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File No.: 2019-05

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Municipality of South Huron
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- And -

Craig Metzger, MCIP, RPP
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**RE: South Huron Official Plan Amendment Application
70786 Bluewater Highway, Municipality of South Huron
Tridon Properties Ltd.**

Further to the comments received by Huron County and the Municipality of South Huron on July 10, 2020, please find enclosed the following updated reports and documents for the above-noted Official Plan Amendment Application:

- Revised Housing Market Research Study, prepared by Gregory Thompson Consulting;
- South Huron Regional Market Area Assessment, prepared by N. Barry Lyon Consultants Ltd. and dated August 2020;
- Revised South Huron Official Plan Amendment Application Form; and,
- Revised Environmental Impact Study, prepared by Natural Resource Solutions Inc..

Tridon Properties Ltd., had included a Housing Market Research Study to assess the housing market and the need for additional residential land within the settlement area, in keeping with the policies of the Provincial Policy Statement ('PPS'), the Huron County Official Plan ('County OP'), and the South Huron Official Plan ("South Huron OP") as part of the application submitted on May 15th, 2020. The Study was based on the Regional Market Area, which Gregory Thompson Consulting assumed included a portion of Lambton Shores. Staff from South Huron, through the comments received on July 10, 2020, requested additional analysis to justify this definition of the Regional Market Area, which does not align with the definition in the South Huron OP.

Section 7.4.4.2.4 of the South Huron OP defines the Regional Market Area as “an area, generally broader than a municipality, that has a high degree of social and economic interaction. Huron County is considered the Regional Market Area for the purpose of applying this definition.” This definition is narrower in interpretation than the Provincial Policy Statement, which defines the Regional Market Area as “an area that has a high degree of social and economic interaction. The upper or single-tier municipality, or planning area, will normally serve as the regional market area. However, where a regional market area extends significantly beyond these boundaries, then the regional market area may be based on the larger market area. Where regional market areas are very large and sparsely populated, a smaller area, if defined in an official plan, may be utilized.”

To determine the appropriate Regional Market Area, based on economic and social analysis specific to the Port Blake Planning Area, Tridon Properties Ltd., retained N. Barry Lyon Consultants Inc. to evaluate the position that the Grand Bend area forms part of the Regional Market Area for the Site. The South Huron Regional Market Area Assessment, prepared in August 2020 concluded that:

- In the eyes of residents and most homebuyers, the Port Blake area is part of the Grand Bend community, despite its location in a separate municipality and county. Residents of the Port Blake area would have a greater number of social and economic connections to Grand Bend (Lambton Shores) than they would to anywhere else in Huron County, relying primarily on the community of Grand Bend for community and commercial amenities.
- The connections between these two communities are also evident when examining the socioeconomic characterization of both areas - both Port Blake and Grand Bend are characterized as having an older population and as a seasonal community. In addition, both communities have similar housing stock, with an abundance of older cottage-type residences and new large custom-built residences.
- Port Blake is closer in character to Grand Bend than to South Huron or Huron County. It is therefore reasonable to assume that Grand Bend and Port Blake are part of the same Regional Market Area, as assumed in Tridon’s housing market analysis conducted by Gregory Thompson Consulting. This view is also in line with the PPS definition that a Regional Market Area can extend beyond municipal boundaries, assuming there is a high degree of social and economic connections, which is clearly the case in this situation.
- The primary issue moving forward is that other areas of South Huron are likely more similar in context to the rest of Huron County than Grand Bend. Therefore, amending the definition in the South Huron OP must be undertaken carefully, either as a site-specific amendment or with language similar to limit the inclusion of Grand Bend only where assessment is being undertaken for the Port Blake Planning Area.

Based on the analysis and conclusions in the South Huron Regional Market Area Assessment, it is respectively requested that the South Huron Official Plan Amendment filed on behalf of Tridon Properties Ltd., in relation to 70786 Bluewater Highway, Municipality of South Huron be amended to add the following specific policy to the Port Blake Planning Area section:

7.10.1.1 Port Blake Regional Market Area

Notwithstanding Policy 7.4.4.2.4, for the purposes of the Port Blake Planning Area, the *Regional Market Area* shall be defined as Huron County and the adjacent urban settlement area of Grand Bend.

We trust the information contained herein and the attached amended reports and documents are satisfactory to issue the Notice of Complete Application. Should you have any questions or comments, please let us know and we would be happy to discuss further.

Kind regards,



Caroline Baker, MCIP, RPP
Principal

c.c Don de Jong, Tridon Properties Ltd.