



Northumberland Growth Management Strategy Report
Municipality of Brighton Perspective

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1.0 INTRODUCTION

At its meeting of March 3, 2009, the Municipality of Brighton's Growth Management Advisory Committee supported a resolution to engage EcoVue Consulting Services Inc. to undertake work to prepare a Brighton Growth Management Strategy, including provisions for inclusion in the Official Plan.

On May 21, 2009, the Committee considered EcoVue's May 12, 2009 report on Stage One of this work having to do with the Community Orientation and Strategy Launch. This included a new branding for the project, introductory content for the web site and a media release. These have been approved, as amended.

The Committee also authorized the commencement of Stage Two of the work and, in particular, requested the production of a report on the May 13, 2009 consultant's report on a Growth Management Strategy for the County of Northumberland and its member municipalities. This report responds to that request.

2.0 POLICY AND LEGISLATIVE CONTEXT

In June 2005, the Province of Ontario adopted the *Places to Grow Act*, an initiative designed to manage population and employment growth in a way that builds complete communities based on the efficient use of land, resources and existing infrastructure. The Act enables the identification and designation of growth plan areas and strategic growth plans. These identify the location and pace of regional growth, guiding government investments. The first Growth Plan applies to the Greater Golden Horseshoe, (2006) which includes Northumberland County with Brighton at its eastern limit. A second growth plan is currently being developed for Northern Ontario.

The Growth Plan for the Greater Golden Horseshoe (GPGGH) encourages cities and towns to develop as complete, compact communities. It requires that a significant portion of new growth be directed to existing built-up areas through intensification, and that major growth be directed to settlement areas serviced by municipal water and waste water systems. The Growth Plan sets out a vision for the year 2031, including specifics on growth, infrastructure, natural heritage, agriculture, rural areas and mineral aggregate resources.



3.0 NORTHUMBERLAND GMS REPORT SUMMARY

In January of 2008, County of Northumberland and its member municipalities commissioned a planning report on an overall growth management strategy for Northumberland. The Northumberland Growth Management Strategy (NGMS) is intended to “support the needs of the seven local municipalities, conform to the policies of the GPGGH and other relevant provincial policies and provide the relevant information to input into the 5 Year review of the growth forecasts outlined in policy 2.2.1.2 of the Growth Plan”¹.

The primary purpose of the NGMS report is to make recommendations on how the GPGGH population and employment growth numbers for Northumberland should be allocated to the seven member municipalities, including Brighton. In addition, recommendations are proposed for:

- The amount of proposed population growth that should be in the form of intensification;
- The allocation of population in terms of the rural/urban split; and
- The minimum density to be applied to new development in designated Greenfield areas.

The GPGGH establishes a population increase for the County of Northumberland from 80,000 in 2001 to 96,000 in 2031, representing an increase of 16,000 people. The Growth Plan indicates that the number of jobs in Northumberland will increase from 29,000 in 2001 to 33,000 in 2031, an increase of 4,000, or one job for every increase in population of four persons.

The NGMS report recommends:

- That population allocation should be based on an 85/15 urban/rural split;
- That allocations should be generally based on capacities to support growth;
- That the percentage of population that should be accommodated by way of intensification is 40;
- That rules/policies are needed to control growth that may exceed forecast population/employment numbers;

¹ Executive Summary Growth Management Strategy Phase 1 – Components 1 and 2 (Final Report) Meridian Planning Consultants Inc., October 8, 2008,



- That population projections alternative to the Schedule 3 Growth Plan projections should be considered;
- That the ratio of jobs to new persons that is used for the purpose of employment growth should be 1:2.4 instead of 1:4;
- That the only member municipality in which additional land is required for employment is Brighton;
- That the minimum density of development on Greenfield lands should be 30 persons and jobs per hectare.

It also recommends five principles to guide a Growth Management Strategy:

1. The majority of new growth is to be accommodated on lands that can be serviced by municipal water and sewer services;
2. Only population growth that can be serviced by existing wastewater treatment and sewage treatment infrastructure (i.e. where reserve capacity exists) should occur in urban areas;
3. Population growth through intensification shall be a priority within the built boundaries of the six fully serviced communities in the County;
4. There has to be a willingness to review the extent and location of Hamlet and Settlement Area designations in rural areas that are not serviced by full municipal services; and
5. There has to be a willingness to further restrict rural lot creation in the form of consents in the local Official Plans on a go-forward basis.

4.0 NORTHUMBERLAND GROWTH MANAGEMENT STRATEGY ANALYSIS

We have undertaken a review of the analyses and recommendations set out in the NGMS report. A portion of this work is drawn from detailed analyses undertaken as part of our earlier work in the development of the Brighton Official Plan.

4.1 GPGGH AND NGMS POPULATION ALLOCATIONS

The Growth Plan determined that if trends were to continue based upon “the current (circa 2005) level of policy intervention, current and future settlement patterns, and the provision of necessary infrastructure to support growth”, the population of Northumberland was expected to reach 99,000 by 2031.



As set out in Schedule 3 to the GPGGH, the Province has determined that the population of Northumberland County will increase from 80,000 in 2001 to 96,000 by 2031, an increase in population of 16,000 persons. The figure of 96,000 established by MEI assumes significant policy and economic intervention by the Province through planning and development policy directives and targeted infrastructure investment, with a stronger growth focus to the west.² The population of Northumberland has increased at a higher rate than the GPGGH had anticipated, with an increase in population of 3,705 persons by 2006. As a result, the total number of additional persons which can be accommodated between 2006 and 2031 is 11,837 persons. The NGMS allocates the population growth of 11,837 persons amongst the member municipalities of Northumberland for the period 2006 to 2031

The NGMS also offers some alternate scenarios for growth, to address the demonstrated discrepancies between the Schedule 3 allocations and actual rates of growth and population figures for 2006. The NGMS suggests three population growth models, which are as follows:

- A projection using Growth Plan numbers to 2036
- A higher PTG⁺ projection based on the 2001 to 2006 growth rate and migration trends; and
- A higher PTG⁺⁺ projection based on significant new job growth in Northumberland.

4.2 ALLOCATIONS TO LOWER TIER MUNICIPALITIES

In order to determine actual allocations of this overall growth in population to each lower municipality, the NGMS assumes that the relative size of each lower tier municipality in 2006 represents an appropriate percentage of the population which should be projected into the future.

The report states that the allocation of growth to member municipalities is based on the policies of the Growth Plan and the Provincial Policy Statement, such that the population allocation for

² Hemson Consulting Inc., *The Growth Outlook for the Greater Golden Horseshoe*, January 2005, "The basis for the Outer Ring distribution scenarios", page 33.



urban areas is 85% and for rural areas 15%. The urban population (85% of the total to be allocated) has been allocated to each member municipality based on an analysis of a number of variables that related to the size of the urban community, the amount of infrastructure available and amount of designated land. The rural population has been allocated amongst the rural settlement areas on a municipality by municipality basis solely of the amount of designated land in the rural settlement areas. This method for establishing percentage allocations does not take into consideration any difference in the changes in the rates of growth experienced in the lower tier municipalities.

The NGMS has determined that the percentage of growth to be allocated to Brighton is 10.94% of the total available to Northumberland. Using this means for allocating growth, the resulting increase in population for Brighton is 1295 persons by 2031, with 1230 persons allocated to the urban centre of Brighton and 65 persons allocated to the rural settlement areas. There is no allocation for rural residential and farm-based populations. As a result, NGMS has determined that the total population of Brighton will be 11,548 by 2031. The NGMS growth projections for Brighton are presented in “**Table 1 - Population Growth in Brighton to 2031 - EcoVue and NGMS Projections**”,

The NGMS suggests an alternative Growth Scenario (PTG⁺) which more closely reflects Ministry of Finance projections and results in a projected increase in population of 2498 persons to Brighton, of which 2373 would be allocated to the Brighton urban area and 125 persons

Table 1 - Population Growth in Brighton to 2031 - EcoVue and NGMS Projections

Northumberland Growth Management Study							
Population Growth in Brighton to 2031 - EcoVue and NGMS Projections							
	2001	2006	2010	2016	2021	2026	2031
Actual	9450	10253	(-)	(-)	(-)	(-)	(-)
ECSI low (5%)	9450	9921	10417	10938	11415	12059	12,662
ECSI - average (7.8%)	9450	10187	10982	11861	12810	13835	14,942
Places to Grow (NGMS)	9450	10253*	—————→				11,548
PTG* (NGMS)	9450	10253	—————→				12,751
PTG** (NGMS)	9450	10253	—————→				14,840

* Census results for 2006



allocated to the rural settlement areas. According to the PTG+ allocation the total population of Brighton will be 12,751 by 2031.

A third Scenario proposed by Meridian projects a total population for Brighton of 14,840 by 2031. The NGMS population projections assume that the ratios between the populations of Cobourg, Port Hope Brighton and Trent Hills, as well as the more rural areas will remain constant.

4.2 MUNICIPALITY OF BRIGHTON GROWTH PROJECTIONS

What the NGMS does not acknowledge is the rate of growth in Brighton, relative to other areas in the County. Given that Brighton's rate of growth is more closely aligned with changes to the population dynamics of the Belleville and Trenton areas than those of the GTA, it is not reasonable to expect that the rates of growth experienced elsewhere the County are directly applicable to the Municipality of Brighton. In particular, the massive expansion of the Canadian Forces Base Trenton – just 18 km from Brighton – is expected to result in an increase in population within both Quinte West and Brighton.

As noted above, the NGMS has allocated a population of 11,548 to Brighton by 2031. Population forecasts developed for the Municipality of Brighton by EcoVue as part of the Background Review carried out for the new Official Plan indicate that the population of Northumberland and for the Municipality of Brighton will exceed the Schedule 3 allocations prepared by the MPIR, now MEI.

Growth projections for the Municipality of Brighton, developed by EcoVue Consulting Services Inc. during the preparation of the Background Study for the municipality's new Official Plan, are also presented in “**Table 1 - Population Growth in Brighton to 2031 - EcoVue and NGMS Projections**”. The population projections are based on both a conservative growth rate of 5% and an average growth rate of 7.8%. The latter was calculated by EcoVue based on growth trends for the former Township, the former Village and the Municipality of Brighton from 1966 to 2006. The more conservative projection of growth rates for Brighton, based on rates of growth from 1996 to 2006 (5%), would result in a population of 12,660 persons by 2031. Based on the average rate of growth in the municipality since 1996, the population will total 14,942 persons by

2031. These figures are more closely aligned with the PTG+ and PTG++ allocations developed by Meridian for the NGMS.

4.3 EMPLOYMENT PROJECTIONS

The Growth Plan anticipates the addition of 4,000 new County jobs, (2001 to 2031, to 33,000) or one job per 4 new people, requiring an estimated 41-54 gross hectares of employment land. Based on employment growth of approximately 1,000 between 2001 and 2006, there are now some 3,000 jobs left to allocate. Since there are currently 339 gross hectares designated within built boundaries in member municipalities communities, the NGMS recommends that there is no need to designate any additional employment lands.

The exception to this rule is the Brighton urban area, where the amount of designated employment land is insufficient to maintain an appropriate live/work ratio. This is good news for Brighton, where a shortage of industrial land has been recognised for some time.

4.4 URBAN/RURAL ALLOCATIONS

The Growth Plan attempts to manage the future allocation of approximately 3.7 million people. Of that total, only 0.43 per cent is allocated to Northumberland. The Brighton share represents a further division of that amount.

The NGMS proposes that the allocation of this future population should be based on an 85/15 urban/rural split. The allocation to the Municipality of Brighton is to be comprised of shares of both the urban and the rural components. The Report states that "Given that there are 11,837 people to allocate in the County, 85% of that amount would be 10,061 and 15% of that amount would be 1,775."

On the matter of this proposed 85/15 urban rural split, NGMS states this: "*Based on the policies of the Growth Plan and the Provincial Policy Statement, it is recommended that the population allocation for urban areas be 85% and for rural areas 15%.*" The 85/15 split is a reasoned proposal from the consultant based on its interpretation of provincial policy. In fact, there are no such percentages set out in either provincial document, nor in any of the available background reports prepared by the Province in advance of the GPGGH.

The NGMS report recognises that rural growth constitutes a higher proportion of overall growth in Northumberland than the proposed 85/15 split. The report states:



“It would appear that about 25% to 30% of all new dwellings in the County were located on lands that are not within the six urban communities. However, sustaining that level of rural development is not currently supported by the Growth Plan and the Provincial Policy Statement and is even less supported when there is infrastructure in the form of reserve capacity in the County’s sewage treatment plants to accommodate a significant amount of population. As a result, it is recommended that the urban/rural split be set at 85/15.”

The percentage allocation put forward by the consultant represents a huge departure from the existing rural urban balance which appears to be closer to a 51/49% split in favour of the urban centres. This fact is supported by a review of the rural/urban population of Northumberland and Brighton (Village and Township) in 1996, the last Census year before restructuring. At that time the total population of the County was 77,497, with 39,150 (50.5%) persons living in the settlements areas of Brighton, Campbellford, Cobourg, Colborne, Hastings and Port Hope and the balance of 38,347 (49.5%) living outside these settlement areas.

In 1996, the population of the Township of Brighton was 4438 (49.8%) and the population of the Village of Brighton was 4584 (50.2%). If we project the numbers provided by the consultant to the Municipality of Brighton in their Table “Final Allocation,” we find that the total population for the rural area of Brighton in 2031 is 15 persons greater than it was in 1996 and approximately 196 persons less than it was in 2001. EcoVue questions the logic of this approach.

The forecast assumes a significant shift in the allocation of new development to urban versus rural growth is expected to be achieved. As the consultant points out on page 14 of the NGMS, existing land use designations provide for between 73,516 and 113,730 additional people on lands within the County's 45 settlement areas. Many of these 45 settlement areas are small, unserviced hamlets. Further, the consultant notes that the projected population increase does not include the potential population increase that may occur in rural areas as a result of development on vacant lots of record, new development on lots to be created by consent, and development on lands that are currently designated for Country Residential or Estate Residential development. Section 2.2.9.3 of the Growth Plan effectively 'grandfathers' any development in rural areas that had zoning or designation on the effective date of the Growth Plan.

- It would appear that this urban/rural allocation is neither justified nor attainable; it perpetuates a GPGGH/PPS centred view that rural Ontario should remain sparsely populated and focused primarily on the production of food and resources for urban populations.

Table 2 - Urban/Rural Growth Allocations to 2031

	Census Population	Census Population	Census Population	Census Population	PTG Allocation
	1996 - (%)	1996	2001	2006	2031
Brighton - total	100	9022	9450	10253	11548
Urban	50.5	4584	4772	5178*	6408
Rural	49.5	4438	4678	5075*	5140
County of Northumberland		74,437	77,497	80,963	96000

* approximate, based on urban/rural percentage

4.5 INTENSIFICATION TARGETS

The Growth Plan establishes a Northumberland target of 40 per cent for the amount of new population growth that should be directed to and accommodated in existing built up areas.

The NGMS report concludes that much more than 40 per cent of new Northumberland population growth could be accommodated within the existing built up areas, but recommends that the Growth Plan target of 40 per cent be accepted, since the infrastructure and land required for such intensification is currently available within existing built up boundaries.

Although it may be possible to accommodate the projected growth within existing built up areas, utilizing currently available infrastructure in higher density developments, this does not mean that 40% of the new population will be inclined to settle in these particular areas or that they will choose to occupy units created through intensification. In fact, the NGMS does not anticipate this 40% target to be achieved in all areas of Northumberland.

The report states in a previous section that much of the growth in this area can be attributed to in-migration rather than to net natural growth. (births minus deaths) This suggests that the area is sought after not only by young people settling into careers and raising families, but also by

people 45 and over seeking a calmer life-style environment consistent with a reduced career pace and with semi-retirement and retirement³. Many of these newcomers may seek housing in rural residential and rural settlement areas instead. Given the existing supply of rural residential lots of record, it may be some time before the 40% targets are attained in the municipality.

- **The 40% intensification goal put forward in the NGMS report is not particularly relevant to the Municipality of Brighton. While urban sprawl and loss of the rural landscape is undesirable in this community, so too is a growth scenario for the municipality which is unachievable and insensitive to the realities of its rural population, rural settlements and community structure.**

4.6 GREENFIELD MINIMUM DENSITY

The Growth Plan establishes a minimum regional target of 50 persons and jobs per hectare for new Greenfield development. It also permits a reduced density target in the outer ring of the Growth Plan area, which includes Brighton.

Based on an analysis of four existing neighbourhoods within Port Hope and Cobourg, the NGMS report recommends a density of 30 persons and jobs per hectare. The intent of the reduced density is to ensure that the market for medium and high density developments can be directed to and accommodated in within the built up boundaries rather than to Greenfield areas.

The Province acknowledged from the outset that the density targets applicable to the inner ring are not directly applicable to communities within the outer ring. The Province has further recognised that the target set for the outer ring is also not applicable to all circumstances. The figure of 30 persons and jobs per hectare suggested by the NGMS may be more realistic for Brighton, but it is unclear just how such a figure may be achieved. There was some suggestion by the Province in 2005 that land extensive industry should be turned away from communities in favour of land intensive industries and activities which would further the goals of intensification.

³ *County of Northumberland and its Member Municipalities 2 Phase 1 (Components 3 and 4) and Phase 2 (Component 1) May 13, 2009 Options for Implementing the Growth Plan in the County of Northumberland, pp 44-45.*



- **It would seem that such an approach to economic development presents some serious problems for communities that are striving to attract employers and industry in the face of stiff competition from the GTA. On the other hand, it furthers the goal of the Province to shift “the distribution of growth from some GTA regions to allow for even higher levels of growth in Toronto and somewhat more growth for Hamilton and Durham Region.” (Hemson, 2005)**

5.0 MUNICIPALITY OF BRIGHTON POSITIONING

The Growth Plan for the Greater Golden Horseshoe has as a primary intent the restriction and management of future growth in population and employment so as to minimize the impact of suburban and low density sprawl. It seeks to promote compact and intensely developed communities within the boundaries of existing built up areas order to maximize the value of existing infrastructure and create new densities of development that use that infrastructure efficiently. It also seeks to limit the encroachment onto valuable natural heritage and agricultural land.

From a planning perspective, there is much to commend this strategy. There is undeniable value in attempting to rein in the costly patterns of sprawl that have typified new residential growth in Ontario since the Second World War. As a rule, residential, commercial and industrial densities should be high enough so as to maximize the use of existing urban infrastructure and minimize the costs associated with land-extensive low density development.

The impact of this strategy is that future development is to be focused on existing built up communities through restrictions on non-built up areas. This will create inevitable disparities in treatment among regions and municipalities in terms of their future growth opportunities and associated assessments, and their opportunities for new investment in infrastructure.

It means that most rural hamlet, village and small town communities will not receive the same relative level of growth opportunity as larger communities. It means that areas without existing and sufficient municipal water and sewer services or densely built communities will sacrifice their growth opportunities to other areas. It means that, over time, employment opportunities will be more readily available in some communities than in others. It means that, as government investment in new



infrastructure reinforces these same preferences, the permanency of the strategy and the disparities will be reinforced.

The Growth Plan is decidedly GTA-centric. Based on a substantial population and existing infrastructure already in place, it directs most population and growth to the GTA municipalities. In order to facilitate this focus, the pressure for restriction on new population and employment growth increases as one moves further from the GTA core. Northumberland County, as the easternmost County within the Growth Plan area, faces the greatest such pressure.

This status has been a central factor in the Municipality's evolving positioning. The central question is whether the provincial interests as set out in the Growth Plan require a more careful and sensitive balancing of regional circumstance and local impact.

The August 25, 2008 presentation to the Ontario Ministers of Municipal Affairs and Housing and the Minister of Energy and Infrastructure – **Brighton: Where the Past Greet the Future: A Rural Municipality's Sense of Place** – follows on the work of the Eastern Ontario Smart Growth Panel in 2003 and A Prosperity Plan for Eastern Ontario in 2007. The presentation calls for an improved recognition of the easterly-oriented rather than westerly-oriented relationships that impact on the economic well being of the municipality. It proposes a realignment of its status such that Brighton can be aligned with the Quinte Economic Region – an area encompassing Brighton, Quinte West, Belleville and the County of Prince Edward – and a future Growth Plan for Eastern Ontario, as well as the Growth Plan for the Greater Golden Horseshoe.

The case for this alignment is based on a variety of factors:

- The essential rural nature of Northumberland, making it a poor fit with an urban-oriented strategy;
- The easterly outbound employment alliance: while half of Brighton residents work in communities to the east, fewer than one in five work in communities to the west;
- The easterly inbound employment alliance: while 30 per cent of inbound Brighton workers are from eastern communities, only half as many are from western communities;
- The role of the Quinte Economic Development Commission as the driving force in Brighton's economic development activities;



- A \$1 Billion expansion of 8 Wing CFB Trenton to the east, the largest and busiest air force base in Canada, over the period 2007-2012, and a post-2012 expansion of training facilities for the Joint Task Force 2 Training Headquarters, involving some 600 personnel and families, which will impact on the residential population and development of Brighton;
- The historic and sustaining relationship of the people of Brighton to the easterly Quinte Health Care Trenton Memorial Hospital and its 70 beds and Emergency Services. Brighton has played an important role on the Quinte Health Care Board and the Brighton/Trenton Healthcare Advisory Committee, and in physician recruitment;
- The Provincial decision to align Brighton as part of the easterly-focused South-East Local Health Integration Network;
- The large draw of students from the East Northumberland Secondary School in Brighton to Loyalist College and its workforce training in Belleville to the east;
- The operations of Quinte Access, which operates a transportation service for persons with disabilities in Brighton, and in the easterly municipalities of Quinte West and the County of Prince Edward.

It is plain that many of the key indicators of alignment that impact on the prosperity of Brighton and the standard of service provided to its constituents are aligned to the east. In that regard, growth within the Municipality is influenced by its position relative to Quinte West as well as its traditional relationships with fellow municipalities in Northumberland and the GTA further to the west.

6.0 SUMMARY

Based our review of the Northumberland Growth Management Strategy, EcoVue has concluded that its basic assumptions do not reflect the realities of the Municipality of Brighton. We acknowledge that this is to be expected, in that the intent of the Growth Plan is to change the fundamental structure of growth and development within the Growth Plan area. The Plan intends to direct new development to larger, fully serviced urban centres to the west, through the combined use of rules/policies to control growth that may exceed forecast population/employment numbers.

1. The Growth Allocations do not represent reasonable or sustainable rates of growth for Northumberland or for Brighton. The Schedule 3 allocations of growth for Northumberland



overall and for each of the member municipalities are much lower than the actual growth experienced within the area during the first 5 years of the GPGGH.

2. The allocation of 16,000 persons to Northumberland represents 0.43% of the total growth allocation of 3.7 million persons for the Greater Golden Horseshoe, as a whole. The growth allocation translates into an increase of 640 persons or 300 households per year from 2001 to 2031. The GPGGH requirement for Northumberland to equitably distribute relative percentages of the GPGGH growth allocation to individual municipalities and then to plan for the implementation of such a miniscule growth allocation is simply absurd.
3. Based on historic growth rates, the alternative population scenarios (PTG+ and PTG++) included in the NGMS report more closely reflect the growth which is projected for the Municipality of Brighton. The PTG+ approximates the total growth which could be expected if future rates of growth are similar to the 5% per annum rate characteristic of the period from 1996 to 2006. The PTG++ closely mirrors the growth in population which has occurred in the municipality from 1966 through to 2006.
4. The 2011 review of the allocations for the GPGGH should reflect a growth allocation of 14,500 persons by 2031, a figure which is supported herein and is drawn from the Background Report for the Brighton Official Plan completed in 2008.
5. The NGMS report assumes that population percentages for each of the member municipalities are constant over time. This is a static approach, intended to result in a 'fair to all' model, which by its very nature, ignores local circumstances and opportunities. This is of particular concern to the Municipality of Brighton, which is influenced by its nearest neighbours to the east, rather than by the Durham region and the GTA.
6. The Plan assumes an 85/15% urban rural allocation of growth which is based solely on and interpretation of policy and does not reflect the realities of a municipality which is 50% urban and 50% rural and within which there appear to be nearly as many opportunities for construction of dwellings on existing lots of record in rural areas as there are in the settlement areas. An urban/rural allocation of 65/35 that reflects current realities, but at the same time moves the municipality towards further urbanization and greater utilization of existing underutilized infrastructure.



7. The basis on which the NGMS allocated growth to rural areas within municipalities is fundamentally flawed. The Report provides for growth within rural settlement areas in the municipality (Orland, Codrington, Hinton) of 65 persons between 2006 and 2031. This represents an increase of 2.6 persons per year for each of the next 25 years. This means of allocating rural growth must be reconsidered in light of its implications for the future of rural Ontario communities.
8. An increase in the designation of employment lands in Brighton is both appropriate and necessary and supported by the Municipality.
9. The GPGGH should reflect an intensification target in the range of 30 persons and jobs per hectare for Northumberland and its member municipalities.

6.1 RECOMMENDATIONS

It is recommended that:

1. The NGMS Report be received for information purposes.
2. The concerns raised herein be forwarded to the County of Northumberland Working Group and to the consultant.
3. Greenfield minimum densities of 30 persons and jobs per hectare.
4. That the Municipality of Brighton continue with the preparation of its new Official Plan on the basis that:
 - a. future growth within the Brighton urban area will be accommodated through the introduction of development phasing for lands designated for development,
 - b. the draft consent policies, which have been designed to limit rural lot creation, be included in the final draft of the Plan.
- That the Ministers of Energy and Infrastructure, and Municipal Affairs and Housing be asked to recognise the strong alliance which the Municipality of Brighton enjoys not only with its fellow member municipalities throughout Northumberland and the GTA to the west but also with the City of Quinte West to the east;



and further that future growth management scenarios for Brighton reflect, to the extent possible, the influences and pressure for growth arising from economic development in communities to the east.

Respectfully submitted,
ECOVUE CONSULTING SERVICES INC.

A handwritten signature in blue ink that reads "Heather Sadler". The signature is fluid and cursive.

Heather Sadler B.A. M.A. MCIP RPP
Senior Planner