan of Bruce – Preparation of Draft Official Plan
10th Concession Road, Town of Saugeen Shores
OUR FILE: Y509BN

On behalf of our client, Brad Pryde, we have been monitoring and providing input to the Official Plan Review of the County of Bruce (“Plan the Bruce”) and submit this for consideration as part of the next steps of the process.

Our client owns lands in the Town of Saugeen Shores, (Port Elgin) and has requested consideration for the expansion of the urban area to include the lands to assist with achieving the County growth forecasts. The lands are located to the north of Concession 10, west of Highway 21 and east of Pegasus Trails subdivision. The lands are directly adjacent to the existing urban area, have the potential to be connected to services and are located to accommodate a logical extension of the existing road network.



We are requesting that the subject lands be considered as a future settlement area boundary expansion to support the population and household forecasted for the County and specifically to accommodate the forecasted growth for the Town of Saugeen Shores.

We have reviewed the Discussion Papers, specifically the “Good Growth” Discussion Paper. The focus of this letter is on the growth forecasts and land needs analysis that will be considered as the County prepares the draft Official Plan. The Discussion Paper presents a high level residential land needs analysis (Appendix E) based on determining supply and comparing with the forecast growth for each municipality. There seems to be conflicting information as it relates to the forecasted households. For example, the population and housing forecast identifies the need for a total of 4,235 households within the Town of Saugeen Shores

from mid-2016 to mid-2046 (Figure B-11), whereas the residential land needs analysis identifies a unit forecast (2021-2046) of 3,210 households. We understand that the recent population growth in the Town has exceeded the historic growth that was utilized in the land needs analysis. The new growth should be considered and the land needs analysis reviewed accordingly.

The Town of Saugeen Shores is expected to accommodate the largest share of permanent housing growth over the 2021-2046 forecast, with 34% of County wide new housing development. Based on our understanding of the market in Saugeen Shores, there has been significant market demand over the recent year for new housing units with an increase of absorption of housing units. The housing forecast and supply should consider the demand and reflect building permit data. A more refined approach to the Land Needs Analysis should consider demand and supply at a municipal level to assess the ability for growth to occur in a coordinated and orderly manner based on existing or planned servicing infrastructure within areas of the County that are positioned to accommodate growth and development.

The land needs analysis and considerations for population and housing growth are presented in the Discussion Paper, however there are assumptions and detailed information that is not included that makes it difficult to fully analyze the findings. A fundamental requirement of provincial policy direction (PPS Policy 1.4.3) is to consider the household forecast and provision of housing choice (housing by housing type) in municipalities. The land needs analysis approaches land needs from a County-wide perspective and not at a sub-regional (municipal) market area perspective by housing type. The Discussion Paper recommends a County-wide approach for the land needs, however a sub-regional market approach for affordability. In our opinion, affordability and the provision of housing choice by housing type are interconnected and should be assessed at the sub-regional market level. A sub-regional market area analysis is important in the consideration of providing an appropriate range and mix of housing options and densities to meet projected affordable housing needs of current and future residents.

In calculating the existing housing supply, the supply analysis includes "unit capacity of vacant residential lands" and "units in active development plans". We would appreciate receiving the information associated with the determination of the unit capacity and the vacant residential lands to understand the assumptions in determining the unit capacity. We request the opportunity for further discussion as it relates to the assumptions used in the determination of existing housing supply.

The land needs analysis does not provide a breakdown of the unit supply by residential housing type and how the supply compares to the forecast demand of residential housing type. We believe this is important to understand given the requirements of the PPS for all municipalities to provide for the appropriate range and mix of housing options and density.

We understand the next phase of Bruce County Official Plan update will be to utilize the recommendations from the Discussion Papers to prepare a draft Official Plan. We would appreciate the opportunity to discuss the comments in this letter and fully understand the land needs analysis as it will inform the draft Official Plan and policy framework for growth in the Town of Saugeen Shores.

In conclusions, there is a strong demand for low rise housing types and apartments in the Town of Saugeen Shores and the supply of new housing units is being developed at a rapid pace in new development projects. The demand for new housing units will increase over the forecast period and planning for additional demand at this time will ensure there is a long term supply to support growth and not further the housing crisis. Planning for growth and the potential for settlement expansion on the subject lands will support a logical extension of the settlement area and efficient use of planned services and infrastructure.

We look forward to further to discussion on this request.

Yours truly,
MHBC

A handwritten signature in black ink, appearing to read 'DAA', followed by a long horizontal line extending to the right.

David Aston, M.Sc., MCIP, RPP
Partner

c. Brad Pryde, Jay Pausner