

2021



Strathroy-Caradoc OFFICIAL PLAN REVIEW DRAFT POLICY CONFORMITY & DIRECTIONS REPORT NOVEMBER 2021



Prepared by



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1 Introduction

The Municipality of Strathroy-Caradoc (the “Municipality”) is undertaking its Official Plan Review (OPR), which has been branded as the “Growing Together Strathroy Caradoc” project. The OPR will culminate with an amendment to the Official Plan to serve as a road map for the Municipality to responsibly manage growth and change over the next 25+ years. Through Growing Together Strathroy-Caradoc, the Municipality will prepare a series of concurrent Master Plans and Studies and complete consultation with the community to inform updates to the Official Plan.

This Policy Conformity and Directions Report (the “Report”) is a critical component of the Official Plan Review and represents the culmination of background work and consultation to establish a roadmap to update the Official Plan. This Report considers matters that will inform the preparation of an Official Plan Amendment – which will formally introduce changes to the Official Plan, informed by legislative requirements, the County of Middlesex Official Plan Update, and best practices, among others.

1.1 Project Background

The Growing Together Strathroy-Caradoc initiative began in October 2020 with community engagement sessions to develop a community vision and start a conversation about land use planning in the Municipality. The Official Plan Review is one component of the Growing Together project and is being completed in phases throughout 2021. In 2022, the Municipality will launch its Municipal Comprehensive Review to evaluate and determine whether additional lands are needed to accommodate future growth, which could result in the expansion of the urban settlement areas of Strathroy and Mount Brydges, or in the conversion of areas currently designated for Employment to Residential designations. An Official Plan Amendment to implement the Official Plan Review and Municipal Comprehensive Review will be considered by Municipal Council in 2022, before which significant consultation with the community and stakeholders is planned.

To learn more about the Growing Together Strathroy-Caradoc initiative and find out how to get involved, visit growingtogethersc.ca

1.2 Purpose of this Report

This Report is the second major deliverable of Phase 2 of the Official Plan Review (**Figure 1**). Building on the Background Review and Gaps Analysis Report prepared in Spring/Summer 2021, this Report summarizes the recommendations stemming from the other Master Plans and Studies and proposes a series of policy directions to address the gaps, issues, and conflicts that have been previously identified.

To date, the Municipality has completed Phase 1 of the Official Plan Review to (re)designate three areas within the Strathroy Settlement Boundary. On Monday, September 20th, Council adopted Official Plan Amendment #13 to conclude Phase 1. The timing of Phase 2 and 3 is aligned with the concurrent Master Plans and Studies being prepared through the Growing Together Project. Section 2.5 of this Report outlines the various Master Plans and Studies that are being prepared as part of this initiative.

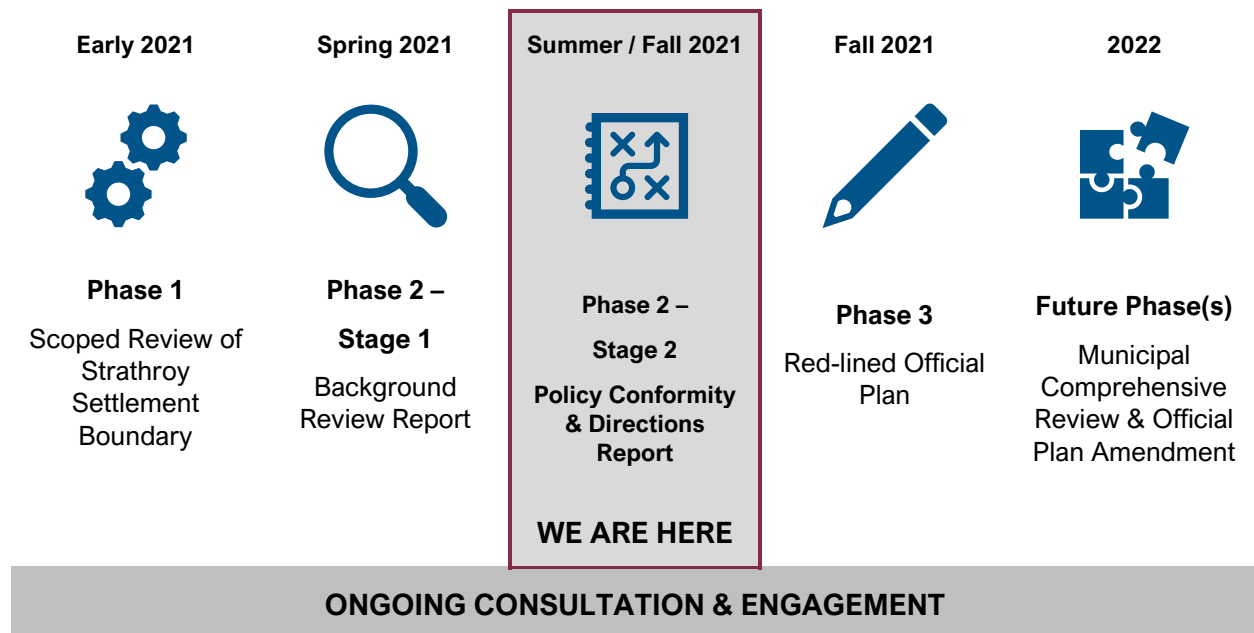


Figure 1 - Official Plan Review project process

2 Official Plan Review Engagement

To inform the development of this Policy Conformity and Directions Report, and as part of the larger Growing Together Strathroy-Caradoc project, several engagement milestones have been achieved to-date for the OPR. This section provides a summary of these key milestones which have focused on educating the public about the project and importance of the Official Plan, to seek input into the types of issues to be addressed and continue community conversations regarding the future of Strathroy-Caradoc.

In preparing this Report, a workshop was held with Municipal and County staff to understand detailed ways in which the Strathroy-Caradoc Official Plan needs to be updated. Input received from this workshop, as well as meetings with the Technical Advisory Committee and Stakeholder Advisory Committee, has been considered within this Report. Following the release of the Draft Policy Conformity and Directions Report, a public open house was held to present the document and seek input and comments.

2.1 Staff Workshop

On November 1, 2021, a workshop was held between County and Municipal staff from a wide range of departments, including planning, housing, transportation, community services, and engineering. The purpose of this workshop was to introduce preliminary policy directions, ensure a degree of coordination between the County and Municipality, and discuss further directions to be considered. The following is a summary of key comments and directions that have been considered through this Report:

- Review changes introduced in the County’s draft Official Plan policies;
- There is a need to consider policies for Additional Residential Units in new development areas and agricultural areas to avoid future severances;
- Policies should clarify the densities and help citizens understand buildings around them;
- There is a need for policies related to tiny homes;
- Arterial roads would be a significant focus for future mixed-used areas;
- Clarify if institutional uses will be permitted as part of mixed-use development;
- Provide direction for a future Climate Action Study in the Municipality;
- There are significant concerns and risks associated with communal servicing, especially considering the high level of municipal servicing in the Municipality;
- Encourage coordination with utility providers ahead of (instead of during) major road reconstruction;
- The pandemic has shifted the focus to parks and outdoor spaces;
- The Municipality already implements a scoped site plan process for secondary farm occupations (on-farm diversified uses); and,

- There is a need to introduce a policy framework for a Rural Residential zone (together with the Agriculture Consolidation zone) to limit farm uses following a severance.

2.2 Stakeholder Advisory Committee

On November 3, 2021, a third meeting was held with Stakeholder Advisory Committee to present the preliminary policy directions and seek feedback prior to public consultation. The Stakeholder Advisory Committee presented several important considerations to the project team, which have been considered through this Report:

- There is a need to consider the unique functions and character of Strathroy and Mount Brydges;
- Consider criteria, such as directing the zoning by-law to establish minimum lot coverage requirements, for additional residential units;
- There is an opportunity to consider policies which support tree planting and the protection of the tree canopy;
- There is need to consider affordable housing options for the farming community;
- The Municipality should engage community groups and organizations in the planning process to allow them to relay information; and,
- There is a need to coordinate road re-construction with infrastructure upgrades.

2.3 Technical Advisory Committee

On November 3, 2021, a third meeting was held with the Technical Advisory Committee to present the preliminary policy directions and seek feedback prior to public consultation. The Technical Advisory Committee members shared their perspectives on various technical matters, which have been considered through this Report:

- There is a need to consider amenities and services that are available alongside future affordable housing developments;
- In planning for neighbourhoods, including schools within a “Neighbourhood” land use designation helps streamline the development process for school boards;
- In planning for infrastructure and broadband, encourage broadband utility works to be completed prior to main road construction to avoid delays;
- There is a need to establish criteria to ensure that on-farm diversified uses remain small-scale and to engage the agricultural community to understand their desires, concerns, and perspectives; and,
- There is an opportunity to proactively engage with the Conservation Authorities to confirm the approach to the Natural Heritage System.

2.4 Public Open House

Note to Draft: To be populated based on the Public Open House which be held to seek input on the Draft Policy Directions Report in November 2021.



3 Key Issues

This section summarizes the key issues that have been identified through the Background Report, as well as consultation with Municipal staff & Council, the community, and stakeholders. Section 3 provides a summary of the broad issues to be addressed and the policy context which will guide appropriate resolution(s) to the issue. Section 4 builds on this summary and outlines policy directions and changes for the various sections of the Official Plan to address these issues.

3.1 Complete Communities & Vibrant Main Streets

Complete communities are described as mixed-use neighbourhoods or spaces that support people of all ages and abilities to fulfill their daily needs through an accessible mix of employment, housing types, public services, transportation options and retail.

Complete communities are seen as a best practice in the planning practice due to their high livability and ability to support residents in all stages of life. Attainable housing, accessible transportation options, diverse mix of stores and services, as well as recreation opportunities are all important aspects of complete communities. Complete communities ensure that each of these elements are easily accessible to all community members.

Planning for complete communities includes adding density and housing options to the community. In the Official Plan, there is an opportunity to promote higher density forms of housing (e.g., townhouses, mid-rise apartment buildings). Introducing a framework for additional residential units, sometimes referred to as second suites will contribute to building density and attainable housing essential in complete communities. Increasing density and diversity of housing options is in accordance with the changes in the *Planning Act* and Provincial Policy Statement. Planning for complete communities also includes the prioritization of accessible transportation options and ensuring there are adequate parks and recreation opportunities for all residents.

A related concept to complete communities is vibrant main streets. Attractive, well-designed streetscapes add to the public realm and invite residents as well as attract visitors to spend time enjoying the small businesses and public space present in the Municipality's main streets. The streetscape contributes to the urban environment and can add to the livability of the community. Vibrant main streets may include the use of coordinated street furniture, sidewalk plantings and street trees, adequate bicycle parking, and accessible seating. Achieving vibrant main streets will enhance the pedestrian experience of Strathroy-Caradoc. Main streets can be seen as the core for communities like Strathroy-Caradoc and increasing the vibrancy of the main streets can benefit small businesses and community members.

Planning for vibrant main streets includes protecting employment lands, incorporating strong urban design guidelines, and designing complete streets that accommodate all road users. There may be an opportunity to revise the permitted uses and form of development policies to better reflect current trends in retail, support local economic development, and job creation.

Continuing to support the implementation of the Downtown Master Plan will aid in the work towards a vibrant core area.

3.2 Natural Heritage & Hazards

Natural heritage is an essential part of the Strathroy-Caradoc community. Strathroy-Caradoc is made up of 19.7% significant natural heritage (Middlesex Natural Heritage Systems Study, 2014). The natural heritage areas in Strathroy-Caradoc are composed of the following features: significant woodlands and wetlands, wildlife habitats (including endangered and threatened species habitats), aquatic ecosystems including fish habitats, river, stream, ravine and upland corridors, aggregate resource areas, petroleum resource pool areas, and areas of natural & scientific interest. The natural heritage system in Strathroy-Caradoc is largely made up of significant woodlands.

The 2020 Provincial Policy Statement (PPS) (Section 2.1) highlights the importance of preserving natural heritage features and when possible, improving the diversity and connectivity. The responsible management of natural heritage is essential in ensuring that residents can enjoy the social, environmental, health and economic benefits of the features for years to come. Findings of the Middlesex Natural Heritage Systems Study will be incorporated in the Official Plan to protect significant features such as wetlands and woodlands.

Natural hazard lands include steep slopes, unstable soils and fill regulated areas. Within Natural hazards, development is not prohibited, and there is a need to protect these features from incompatible land uses in the Official Plan. There is also a need to consider the impacts of a changing climate on the extent and severity of natural hazards, such as floodplains. Strathroy-Caradoc's natural heritage system is also important for stormwater management and climate change adaptation. Planning for natural heritage and hazards means including policies in the Official Plan that support a reduction in greenhouse gas emissions and adaptation to climate change.

Within the Official Plan, it is important that source water protection policies are reviewed as there are currently no municipal drinking water sources in Strathroy-Caradoc that are regulated by a Source Protection Plan. The Lake Huron Primary Intake, which services Strathroy-Caradoc, is not regulated by a Source Protection Plan. Provincial policies regarding protection of drinking water sources have evolved and the Official Plan should include policies that align Strathroy-Caradoc with the Province and protect source waters.

In addition to this, the Official Plan will balance agricultural and natural heritage within its policies and provisions. The Official Plan can clarify that existing agricultural uses are permitted to continue within or adjacent to natural areas and natural hazards.

3.3 Transportation & Infrastructure

Planning for transportation and infrastructure is a major aspect of an Official Plan. Transportation encompasses all forms of mobility: automobiles, public transit, bicycles, wheelchair users, and

pedestrians. Infrastructure includes the physical systems that provide municipal services such as stormwater management, water and sewer systems, roads and mobility technologies.

For Strathroy-Caradoc, it is important to plan for transportation and infrastructure that accommodates growth. There is a need to review and update the Municipality's road network and associated policies for the new planning horizon. This means implementing policies that encourage sustainable forms of transit when possible. Further, policies that promote active transportation (i.e., walking, rolling, and biking) in both urban and rural areas will be beneficial in achieving a healthy and complete community. Part of this work is designing for complete streets, which can accommodate transportation users of all ages, ability, and mode of travel. Traffic calming and providing direction for the construction of new communities is also a resource in ensuring all road users can safely and effectively share the road.

Planning for transportation and infrastructure includes creating policies and guidelines within the Official Plan for electric mobility. For example, including provisions for electric vehicle charging stations within the Municipality. In addition to this, the Official Plan will support the development of infrastructure using municipal water and sewer systems. It will encourage sustainable stormwater management and incorporate policy considerations related to broadband and mobility technologies. An emerging gap from the COVID-19 pandemic has been broadband access; the Official Plan can encourage the development of broadband services in rural areas of the Municipality.

3.4 Supporting Agriculture

In Strathroy-Caradoc, it is important to balance agricultural areas with the natural heritage system. Agriculture is a key part of Strathroy's identity and serves both the immediate and broader community. The PPS protects prime agricultural lands while allowing for additional land uses when appropriate to support the success of farms.

The Official Plan will support agricultural practices and encourage innovative uses to support on-farm diversification. Since the last Official Plan (2015), the Province has published two sets of guidelines to assist municipalities in implementing the agricultural policies of the Provincial Policy Statement: the Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas and the Minimum Distance Separation Formulae Document. This Official Plan Review presents an opportunity to review the current Provincial policies and guidelines for agricultural areas and identify areas for updates to the City's Official Plan.

Planning for supporting agriculture will include policies for new lot creation and surplus farms in prime agricultural areas. The Official Plan can provide greater direction and clarity regarding how applications for surplus farm residence severances should be evaluated. It will also include support for on-farm diversified uses. On-Farm Diversified Uses are defined as, "uses that are secondary to the principal agricultural use of the property and are limited in area. On-farm diversified uses include, but are not limited to, home occupations, home industries, agri-tourism uses, and uses that produce value-added agricultural products." The Official Plan will include an

updated understanding of diversified uses and can outline the specific types to be permitted. The Official Plan will also include policies for agriculture-related industrial and commercial uses.

3.5 The Nuts & Bolts (Implementation Tools)

To realize the goals and objectives identified in the Official Plans policies, the Municipality has several planning tools at its disposal. These tools are used to ensure that both privately led and Municipality-led development or redevelopment in Strathroy-Caradoc implements the policies of the Official Plan. These tools may include:

- Official Plan Amendments (landowner or Municipally led)
- Strathroy-Caradoc's Zoning By-law
- Plans of Subdivision and/or Condominium
- Site Plan Control
- Consents, minor variance, and lot creation requirements
- Use of holding symbols in zoning
- Temporary-use and interim control by-laws

The current implementation policies of the Official Plan require development review to ensure that the input of the community is sought on all planning matters that are in the public interest. A more robust section on public consultation can be added, that implements recent *Planning Act* amendments to enhance citizen participation and considers the significant shift in the way that municipalities engage with residents that has taken place since the onset of the COVID-19 pandemic. There is an opportunity to build on the traditional consultation model of in-person public meetings and include policies in the Official Plan that encourage a variety of engagement techniques, especially those that leverage social media and remote connection. Moreover, policies on public consultation can be placed above the implementation tool policies to illustrate that input from the community should be central in the planning process.

There is also an opportunity to include new policies related to consultation with Indigenous communities. These policies should reference the need to confirm the preferred level of consultation from specific communities, and that the consultation process is to be undertaken in a different manner than stakeholders or residents of the Municipality. Consideration should be had to ensure this goal applies to participation in environmental management and consultation, cultural heritage resources, and development application review. In particular, in accordance with Call to Action 92 of the Truth and Reconciliation Commission of Canada, any development project that has the potential to affect the lands or water sources of a neighbouring Indigenous community should receive the free, prior, and informed consent of that community.

In order to increase transparency, an important part of the OPR process will be improving the readability of the Official Plan and refreshing the glossary of defined terms. Similarly, the Official Plan will consider the use of policies requiring pre-submission consultation for development applications to improve the experience of residents and Municipal staff.

4 Growing Together Strategic Policy Recommendations

The Official Plan Review is being prepared as part of the Growing Together Strathroy-Caradoc project, which includes a series of eight different Master Plans and Studies, including the:

1. Parks and Recreation Plan (PRMP)
2. Transportation Master Plan (TMP)
3. Recreational Trails Master Plan (RTMP)
4. Employment Lands Study (ELS)
5. Attainable Housing Study (AHS)
6. Regional Commercial Systems Study (RCS)
7. Servicing Capacity and Constraint Study
8. Fire Station Location Study

How will they be considered in the Official Plan Review?

The Master Plans and Studies are closely linked to the preparation of this Policy Conformity and Direction Report. An initial overview of each Master Plan and Study is included within this document to understand the potential considerations and implications of each. It is anticipated that the Master Plans and Studies will be completed in draft alongside the development of the Policy Conformity and Directions Report. The Policy Conformity and Directions Report will translate the recommendations of the Growing Together project into specific policy directions and consideration for the OPR.

Official Plan Strategic Directions

The Parks & Recreation Master Plan establishes:

- A parks and recreation vision and guiding principles
- An updated parks and open space hierarchy
- Locations for future community services and facilities
- Policies to support the implementation of this functional servicing master plan, such as parkland dedication

Strategic Policy Recommendations

1. Consider PRMP guiding principles within overall Official Plan objectives (OP section 2.5)
2. Establish a single policy regime for Community Facilities and Parks / Open Space that applies across entire Municipality
3. Ensure alignment with current *Planning Act* and recent changes via Bill 197 (parkland)



4. Consider introduction of alternate parkland dedication rate (1ha:300 units if land or 1ha:500 units if cash) and use of community benefits (Section 37)
5. Ensure that OP is consistent with Parkland Dedication By-law (e.g., valuation under S.42)
6. Reflect and/or reference PRMP parkland classification system and per capita targets

The Transportation Master Plan establishes:

- A transportation vision and guiding principles
- Updated transportation network mapping
- Policy considerations to support the implementation of this functional servicing master plan, such as guidance for the development of new communities and updated right-of-way classifications



Strategic Policy Recommendations

1. Introduce Complete Streets policies to promote equal consideration to multiple transportation mode users in order to provide a balanced and inclusive transportation network.
2. Update road classification system to align with a Complete Street lens as outlined in the TMP vision statement, and harmonize road classifications across Strathroy, Mount Brydges, and the rural communities.
3. Include policies encouraging consideration for Low impact development (LID) measures for stormwater management on Municipal roads.
4. Introduce standards and policies requiring new developments to provide sidewalks on both side of the street in urban conditions and cycling facilities along collectors and arterial roads.
5. Establish a traffic calming policy to allow for a range of programs or measures to reduce the risk to non-motorized road users.
6. Update or introduce railway crossing policies to consider standards and measures that minimize road-rail conflict wherever possible.
7. Introduce policies encouraging implementation of electric mobility in various forms, including through micro-mobility (e.g., e-scooters or e-bikes), investment in electric vehicle (EVs) charging infrastructure, and commercial electrification (e.g., EV fleets).





The Recreational Trails Master Plan establishes:

- A trails vision and guiding principles
- Updated trails network mapping
- Policy considerations to support the implementation of this functional servicing master plan, such as principles for planning, constructing, and maintaining trails

Strategic Policy Recommendations (Pending)

The Employment Lands Study establishes:



- Whether sufficient employment lands are designated and in the most appropriate location in order to secure and protect a range of employment opportunities across the Municipality
- Employment land conversion policies
- A hierarchy of employment lands

Strategic Policy Recommendations

1. Continue to plan for future urban employment lands development within the Municipality of Strathroy-Caradoc.
2. Ensure that employment area lands are well adapted to structural changes occurring in the evolving macro economy.
3. Restrict major retail uses in urban employment areas.
4. Provide stronger direction regarding employment-supportive uses in urban employment areas.
5. Explore opportunities for intensification of employment lands within urban settlement areas.
6. Plan for an urban employment area density target of 13 jobs/net hectare and monitor density.
7. Continue to promote the Municipality's employment areas and identify opportunities for further municipal involvement in the development of employment areas.
8. Establish Official Plan policies to protect urban employment areas, including an employment area conversion framework.
9. Undertake regular and ongoing monitoring of urban employment area land supply and demand to assist with longer-term land-use planning and land needs.



The Attainable Housing Study establishes:

- Policies to address the need for more diverse housing options such as smaller dwellings and affordable family-sized dwellings
- Policies to increase the supply of purpose-built rental housing
- Policies to develop more attainable ownership options
- Policies which respond to shifting housing preferences due to the COVID-19 pandemic

Strategic Policy Recommendations

1. Consider adding a definition of affordable housing and/or attainable housing in the Municipality's Official Plan based on the definition in the PPS and the definition in the County Official Plan.
2. Update Official Plan policy 2.4.3 to state that the municipality will maintain a 15-year supply of undeveloped and underutilized lands designated and zoned for residential purposes.
3. Building on the previous recommendation, consider prioritizing affordable housing when considering the sale or lease of surplus municipal properties.
4. Revise Official Plan policy 2.4.4 to state that the Municipality encourages and supports the development of a full range and mix of housing types, including the housing options identified in the Provincial Policy Statement 2020, throughout the Municipality.
5. Building on the previous recommendation, revise the Official Plan to expand on the dwelling types categorized as low, medium and high density and update the Zoning By-law to ensure it aligns with the Official Plan.
6. Building on the previous recommendation as well as the Community Improvement Plan (CIP), consider adding an Official Plan policy that states the Municipality may provide financial and non-financial incentives to support the development of affordable/attainable housing.
7. Add an Official Plan policy to permit special needs housing in all areas where dwellings are permitted, subject to the availability of infrastructure.
8. Consider introducing a new term to the Official Plan and Zoning By-law which refers to housing where individuals share accommodation either for economic, support, long term care, security, or lifestyle reasons and supports may or may not be included in the housing continuum.
9. Revise Official Plan policy 3.3.4.10 and the Zoning By-law to remove any minimum separation distance requirements



between two group homes to ensure these policies are consistent with the Ontario Human Rights Code.

10. Building on Official Plan policies 2.4.5 and 2.4.6, consider encouraging a certain proportion of all new dwellings in large scale developments (to be defined), particularly in Mount Brydges (policy 4.3.1.7), and in other appropriate areas throughout the Municipality, be in a form other than single- and semi-detached.
11. Consider adding a rental housing target of at least 25% of all new dwellings be rental housing to increase the supply of purpose-built rental housing throughout the Municipality.
12. Consider developing and implementing a rental conversion and demolition policy which would require replacement of all rental units which are converted to other tenures or demolished to protect the supply of rental housing in the Municipality.
13. Building on Official Plan policy 2.4.7, consider developing and implementing a property standards by-law to ensure rental housing units meet all health and safety standards and are maintained in good condition.
14. Consider developing and implementing urban design guidelines which build on existing guidelines for some Secondary Plans that will ensure any medium density dwellings built in areas primarily characterized by single unit dwellings will be consistent with the character of the existing neighbourhood.
15. Consider updating the Official Plan and Zoning By-law to encourage medium density dwellings in serviced Settlement Areas, including areas which are predominantly characterized by single unit dwellings, provided they conform to urban design guidelines and maintain the residential character of the neighbourhood.
16. Building on the previous recommendations and on Official Plan policy 3.3.4.8, consider permitting the conversion of existing single unit dwellings or the development of new multiple unit dwellings in areas predominantly characterized by single unit dwellings on the condition that they maintain the residential character of the neighbourhood.
17. Update Official Plan policies 3.3.4.7 and 4.3.1.4.1 to allow for two additional dwelling units or secondary dwelling units (for a total of three dwellings on one lot) in appropriate locations to conform to recent Provincial legislation.
18. Building on Official Plan policy 4.3.1.6, ensure there are no barriers to innovative housing forms and construction methods in either the Official Plan or Zoning By-law for all areas of the Municipality.



The Regional Commercial Systems Study establishes:

- Whether the designated commercial lands (e.g., shopping areas) are sufficient to meet the current and anticipated market needs
- Address emerging commercial trends such as online shopping and pandemic implications
- Policies to support the vibrancy of Strathroy-Caradoc's main streets

Strategic Policy Recommendations

1. Allow commercial areas to evolve into mixed-use sites while protecting commercial space for the long-term.
2. Ensure that Mount Brydges can accommodate commercial demand given the sufficient supply of commercial land to 2046.
3. Consider removing the minimum size threshold for free-standing retail outlets and the number of retail outlets in areas designated commercial in the south end of Strathroy.
4. Protect and direct commercial development in the established commercial nodes and corridors.
5. Protect and enhance the function of the downtown core of Strathroy.
6. Undertake regular and ongoing monitoring of commercial area land supply and demand.



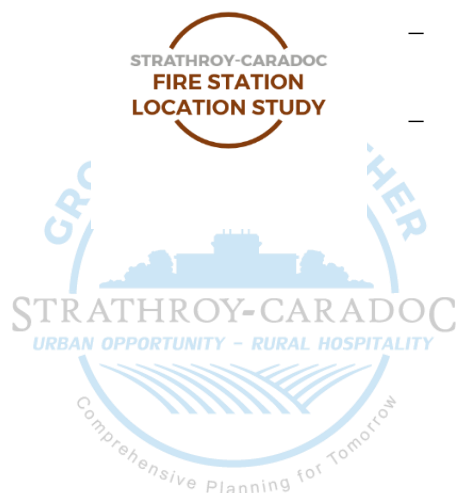
The Servicing Capacity & Constraint Study establishes:

- Servicing needs for areas that are growing and major issues affecting the community in terms of water, wastewater, and stormwater systems
- Providing recommendations to address these servicing needs to support economic growth and protect public health and the environment

Strategic Policy Recommendations (Pending)

The Fire Station Location Study establishes:

- The optimal location(s) for fire stations and alternative locations including the possible construction of a third fire sub-station
- It is noted that the Fire Station Location Study has minimal implications for the Municipality's Official Plan; rather, it is using inputs from the various planning initiatives to make recommendations (e.g., population forecasts)



5 Policy & Official Plan Directions

The purpose of Section 6 is to provide a detailed overview of how the key issues and strategic recommendations discussed in Sections 3-5 may be addressed through the Official Plan Review. The table in Section 6 builds on the Background Report by adding a ‘policy’ directions column to the table presented in that report. The preliminary policy directions will be refined through subsequent consultation and will inform the red-lined Official Plan in the next stage of work. The red-lined Official Plan may also include other minor or contextual changes not identified within Section 6.

5.1 Policy Directions

Table 1 characterizes the existing policy of the Strathroy-Caradoc Official Plan, identifies the key issue, conflict or gap, summarizes the key policy and legislative drivers and resources to address this issue, conflict, or gap, and lastly provides policy directions. The policy directions identified through this process will be subject to further consultation with the County and Conservation Authorities. The table is organized by chapter of the Municipality’s current Official Plan.

For convenience purposes, the following is a list of acronyms used in **Table 1**:

- PPS: means the Provincial Policy Statement, 2020
- SCOP: means the Strathroy-Caradoc Official Plan
- County OP: means the County of Middlesex Official Plan
- MNHSS: means the Middlesex Natural Heritage Systems Study, 2014

Thematic Areas

- Pandemic Recovery
- Natural Environment & Climate Change
- Complete Communities
- Infrastructure
- Agriculture
- Housing
- Growth Management & Provincial Conformity
- General



Table 1 - Policy Issues, Conflicts, and Opportunities Assessment

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
Chapter 1: Introduction				Chapter 1: Introduction
The OP contemplates growth up to the year 2034 (Sections 1.4 and 1.5).	There is a need to plan for forecasted population and employment growth to the year 2046. Section 1.4 should be updated with the latest figures, and also include the Municipality's employment forecasts.	<ul style="list-style-type: none"> The PPS requires municipalities to plan for a 25-year planning horizon to the year 2046. Population and Employment Forecasts approved by Municipal Council. The County's MCR will plan for growth to the year 2046. The PPS now permits settlement area adjustments outside of a Comprehensive Review. The Official Plan should address this with policy that provides criteria for the acceptance of such proposals. 	Growth Management & Provincial Conformity	<ul style="list-style-type: none"> The planning horizon will be updated to reflect the 2021-2046 planning horizon established in the Council approved population and housing forecasts (Section 1.5). No changes are proposed to the Municipality's settlement hierarchy (Section 1.5). It is recommended that Section 1.5 be clarified to provide clear direction related to settlement area boundary expansions and adjustments, in accordance with the PPS. Consideration should be had related to policies to clarify how the Municipality will address settlement area expansion requests in accordance with Section 1.1.3.8 of the PPS. It is recommended that Section 2.2 be consolidated into Section 1.5 as a new sub-section related to agriculture.
The Introduction provides context into the Municipality and the development of the SCOP.	The introductory statement, as well as Sections 1.1 and 1.2, contain some outdated references / dates and should be reviewed and updated in line with consultation completed throughout the Growing Together project.	<ul style="list-style-type: none"> Various inputs, including public consultation and visioning, and the Strathroy-Caradoc Strategic Plan. 	General	<ul style="list-style-type: none"> The preamble section will be revised to reflect current statistics (e.g., population) and against the Municipality's Strategic Plan. The last paragraph of the preamble section will need to be revised to correct outdated references. Reference should be made to the comprehensive nature of the Growing Together project within Section 1.1, namely the coordinated and comprehensive nature of planning. The assumptions in Section 1.2 should be reviewed against the outcomes of the Studies. For example, reference should be made to on-farm diversification and promoting infill. Minor edits to Section 1.3 may be required to reflect the contextual nature of the Municipality and Growing Together project. This section can also contain a Territorial Acknowledgement.
Section 1.3 establishes the goals and objectives which serve as the basis for the SCOP.	The planning objectives and strategies should be updated to be reflect the PPS, 2020 and the County Official Plan, as well as to reflect other changes to the OP as recommended below. This should	<ul style="list-style-type: none"> Changes to the PPS have introduced new concepts and policies which relate the following themes: 	General	<ul style="list-style-type: none"> The goals and objectives will be revised to reflect the key policy & legislative drivers and resources.

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
	include references to climate change, green infrastructure, the Growing Together Master Plan & Studies recommendations, consultation with Indigenous communities, economic diversification and other issues.	<ul style="list-style-type: none"> Explicit consideration and planning for the impacts of climate change (3.1.3) Promotion of green infrastructure (1.6) Better integration of the interests of Aboriginal people and communities, such as protection of cultural and archaeological interests and improved engagement practices (2.6.4 – 2.6.5) New requirements for prime agricultural areas and further diversification of agricultural areas (2.3.3) 		
Section 1.7 lists the various matters of Provincial interest under the <i>Planning Act</i>.	Ensure the policy aligns with recent updates to the <i>Planning Act</i> . Consideration may also be had to remove the exact language from the <i>Planning Act</i> to ensure the SCOP remains current as the <i>Planning Act</i> is amended from time to time.	– The <i>Planning Act</i> lists the various matters of provincial interest.	General	<ul style="list-style-type: none"> The list of matters of provincial interests will be removed from the SCOP, and wording will be added to Section 1.7 to explain the matters of provincial interest & refer back to the <i>Planning Act</i>. The role of the SCOP under the <i>Planning Act</i> should also be clarified (e.g., the <i>Planning Act</i> establishes the hierarchy in which planning must be addressed within the Province and provides authority to apply planning policies and use enabled tools at both provincial and municipal levels).
Chapter 2: General Planning Directions				
Section 2.1 establishes policies for ‘Industry’. Policy 2.1.5 states that the Municipality shall protect industrial areas and industries from encroachment of unwanted land uses.	This section should be reviewed against the recommendations of the Employment Lands Study.	<ul style="list-style-type: none"> Section 1.3.2.1 of the PPS directs that municipalities plan for, preserve, and protect employment areas and ensure that the necessary infrastructure for their operation is provided Section 1.3.2.6 directs that municipalities should specifically protect employment areas in close proximity to major goods corridors (e.g., 400-series highways) The Employment Lands Study provides guidance to update SCOP policies related to employment lands (industry). 	Complete Communities	<ul style="list-style-type: none"> Section 2.1 should be reworked to establish clear policies that stress the importance of protecting Employment Areas, especially those that have full municipal servicing (water/wastewater servicing) and those in proximity to major goods movement facilities and corridors for employment uses requiring those locations It is recommended to base employment planning in Strathroy-Caradoc on a target density of 13 jobs per net hectare on developed urban employment lands. Add as an objective or principle the accommodation of knowledge-based sectors in addition to traditional industrial sectors in the Municipality’s industrial/employment areas.

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
		<ul style="list-style-type: none"> – Employment Lands Study Recommendations: <ul style="list-style-type: none"> ○ #2 recommends ensuring that employment area lands are well adapted to structural changes occurring in the evolving macro economy, namely deindustrialization and a pivot to a knowledge-based economy. ○ #5 recommends exploring opportunities for intensification of employment lands within urban settlement areas. ○ #6 recommends planning for an urban employment area density target of 13 jobs/net hectare and monitor density. ○ #7 recommends continuing to promote the Municipality's employment areas and identify opportunities for further municipal involvement in the development of employment areas. ○ #8 recommends establishing Official Plan policies to protect urban employment areas, including an employment area conversion framework. 		<ul style="list-style-type: none"> – Add as an objective or principle the promotion and encouragement of the development of start-up industries, particularly related to knowledge-based sectors and other export-based emerging industry clusters. – A policy could be added to this section promote the intensification of existing Urban Employment Areas through infill or redevelopment (including vacant or underused brownfield sites), and how such intensification could be facilitated.
<p>Section 2.3 establishes policies for 'Commerce'.</p>	<p>This section should be reviewed against the recommendations of the Regional Commercial Systems Study.</p> <p>There is also an opportunity to strengthen commercial land use policies to ensure that commercial uses remain as the principal use on a lot.</p>	<ul style="list-style-type: none"> – The Regional Commercial Systems Study provides guidance to update SCOP policies related to commercial lands and retail uses. – Regional Commercial Systems Study Recommendations: <ul style="list-style-type: none"> ○ #1: Allow commercial areas to evolve into mixed-use sites while protecting commercial space for the long-term. 	Complete Communities	<ul style="list-style-type: none"> – Section 2.3.1 will be expanded to articulate the vision laid out in the Regional Commercial Systems Study and include recommendations #1, #4, and #5 as goals/objectives – It is recommended to include a policy in this section directing that commercial development in residential areas should include small-scale commercial uses that have a minimal impact on the function of the commercial structure. – It is recommended to include a specific policy committing the Municipality to protecting designated existing and vacant designated commercial lands in Mount Brydges.

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
		<ul style="list-style-type: none"> ○ #2: Ensure that Mount Brydges can accommodate commercial demand given the sufficient supply of commercial land to 2046. ○ #4: Protect and direct commercial development in the established commercial nodes and corridors. ○ #5: Protect and enhance the function of the downtown core of Strathroy. 		<ul style="list-style-type: none"> – This policy can note that it is possible to achieve the commercial demand forecast for Mount Brydges on less land based on higher utilization of the land (i.e., building coverage and employment density).
<p>Section 2.4 establishes policies for ‘Housing’.</p> <p>Section 2.4.8 speaks to the preparation of a housing strategy.</p> <p>Section 2.4.2 speaks to maintaining housing stock, including the ability to establish housing targets.</p>	<p>This section should be reviewed against the recommendations of the Attainable Housing Study, including the vision and guiding principles for housing.</p>	<ul style="list-style-type: none"> – The Attainable Housing Study will establish a vision and series of guiding principles to inform updates to the SCOP. It will also establish other policy recommendations to support the provision of housing. – Attainable Housing Study Recommendations: <ul style="list-style-type: none"> ○ #3: Recommends developing an inventory of surplus municipal land and buildings that may be appropriate for affordable housing within Section 2.4.2. ○ #4: Recommends prioritizing affordable housing when considering the sale or lease of surplus Municipal properties. ○ #10: Recommends including a policy which encourages a proportion of all new dwellings in large scale developments be in a form other than single and semi-detached housing. ○ #11: Recommends adding a housing target of at least 25% of all new dwellings be rental housing to increase the supply of 	Housing	<ul style="list-style-type: none"> – Section 2.4.1 will be updated to include the Housing Vision established in the Attainable Housing Study. The objectives should be updated to include references to the provision of attainable or affordable housing. – Section 2.4.2 will be updated to reference that the Municipality will develop an inventory of surplus municipal land and buildings that may be appropriate for affordable housing. Wording will also be added to prioritize affordable housing when considering the sale or lease of surplus Municipal properties. – Section 2.4.8 will be updated to reflect the completion of the Attainable Housing Study. – A new policy will be added which requires a proportion of housing in large scale developments within Strathroy and Mount Brydges to be in a form other than single and semi-detached units. <ul style="list-style-type: none"> ○ It is recommended that Section 4.3.1.7 be moved to Section 2.4 of the SCOP to consolidate housing policies within the SCOP. – A new policy will be added that in accordance with the Municipality’s Attainable Housing Study the Municipality will set a target that 25% of all new residential units be rental housing within Section 2.4.2. <ul style="list-style-type: none"> ○ Note: The implementation of this policy direction will require consultation with Municipal staff – A new policy will be added that states that the conversion of existing rental housing to condominium or other forms of

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
		<ul style="list-style-type: none"> purpose-built rental housing throughout the Municipality. #12: Consider developing and implementing a rental conversion and demolition policy which would require replacement of all rental units which are converted to other tenures or demolished to protect the supply of rental housing in the Municipality. 		ownership is discouraged to maintain (and grow, through new development) an adequate rental housing supply.
Section 2.4.3 speaks to maintaining a 10-year supply of residential land.	There is a need to plan for a 15-year residential land supply.	<ul style="list-style-type: none"> The PPS now requires the Municipality to plan to accommodate residential growth for a minimum of 15 years (Policy 1.4.1). Attainable Housing Study Recommendation #2 recommends revising this policy to state that the Municipality will maintain a 15-year supply of undeveloped and underutilized lands designated and zoned for residential purposes. 	Growth Management Housing	<ul style="list-style-type: none"> This policy will be updated to reflect the PPS requirement to maintain a 15-year supply of designated residential land, instead of the current 10-year target.
Section 2.4.4 establishes policies related to housing for special needs.		<ul style="list-style-type: none"> Attainable Housing Study Recommendation #7 suggests adding policy to permit special needs housing in all areas where dwellings are permitted, subject to the availability of infrastructure. Attainable Housing Study Recommendation #8 suggests introducing a new term to the Official Plan and Zoning By-law which refers to housing where individuals share accommodation either for economic, support, long term care, security, or lifestyle reasons and supports may or may not be included in the housing continuum. Policy 1.4.3.b) of the PPS requires municipalities to permit and facilitate all housing options to meet the needs of residents, including special needs requirements. The term 'special needs' is defined within the PPS. 	Housing	<ul style="list-style-type: none"> A definition will be added for the term Special Needs Housing. Policy will be added to permit shared housing in all areas where dwellings are permitted by the SCOP, subject to the policies of the respective land use designation(s). Consideration could be given to adding policies generally encouraging and supporting shared housing, including specifying shared housing types (e.g., special needs housing, group homes, housing shared by unrelated seniors).

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
Section 2.5 establishes policies for ‘Parks and Recreation’.	This section should be reviewed against the recommendations of the Parks and Recreation Master Plan, including the vision and guiding principles.	<ul style="list-style-type: none"> The Parks and Recreation Master Plan establishes a vision and series of guiding principles to inform updates to the SCOP. It also establishes other policy recommendations to support the provision of parks and recreation, such as new services and amenities. 	Complete Communities	<ul style="list-style-type: none"> The Parks and Recreation Master Plan vision and guiding principles will be integrated into this section.
Section 2.6.3 speaks to urban design principles within the settlements. Section 2.6.5 speaks to the preparation of urban design guidelines.	There may be an opportunity to review these principles to ensure they reflect the current vision(s) for the settlement area, and address matters such as intensification and infill.	<ul style="list-style-type: none"> The Downtown Strathroy Urban Design Guidelines may provide a basis from which to update this section. Attainable Housing Study Recommendation #14 recommends that the Municipality develop and implement urban design guidelines which guide the development of medium density dwellings (and other forms of infill development) within existing neighbourhoods. 	Complete Communities	<ul style="list-style-type: none"> Sections 2.6.3 and 2.6.5 can be updated to reflect the need for urban design guidance for infill development within existing neighbourhoods. There is an opportunity to make other minor edits to section 2.6 related to sustainability, climate change, and energy conservation.
New policy opportunity.	The SCOP does not currently make reference to climate change, and limited references to sustainability.	<ul style="list-style-type: none"> Section 2 of the <i>Planning Act</i> includes the conservation of energy as a provincial interest. Section 1.7.1 of the PPS states the need to promote energy conservation and providing opportunities for increased energy supply as important to long-term economic prosperity. Section 1.8.1 of the PPS requires that municipalities prepare for and minimize the negative impacts to air quality and climate change and that planning authorities should maximize vegetation within settlement areas, where feasible. 	Natural Environment & Climate Change	<ul style="list-style-type: none"> The SCOP can promote sustainable growing environments for trees in urbanized areas by allocated adequate soil volumes and landscaped area through development, site alteration, and public infrastructure projects. Implement policies to reduce overall greenhouse gas emissions to prepare for the Municipality’s future climate. This includes implementing a sustainability, climate change adaptation/mitigation and low carbon lens to reviewing development applications. There is an opportunity to consider policy related to air quality improvement, energy conservation for existing and planned buildings, and water conservation.
Section 2.8 establishes policies related to community improvement, including the establishment of Community Improvement Plans (CIP).	Section 2.8.3 outlines the various criteria used to identify areas suitable to be a CIP project area.	<ul style="list-style-type: none"> Section 28 of the <i>Planning Act</i> enables municipalities to designate a Community Improvement Project Area and adopt a CIP. Attainable Housing Study Recommendation #6 recommends adding an Official Plan policy that states the 	General Housing	<ul style="list-style-type: none"> Section 2.8.3 should be broadened to address emerging topics suitable for community improvement, including: <ul style="list-style-type: none"> Ensuring the maintenance and renewal of older housing stock Support the development of affordable and attainable housing

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		Municipality may provide financial and non-financial incentives to support the development of affordable/attainable housing.		<ul style="list-style-type: none">○ Promote intensification in targeted areas○ Promote on-farm diversification or other measures to promote economic activity in the rural areas○ Promote energy efficiency and sound environmental design○ Conserve cultural heritage resources and encourage the preservation and adaptive re-use of built heritage <ul style="list-style-type: none">– Policy should be revised to require the review and monitoring of CIPs and update the plans and other programs.
New policy opportunity.	The SCOP does not currently make reference to complete streets, and only contains limited references to non-motorized transportation like walking or cycling.	<ul style="list-style-type: none">– Section 2 of the <i>Planning Act</i> includes “the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians” as a Provincial interest– Section 1.5.1 of the PPS, 2020 directs that public streets should be safe, be pedestrian-friendly, and facilitate active transportation.– Transportation Master Plan recommendation #1 is to introduce Complete Streets policies to promote equal consideration to multiple transportation mode users in order to provide a balanced and inclusive transportation network.	Infrastructure Complete Communities	<ul style="list-style-type: none">– New Section 2.1 should integrate the overall transportation vision articulated in the Transportation Master Plan, which aligns with the Complete Streets approach.– Implement policies based on the Core Commitments of the Complete Streets Canada Guiding Principles, which include:<ul style="list-style-type: none">○ Consideration of pedestrians, cyclists, transit riders, and drivers when planning and designing new and upgrading existing roadways○ Consideration for the Complete Streets approach at all stages of a project (including privately funded projects)○ Identification of clear, accountable exceptions to the policy (e.g., where there may be negative impacts to the natural environment)○ Provision of seamless transitions between facilities and modes, and convenient route planning (i.e., first- and last-mile planning)– There is an opportunity to include a set of evaluation criteria for monitoring the performance of complete streets elements and understanding future needs
				REVISED Chapter 2: Municipal-Wide Policies
-	-	-	-	A revised section is proposed in order to consolidate the various duplicated policies in the SCOP that currently are applied separately to Strathroy, Mount Brydges, and the Rural Area. It is anticipated that this Chapter will include the following sections:

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
				<div><div>–</div><div><div>Section 2.1 – Transportation & Mobility Policies (consolidating the following existing sections: 3.4.1, 4.4.1, and 5 .4, and new trails policies)</div><div><div>○ Trails</div><div>○ Complete Streets</div><div>○ Road Network (including right of way widths and new roads)</div><div>○ Public Transportation</div><div>○ Rail & Goods Movement</div></div></div><div><div>–</div><div><div>Section 2.2 – Servicing and Infrastructure Policies (consolidating the following existing sections: 5.3.3.5, 4.4.2, 4.4.3, 3.4.2, 3.4.3, 3.4.4, 7.1)</div><div><div>○ Servicing Hierarchy (Settlement Area, Non-Settlement Areas)</div><div>○ Servicing Allocation</div><div>○ Stormwater Management</div><div>○ Public Utilities and Infrastructure (including policies related to broadband internet)</div></div></div><div><div>–</div><div><div>Section 2.3 – Complete & Healthy Communities Policies consolidating the following existing sections:</div><div><div>○ Commerce (2.3)</div><div>○ Community Gardens (New)</div><div>○ Community Improvement (2.8)</div><div>○ Culture (2.10)</div><div>○ Climate Change, Energy Conservation & Generation, and Air Quality (New)</div><div>○ Heritage and Archaeological Resources (2.9)</div><div>○ Home Occupations (3.3.4.12, 4.3.1.9, 5.3.1.17, 5.3.3.6, 5.3.6.3)</div><div>○ Home Industries (New)</div><div>○ Industry (2.1)</div><div>○ Urban & Rural Character (2.6)</div></div></div></div></div></div>

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
				<ul style="list-style-type: none"> – Section 2.4 – Parks and Recreation Policies (consolidating the following existing sections (3.3.6.2, 3.3.6.3, 3.3.6.4, 4.3.4.3)) – Section 2.5 – Housing Policies (consolidating existing Section 2.4), plus the following new and existing policies: <ul style="list-style-type: none"> ○ Additional Residential Units (3.3.4.7.1, 4.3.1.4.1, 5.3.1.12.1) ○ Garden Suites (7.4.5.3, 5.3.1.12) ○ Group Homes (3.3.4.10) ○ Tiny Dwellings (New)
Chapter 3: Strathroy				
Section 3.1 describes the character and image of Strathroy. Section 3.2 establishes a series of goals and objectives for Strathroy.	This section contains some outdated references and projections and should be reviewed and refreshed in line with consultation completed throughout the Growing Together project.	<ul style="list-style-type: none"> – Various inputs, including public consultation and visioning, and the Strathroy-Caradoc Strategic Plan. 	General Complete Communities	<ul style="list-style-type: none"> – It is recommended that this section be revised based on other changes proposed to the SCOP to reflect the context of Strathroy.
Section 3.3.1 establishes specific policies for Downtown Strathroy, including permitted primary & secondary uses. It also speaks to the future preparation of a Downtown Master Plan.	The outcomes of the Downtown Master Plan and Community Improvement Plan were implemented through OPA #11. Consideration can be had to consolidate OPA #11 into the SCOP.	<ul style="list-style-type: none"> – The Downtown Strathroy Master Plan was revised in 2020 to identify opportunities for improvements and redevelopment. – The Strathroy-Caradoc Strategic Plan supports an increase in density and rental options in Downtown Strathroy. – Regional Commercial Systems Study Recommendation #5 recommends protecting and enhancing the function of Downtown Strathroy. 	Complete Communities	<ul style="list-style-type: none"> – It is recommended that OPA #11 be consolidated into the SCOP. – Specific policy should be introduced that protects the commerce function of the downtown core by requiring ground-floor retail uses to be occupied by commercial uses – Clarity should be added that secondary residential units should be on upper floors or at the rear, within the principal building or in a separate building having a separate entrance from the commercial entrance. Policy should ensure that the remaining commercial use remains viable, and that the secondary residential unit will not have an adverse impact on adjacent commercial operations. – The goals and objectives for Downtown Strathroy can be revised to include support for cultural events, festivals, and flexible outdoor spaces (e.g., cafes, patios) to leverage main street as a destination
New policy opportunity	There may be an opportunity to create a Special Policy Area for the Kenwick Mall site in Downtown Strathroy.	<ul style="list-style-type: none"> – The Downtown Master Plan, 2020 considers the Kenwick Mall site as the largest opportunity for the downtown. The plan envisions the redevelopment of the 	Complete Communities	<ul style="list-style-type: none"> – Consideration should be given to identifying the Kenwick Mall site as a special policy area that allows for a gradual transition of uses that complement the downtown core, including the opportunity to increase people and jobs density on site, allow for a greater

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
		Kenwick Mall site as a focus for intensive mixed-use development containing residential uses.		intensity of residential uses that support the downtown and opportunities for parking.
Section 3.3.2 establishes policies for urban commercial areas of Strathroy, including permitted uses and the form of development.	<p>There may be an opportunity to revise the permitted uses and development standards to better reflect current trends in retail.</p> <p>There is also an opportunity to confirm the hierarchy of retail uses between Downtown Strathroy and the commercial centres outside of Downtown.</p>	<ul style="list-style-type: none"> The Regional Commercial Systems Study provides policy recommendations to consider for the commercial areas of the Municipality. Regional Commercial Systems Study Recommendations: <ul style="list-style-type: none"> #3: Consider removing the minimum size threshold for free-standing retail outlets and the number of retail outlets in areas designated commercial in the south end of Strathroy, to allow for a more diverse range and scale of uses as demand for big-box retail softens. #4: Protect and direct commercial development in the established commercial nodes and corridors. 	Complete Communities	<ul style="list-style-type: none"> It is recommended that the existing Commercial designation be streamlined to remove residential and institutional uses from the list of secondary uses. A new Mixed-Use Designation should be introduced, which contemplates at-grade commercial uses with residential uses permitted on the upper storeys. Within this new designation, high-density residential uses would be permitted to a maximum height of 10 storeys, subject to urban design and other criteria. It is recommended to remove policy direction in section 3.3.2.3 directing that a minimum size for Commercial development in the south end of Strathroy may be specified in the Zoning By-law. Consideration could be given to breaking out the Commercial designation into Commercial Node and Commercial Corridors and establishing policies more specific to each existing land use pattern
Section 3.3.3 establishes policies for urban industrial areas of Strathroy, including permitted uses and the form of development	<p>There may be an opportunity to revise the permitted uses and form of development policies to support local economic development objectives and job creation.</p> <p>Clarifying desired and desired uses in employment areas in the Municipality can help to project key employment lands from encroachment.</p>	<ul style="list-style-type: none"> The Employment Lands Study provides recommendations to consider for the industrial areas of the Municipality. Employment Lands Study Recommendations: <ul style="list-style-type: none"> #3 recommends restricting major retail uses in urban employment areas. #4 recommends providing stronger direction regarding employment-supportive uses in urban employment areas. The PPS provides new direction related to the development of sensitive land uses adjacent to employment lands. Section 1.3.2.2 has been added to require municipalities to assess employment areas 	Complete Communities General	<ul style="list-style-type: none"> Consideration should be given to renaming the Industrial land use designation to Urban Employment Area for industrial lands in Strathroy and Mount Brydges It is recommended to expand policies discouraging major retail development in Urban Employment Areas It is recommended to introduce more defined policy direction in the outline the goals and objectives related to employment-supportive uses in Urban Employment Areas (e.g., non-industrial, non-office uses should be of limited scale, or focused on serving businesses and employees in the Employment Areas). Such uses should minimize potential land-use conflicts and support a viable mix of commercial and industrial land uses. Consideration could be given to the introduction of more defined criteria or descriptions regarding the appropriate type, size and location of complementary non-industrial uses in Urban Employment Areas (e.g., eating establishments, daycares, personal and health care services and smaller-scale, service-

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		<p>at the time of an official plan review, and to ensure employment areas planned for industrial and manufacturing uses provide separation or mitigation from sensitive land uses to maintain the long-term viability of these areas. Section 1.3.3.3 prohibits a wider range of uses that are not ancillary to primary employment areas, including residential uses. Together these two policies speak to the location relationship between industrial and manufacturing uses, and sensitive land uses to provide adequate separation and maintain viability of the industrial uses.</p> <ul style="list-style-type: none"> Section 1.2.6.2 outlines specific enhanced criteria to better protect industrial and manufacturing uses with more concrete conditions with respect to sensitive land uses. Municipalities are required to permit proposed sensitive land uses only if there is a demonstrated need and no reasonable alternative location(s) for the uses, and potential adverse effects to both the proposed uses and industrial uses are minimized and mitigated 		<p>oriented businesses) at strategic and accessible locations in existing and future Urban Employment Areas, where appropriate.</p> <ul style="list-style-type: none"> With cannabis production facilities permitted within employment areas, it may be desirable to provide specific policies related to these uses. The SCOP currently permits a range of industrial uses but does not specifically address cannabis cultivation. Cannabis cultivation facilities typically require enhanced site design, including security and odour abatement measures, which can present conflicts between the use and sensitive land uses. Typically, business uses are located between sensitive uses and traditional industrial areas to create a transitional buffer. Therefore, the SCOP should establish a policy which categorizes cannabis production facilities as a traditional industrial use to allow improve land use compatibility. There are also additional use specific policies which can be introduced into the SCOP: <ul style="list-style-type: none"> Only permitting cannabis production facilities through a site-specific zoning by-law amendment (i.e., not pre-zoning the use); Directing the zoning by-law to establish detail lot and building requirements for the use; Requiring site plan control to address matters related to traffic, groundwater, lighting, noise etc.; and, Requiring specific studies.
Section 3.3.4 establishes policies for urban residential areas of Strathroy.	There is an opportunity to revise this section to promote higher density forms of housing (e.g., townhouses, mid-rise apartment buildings). Section 3.3.4.1 establishes that a range of housing types and densities ranging from single detached dwellings to high-rise apartment buildings are permitted.	<ul style="list-style-type: none"> The PPS supports the development of a range and mix of residential housing types (Section 1.1.1.b). The County OP permits a range of uses within urban areas, including residential, commercial, and institutional uses (Section 3.2.4) Attainable Housing Study Recommendation #5 recommends expanding on the dwelling types categorized as low, medium and high 	Housing Complete Communities	<ul style="list-style-type: none"> A new harmonized Residential land use designation is recommended to be applied in both Strathroy and Mount Brydges. There is an opportunity to rename this designation to the “Neighbourhood” designation to reflect both residential and non-residential uses which exist in these areas. Clarity is required in terms of the types of residential dwellings permitted. The designation should explicitly permit the following: <ul style="list-style-type: none"> Low Density Residential – single detached, semi-detached, duplex, triplex dwellings, and converted dwellings. This range of uses recognizes that up to three

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		<p>density and update the Zoning By-law to ensure it aligns with the Official Plan.</p> <ul style="list-style-type: none"> – Attainable Housing Study Recommendation #15 recommends encouraging medium density residential dwellings within Mount Brydges and Strathroy, subject to criteria to ensure they are compatible with existing neighbourhoods. 		<p>dwelling units are permitted on a lot as part of the additional residential unit framework.</p> <ul style="list-style-type: none"> ○ Medium Density Residential – four-plex, six-plex, row or block townhouse dwellings, walk-up apartments (up to three storeys or a maximum height), subject to criteria. ○ High Density Residential – stacked townhomes and apartment dwellings (up to six storeys or a maximum height), subject to criteria. – Small-scale commercial uses should be permitted within the Residential designation (e.g., convenience commercial, personal service uses) to meet the daily shopping needs of the neighbourhood. – Clarity should be added that medium and high-density residential uses will be subject to site plan control. – Policy should support lot consolidation to promote development of medium and high-density residential development. – All references to “churches” should be replaced with “places of worship” throughout the SCOP.
<p>Section 3.3.4.5 and 3.3.4.6 provide policies for medium density and high-density development, respectively.</p> <p>Section 3.3.4.7 relates to residential intensification.</p>	<p>Policies should be clarified to ensure development criteria is consistently assessed according to clear performance measures. Subjective terms such as “fit”, “complement”, “not adversely impact” should be avoided unless accompanied by urban design guidelines or more detailed direction.</p> <p>Further policy guidance is required for buildings greater than 3-storeys in height.</p>	<ul style="list-style-type: none"> – The PPS requires municipalities to provide for an appropriate range and mix of housing options and densities and supports the established of development standards for residential intensification, redevelopment, and new residential development (Section 1.4.3). – The County Official Plan requires 15% of all development to be by way of intensification and redevelopment. – The Municipality’s Growth Management and Housing Report (2020) notes the following: <ul style="list-style-type: none"> ○ The local housing market is missing key housing types and tenures to address the Municipality’s housing needs, including apartment units, street-level multiple dwellings (rental & owned), and low-rise multiple 	<p>Housing Complete Communities</p>	<ul style="list-style-type: none"> – The Municipality’s intensification target will be set at 15% in accordance with the County’s OP. – The following minimum density targets will be incorporated into the SCOP: <ul style="list-style-type: none"> ○ Low Density Residential – 15 units per hectare ○ Medium Density Residential – 37 units per hectare ○ High Density Residential – 74 units per hectare – Clarity should be added related to density as to what is included within net density and what is excluded

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
		<ul style="list-style-type: none"> units such as four-plexes and six-plexes. ○ Recommends incorporating minimum and maximum residential density targets and aims to diversity housing options in Mount Brydges. 		
Section 3.3.4.7.1 permits the establishment of one secondary dwelling unit in a main residential use or within an accessory building to the main residential use.	There is a need to review and update policies regarding Additional Residential Units (ARUs). ARUs, a Provincial term, refers to additional dwelling units that are within an accessory building or are contained entirely within a single detached, semi-detached, or townhouse dwelling.	<ul style="list-style-type: none"> – The <i>Planning Act</i> has been updated to consider that two ARUs be contemplated on lots in conjunction with single detached, semi-detached, and townhouse dwellings. – Attainable Housing Study Recommendation #17 provides direction related additional residential units. 	Housing	<ul style="list-style-type: none"> – It is recommended that up to two additional dwelling units be permitted on a lot within a single detached, semi-detached, or townhouse dwelling, or within an attached or detached accessory building or structure associated with one of those dwellings. – Criteria is required for detached ARUs on a townhouse lot – Policy should encourage the establishment of ARUs within existing residential areas and within new developments. – A maximum of two ARUs will be permitted on a lot, one within the principal dwelling and one within an accessory structure (for a total of three dwellings on a lot). – The zoning by-law will be directed to establish appropriate provisions. – ARUs will be prohibited within natural hazard lands, including flood prone areas.
Section 3.3.4.8 permits the conversion of existing single detached dwellings into multiple unit residential dwellings.	Converted dwellings are currently only permitted within Strathroy and are subject to a wide range of criteria.	<ul style="list-style-type: none"> – Attainable Housing Study Recommendation No. 16 recommends permit the conversion of existing single unit dwellings or the development of new multiple unit dwellings in areas predominantly characterized by single unit dwellings on the condition that they maintain the residential character of the neighbourhood. 	Housing	<ul style="list-style-type: none"> – Converted dwellings (2 or more units) should be broadly permitted across both Mount Brydges and Strathroy. – There is an opportunity to identify the maximum number of units permitted within an existing converted dwelling. This could be a maximum three units in line with the maximum three additional residential units permitted on a lot. – Policy language will distinguish clearly between converted dwellings and dwellings with Additional Residential Units
Section 3.3.4.10 establishes policies for group homes, including requirements for the Zoning By-law to regulate their type, size, and location.	Any reference to minimum distance separation for group homes should be removed as these policies conflict with the Ontario Human Rights Code. The SCOP permits group homes broadly within residential	<ul style="list-style-type: none"> – Section 35(2) of the <i>Planning Act</i> says municipalities may not pass zoning bylaws that distinguish between people who are related and people who are unrelated in respect of the occupancy or use of a building. For example, a zoning by-law 	Housing	<ul style="list-style-type: none"> – Revise policy to remove any minimum separation distance requirements between two group homes to ensure these policies are consistent with the Ontario Human Rights Code. – There may be a need to distinguish between types of group homes – those which provide a correctional purpose, and those that do not.

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
	areas and prefers mixed-use locations on major roadways.	<p>cannot stipulate that a family rather than roommates must occupy a house.</p> <ul style="list-style-type: none"> – Attainable Housing Study Recommendation #9 recommends the removal of references to minimum separation distances between two group homes. 		
Section 3.3.4.12 establishes policies for home occupations which are secondary to a principal residential use.	<p>There is an opportunity to establish more comprehensive policies for home occupations to address matters such as parking signage, and outdoor storage*.</p> <p>The COVID-19 pandemic has also seen the rise of new forms of home-based businesses such as food-based businesses and online retail.</p> <p>*this applies to the various home occupation policies throughout the SCOP</p>	<ul style="list-style-type: none"> – The Province of Ontario has expanded permissions under the <i>Health Protection and Promotion Act</i> to allow home-based food businesses which can sell low-risk foods which are non-hazardous and do not require refrigeration. 	Pandemic Recovery	<ul style="list-style-type: none"> – It is recommended that the policy be revised to prohibit outdoor storage in association with a home occupation. – The policy should be revised to address on-site parking for the home occupation, in addition to the parking required for the principal residential use. – It is recommended that the policy be revised to specify that home occupations include food-based food businesses and online (curbside) retail.
Section 3.3.6 establishes policies for Open Space, including Table 1 which sets the classification and standards for parks and open space (i.e., parks classifications and minimum hectares).	<p>There may be a need to revise the classification of parkland, as well as the current rate of 8 ha. per 1000 residents.</p> <p>The Municipality's current policies establish the 5%, 2% and cash-in-lieu allowances, but do not allow for an alternative parkland rate. An alternative rate is advantageous for residential proposals exceeding 15 units per hectare. This policy change should be considered as it will help ensure that growth pays for growth.</p>	<ul style="list-style-type: none"> – The Parks and Recreation Master Plan establishes several key directions related to parks and open spaces. – The current <i>Planning Act</i> and changes introduced through Bill 197 have implications on the provision of parkland. Bill 197 permits a municipality to approve an alternate parkland dedication rate through a By-law. – The Municipality's Parkland Dedication By-law (2019) sets out parkland dedication rates and cash-in-lieu of parkland rates. 	Complete Communities	<ul style="list-style-type: none"> – A single policy regime for Parks & Recreation will be established in Section 2 of the SCOP that applies across the entire Municipality, with Section 3 containing policies for the Parks & Open Space Designation. – The parks & recreation vision statement and guiding principles will be integrated into the SCOP. – The parkland classification system and per capita targets (2.0 ha. of active parkland per 1,000 residents) for parkland will be referenced in the SCOP. <ul style="list-style-type: none"> ○ Neighbourhood Parks ("Active Parkland") ○ Community Parks ("Active Parkland") ○ Major Parks ("Active Parkland") – The parkland dedication rates in the SCOP will be made consistent with the Municipality's Parkland Dedication By-law. – Ensure that natural areas/open space are not accepted as part of the required parkland dedication.

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
				<ul style="list-style-type: none"> There is an opportunity for the Municipality to consider the introduction of an alternate parkland dedication rate (1ha:300 units if land, or 1ha:500 units if cash). This would require a subsequent update to the Municipality's Parkland Dedication By-law to introduce this alternate rate. Under change enacted through Bill 197, a Parkland Dedication By-law is able to be appealed following adoption.
Section 3.3.7 establishes policies for the Natural Heritage designation within Strathroy, including wetlands and woodlands.	<p>There is a need to review and update the policies and mapping for the natural heritage system.</p> <p>The SCOP prohibits development within wetlands and reiterates the County's requirements for a Development Assessment Report (DAR) within 120 m of the feature but does not distinguish between evaluated and unevaluated wetlands. Greater clarity is needed to identify Provincially Significant Wetlands.</p>	<ul style="list-style-type: none"> The PPS requires a natural heritage system to be established per Section 2.1.3. The MNHSS recommends that official plan policies be updated to encourage protecting the natural heritage system, in lieu of singular features. The MNHSS provides a strong basis to inform policy and mapping updates the in SCOP. Wetlands are deemed to be "Provincially Significant" if they meet the criteria of the Ontario Wetland Evaluation System and are confirmed by the Ministry of Natural Resources and Forestry. Municipalities may also define and identify locally significant wetlands, including those wetlands that may not have been evaluated. The Conservation Authorities maintain their own Operation Guidelines, procedures and policies that provide direction on matters of importance for Official Plans, such as regulations for wetlands and buffering. 	Natural Environment & Climate Change	<p>The policies of Section 3.3.7 will be consolidated into a new "Section X.X – Natural Heritage System & Hazards" policy section.</p> <p>See proposed policy directions related to Section 4.3.6 for further details.</p>
Section 3.3.8 establishes policies for the Urban Reserve designation.	The only application of the Urban Reserve designation is the lands East of Saxton Road which have been subject to the approved OPA #13 to re-designate the lands as part of Phase 1 of the OPR. There may be a need to re-visit the application	<ul style="list-style-type: none"> OPA #13 is proposed to re-designate the lands East of Saxton Road within the Residential designation. 	Growth Management	<ul style="list-style-type: none"> It is recommended that OPA #13 be consolidated into the SCOP through the OPR. There is an opportunity to remove the Urban Reserve land use designation from the SCOP given that it is no longer applied in the Municipality following Council's adoption of OPA #13.

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
	of or future need for this designation in the updated SCOP.			
<p>Section 3.4 establishes policies for infrastructure within Strathroy, including roads, water supply, sanitary sewage, and stormwater management.</p>	<p>There will be a need to review and update the noted rated capacities for the sanitary sewage system, as well as the current state of the water supply system.</p> <p>There is a need to consider green, sustainable approaches to infrastructure as the Municipality adapts to climate change.</p> <p>There is a need to review and update the Municipality's road network and associated policies for the new planning horizon and to address themes such as complete streets.</p> <p>There may also be an opportunity to revise Table 2 which sets out the road design widths for the road hierarchy (i.e., local, arterial, and collector roads).</p> <p>There is an opportunity to review the servicing policies of the OP to reflect communal services within the servicing hierarchy.</p>	<ul style="list-style-type: none"> – The PPS directs municipalities to plan for transportation systems to be safe, energy efficient, facilitate the movement of people and goods, and meet projected needs (Section 1.6.7). – Section 1.6.6.3 of the PPS directs that where municipal services are not available, planned, or feasible, private communal sewage services and private communal water services are the preferred form of servicing for multi-unit/lot development. The servicing hierarchy expressed in Sections 1.6.6.2-5 of the PPS and reinforced in other legislation, regulations and guidelines, distinguishes between municipally owned services and private communal services, but does not define the type of municipal service. Therefore, municipally owned or operated communal servicing would not be in the 'second tier' of servicing options. – Section 2.4.5.1 of the County's Official Plan establishes the County's preferred servicing hierarchy. – Section 1.6.2 of the PPS and other Provincial policies promote green infrastructure. Green infrastructure is also a defined term in the PPS. – The Servicing Capacity and Constraints Study will provide recommendations which can inform updates to the SCOP. – The Transportation Master Plan provides updates to roadway widths and road classifications. 	Infrastructure	<ul style="list-style-type: none"> – It is recommended that Section 3.4.1 be consolidated with the Transportation and Mobility policies of the SCOP. <p>Section 3.4.2 - Public Water Supply System</p> <ul style="list-style-type: none"> – Awaiting recommendations from the Servicing Capacity & Constraints Study. <p>Section 3.4.3 - Public Sanitary Sewage System</p> <ul style="list-style-type: none"> – Awaiting recommendations from the Servicing Capacity & Constraints Study. <p>Section 3.4.4 - Stormwater Management</p> <ul style="list-style-type: none"> – Policies related to stormwater management should be extended to Mount Brydges and the rural areas. – The North Meadows Secondary Plan can serve as basis for updating stormwater management policies within Strathroy and Mount Brydges, particularly as it relates to SWM ponds, low impact development, and quality/quantity controls. – As recommended by the TMP, low impact development (LID) measures should be integrated into boulevards within the ROW where appropriate, together with other retention control methods to account for local soil and water table conditions <p>Communal Servicing (New)</p> <ul style="list-style-type: none"> – Policies related to communal servicing within the community settlement areas should be updated to reflect the new servicing hierarchy set out in the PPS, 2020. It is recommended that Private Communal Servicing be limited / avoided within Strathroy-Caradoc. <p>Servicing Hierarchy</p> <ul style="list-style-type: none"> – Urban Settlement Areas (Strathroy & Mount Brydges) – Full Servicing – Hamlet Settlement Areas (Melbourne) – Partial Services <p>General</p> <ul style="list-style-type: none"> – There is a need to establish general infrastructure policies which address:

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
				<ul style="list-style-type: none"> Delivering infrastructure that is sustainable, durable, and resilient to climate change, including extreme weather events (PPS 1.6.6.1.b) Ensuring existing and planned corridors are protected to meet current and project needs in accordance with the PPS. Encouraging lot-level controls by private property owners. Promoting the use of existing infrastructure.
Section 3.4.1 establishes policies for the classification of roadways in Strathroy, as well as right-of-way widths and improvements to roads and intersections	<p>Road classifications currently differ slightly between the Strathroy, Mount Brydges and Rural parts of the existing SCOP.</p> <p>The existing road classifications also do not reference complete streets aspects like pedestrian, cycling, or transit facilities.</p>	<ul style="list-style-type: none"> Transportation Master Plan recommendation #2 is to update the Municipality's road classification system to align with a Complete Street lens as outlined in the TMP vision statement, and harmonize road classifications across Strathroy, Mount Brydges, and the rural communities. 	<p>Infrastructure</p> <p>Complete Communities</p>	<p>Section 3.4.1 – Roads</p> <ul style="list-style-type: none"> It is recommended to harmonize the road classifications, currently defined differently in Strathroy, Mount Brydges, and the Rural areas, into one table in new Section 2.1 Roadways will be classified as Arterial, Collector, or Local, with defined and consistent functions, speeds, volumes, ROWs, intersection spacing, parking facilities, and signalization priorities. Roadway classifications will also introduce considerations through the lens of Complete Streets, for walking, cycling, and transit.
New Policy opportunity	No existing policy in the SCOP for the efficient use of paved shoulders or provision of active transportation facilities on Municipal roads	<ul style="list-style-type: none"> Transportation Master Plan recommendation #4 is to introduce standards and policies requiring new developments to provide sidewalks on both side of the street in urban conditions and cycling facilities along collectors and arterial roads. 	<p>Infrastructure</p> <p>Complete Communities</p>	<ul style="list-style-type: none"> Recommendation to introduce policy requiring new developments to provide sidewalks on both side of the street in urban conditions and cycling facilities along collectors and arterial roads, to the satisfaction of the Municipality. Additional opportunity for policy committing to provision of active transportation facilities whenever Municipality is considering road rehabilitation/reconstruction through its Capital Budget
New Policy opportunity	No existing policy in the SCOP for traffic calming measures	<ul style="list-style-type: none"> Section 1.5.1 of the PPS, 2020 directs that public streets should be safe, be pedestrian-friendly, and facilitate active transportation. Transportation Master Plan recommendation #5 is to establish a traffic calming policy to allow for a range of programs or measures to reduce the risk to non-motorized road users. 	<p>Infrastructure</p> <p>Complete Communities</p>	<ul style="list-style-type: none"> It is recommended to include a traffic calming policy with the following objectives: <ul style="list-style-type: none"> Increase awareness and education regarding roadway usage and driver behaviour; Restore and maintain the designed purpose and function of the roadway; Provide high quality of life to residents through reduced conflicts; and Determine appropriate measures for its intended improvements within a reasonable cost.

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
				<ul style="list-style-type: none"> The policy can further direct that intervention opportunities for traffic calming should be determined using the <i>Canadian Guide to Traffic Calming</i> published by the Transportation Association of Canada and Canadian Institute of Transportation Engineers.
Chapter 4: Mount Brydges				
Section 4.1 describes the character and image of Mount Brydges.	This section contains some outdated references and projections and should be reviewed and refreshed in line with consultation completed throughout the Growing Together project.	<ul style="list-style-type: none"> Various inputs, including public consultation and visioning, and the Strathroy-Caradoc Strategic Plan. 	General	<ul style="list-style-type: none"> This section will be revised to reflect the current context of Mount Brydges.
Section 4.3.1 establishes policies for urban residential areas of Mount Brydges.	<p>There is an opportunity to revise this section to promote higher density forms of housing (e.g., townhouses, mid-rise apartment buildings).</p> <p>For example, Section 4.3.1.3 requires that the density and form of new residential development shall complement and reinforce the ‘small’ village character of Mount Brydges.</p>	<ul style="list-style-type: none"> The PPS supports the development of a range and mix of residential housing types (Section 1.1.1.b) The PPS requires municipalities to provide for an appropriate range and mix of housing options and densities and supports the established of development standards for residential intensification, redevelopment, and new residential development (Section 1.4.3). The Attainable Housing Study provides recommendations to improve the supply of attainable housing within the Municipality. 	Housing Complete Communities	<ul style="list-style-type: none"> See recommendations related to the residential designation in Strathroy. Policies should be clarified to ensure development criteria is consistently assessed according to clear performance measures. Subjective terms such as “complement”, “not adversely impact” should be avoided unless accompanied by urban design guidelines or more detailed direction. The policy notes that density and height shall be strictly controlled, without provided specific performance metrics.
Section 4.3.1.6 encourages the introduction of innovative housing forms, subject to criteria.	There is an opportunity to include examples of innovative housing forms within this policy.	<ul style="list-style-type: none"> The Attainable Housing Study (Recommendation #18) recommends building on Section 4.3.1.6 to remove barriers in policy to innovative housing forms and construction methods. The <i>Planning Act</i> has been updated to permit ARUs within detached accessory structures on a lot. The PPS requires municipalities to provide for an appropriate range and mix of housing options (1.4.3), including through residential intensification in part through additional residential units. 	Housing	<ul style="list-style-type: none"> The SCOP can reference innovative housing forms including tiny homes and modular housing. It is recommended that specific policy be added to the new Specific Use Policies to address tiny dwellings. Tiny dwellings would be permitted as a principal dwelling or additional residential unit on a lot, subject to criteria. Criteria should address the following (in accordance with the PPS): <ul style="list-style-type: none"> Appropriate levels of infrastructure and public service facilities Requiring the zoning by-law to establish appropriate lot and building requirements Consideration of minimum lot sizes

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
				<ul style="list-style-type: none"> – It is also recommended that references to the “character of neighbouring residential areas” be removed or clarified as this can be misinterpreted to mean “the same as”. The term “complements” should be considered. – It is recommended that this policy move to Section 2.4 to apply across the Municipality.
Section 4.3.1.4.1 permits the establishment of one secondary dwelling unit in a main residential use or within an accessory building to the main residential use.	There is a need to review and update policies regarding Additional Residential Units (ARUs). ARUs, a Provincial term, refers to additional dwelling units that are within an accessory building or are contained entirely within a single detached, semi-detached, or townhouse dwelling.	<ul style="list-style-type: none"> – The <i>Planning Act</i> has been updated to consider that two ARUs be contemplated on lots in conjunction with single detached, semi-detached, and townhouse dwellings. 	Housing	See policy direction associated with Policy 3.3.4.7.1. It is recommended that this section be consolidated with other policies related to ARUs.
Section 4.3.2 establishes policies for urban commercial areas of Mount Brydges, including permitted uses and the form of development.	There may be an opportunity to revise the permitted uses and form of development policies to better reflect current trends in retail.	<ul style="list-style-type: none"> – The Regional Commercial Systems Study provides policy recommendations to consider for the commercial areas of the Municipality. – Regional Commercial Systems Study Recommendation #2 is to ensure that Mount Brydges can accommodate commercial demand given the sufficient supply of commercial land to 2046. <ul style="list-style-type: none"> ○ It would also be possible to achieve the commercial demand forecast for Mount Brydges on less land based on higher utilization of the land (i.e., building coverage and employment density). 	Complete Communities	<ul style="list-style-type: none"> – It is recommended to include policies to protect designated existing and vacant designated commercial lands in Mount Brydges <ul style="list-style-type: none"> ○ These policies should include a requirement that mixed-use development on designated commercial lands should maintain the existing commercial employment density, and that new mixed-use development on vacant designated commercial lands should contribute to meeting the forecast commercial development demand in Mount Brydges to 2046 – Consideration could be given to encouraging intensification of existing commercial lands to meet the commercial demand forecast with less required land
Section 4.3.3 establishes policies for urban industrial areas of the Mount Brydges, including permitted uses and the form of development	There may be an opportunity to revise the permitted uses and form of development policies to support local economic development objectives and job creation.	<ul style="list-style-type: none"> – The Employment Lands Study will provide recommendations to consider for the industrial areas of the Municipality. 	General	See Policy Directions related to Section 3.3.3. It is recommended that this section be consolidated with the industrial designation for Strathroy.

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
Section 4.3.4 establishes policies for Open Space in Mount Brydges, and notes that additional parkland is not required in the community.	There may be a need to review and revise this section based on the outcomes of the Parks and Recreation Master Plan to ensure sufficient parkland is planned for in Mount Brydges.	<ul style="list-style-type: none"> The Parks and Recreation Master Plan establishes a revised rate for parkland and open spaces, and/or revised parks classifications. 	Complete Communities	See Policy Directions related to Section 3.3.6. It is recommended that this section be consolidated between Mount Brydges and Strathroy.
Section 4.3.6 establishes policies for the Natural Heritage designation within Mount Brydges, including wetlands and woodlands.	<p>There is a need to review and update the policies and mapping for the natural heritage system.</p> <p>The SCOP does not use the term ‘natural heritage system’.</p> <p>The SCOP does not provide specific policy protections for significant wildlife habitats.</p>	<ul style="list-style-type: none"> The PPS requires a natural heritage system to be established per Section 2.1.3. The MNHSS recommends that official plan policies be updated to encourage protecting the natural heritage system, in lieu of singular features. The MNHSS provides a strong basis to inform policy and mapping updates the in SCOP. Wetlands are deemed to be “Provincially Significant” if they meet the criteria of the Ontario Wetland Evaluation System and are confirmed by the Ministry of Natural Resources and Forestry. Municipalities may also define and identify locally significant wetlands, including those wetlands that may not have been evaluated. The Conservation Authorities maintain their own Operation Guidelines, procedures and policies that provide direction on matters of importance for Official Plans, such as regulations for wetlands and buffering. 	Natural Environment & Climate Change	<p>The policies of Section 4.3.6 will be consolidated into a new “Section X.X – Protecting Natural Resources” policy. It is recommended that Section 2.7 be consolidated into this new section.</p> <ul style="list-style-type: none"> Section X.1 – Natural Heritage System (Various) Section X.2 – Water Resources (6.2) Section X.3 – Mineral, Petroleum, and Mineral Aggregate Resources Section X.4 – Hazards <ul style="list-style-type: none"> Natural Hazards (6.1) Human-Made Hazards (6.5, 6.6) <p>Mapping</p> <ul style="list-style-type: none"> Based on the MNHSS, the current mapping on Schedule B and D will be reviewed and confirmed against updated mapping. This should also be confirmed again Conservation Authority and Ministry of Natural Resources & Forestry mapping data, particularly as it relates to significant woodlands and provincially significant wetlands. The SCOP should continue to offer protections to all significant woodlands. The MNHSS used a 4-hectare threshold to determine woodland significance; however, the SCOP may use the Natural Heritage Reference Manual’s tiered approach to size classification. Applying this size limitation may necessitate remapping. The MNHSS approach is in line with the policies of the PPS which permit the use of municipal approaches that achieve or exceed the same objectives of the PPS. <p>General</p> <ul style="list-style-type: none"> It is also recommended that the goals be updated to reflect the role of the natural heritage system protections in responding to climate change. The term ‘natural heritage system’ should be introduced into the SCOP.

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
				<ul style="list-style-type: none">– Policy can promote stewardship activities and other municipal & agency initiatives (e.g., tree planting).– The section will be reviewed to improve legibility and clarity regarding development within or adjacent to a significant natural heritage feature.– Protect the NHS from impacts of public infrastructure projects wherever possible, primarily limited to crossings (i.e., gas line, electricity lines, etc.). Infrastructure may be permitted within the natural.– Policy may require monitoring of the ecological health of the natural heritage system.– Policy should ensure the integration of natural heritage systems planning at multiple levels: regional, watershed, sub-watershed and/or secondary plan level.– The SCOP can consider establishing policy protections for Significant Wildlife Habitat as detailed mapping becomes available. <p>Provincial/County Policy Conformity</p> <ul style="list-style-type: none">– The SCOP should include policy protections for significant wildlife habitat as detailed mapping becomes available through site-specific assessments.– Consideration should be given to going above and beyond the PPS policy 2.1.3 that requires the identification of natural heritage systems. Specifically, the Municipality should consider affording policy protection for the natural heritage system features and linkages in addition to the existing protection provided to existing natural heritage features.– Consideration should be given to introduce a policy which addresses and protects features, functions, and linkages not otherwise identified in the SCOP. This direction recognizes that the NHS is dynamic and that municipal resources for mapping these features may not be sufficient for capturing all information at the time of preparing the SCOP. This satisfies the PPS requirement that features should be protected regardless of SCOP mapping. Further studies and assessments may identify these features in greater detail, and it may be appropriate to introduce these boundaries by way of a future Official Plan Amendment.

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
Section 4.4 establishes policies for infrastructure within Mount Brydges, including roads, water supply, sanitary sewage, and stormwater management.	<p>There will be a need to review and update the noted rated capacities for the sanitary sewage system, as well as the current state of the water supply system.</p> <p>There is a need to consider green, sustainable approaches to infrastructure as the Municipality adapts to climate change.</p> <p>There is a need to review and update the Municipality's road network and associated policies for the new planning horizon and to address themes such as complete streets.</p>	<ul style="list-style-type: none"> – The PPS directs municipalities to plan for transportation systems to be safe, energy efficient, facilitate the movement of people and goods, and meet projected needs (Section 1.6.7). – Section 1.6.2 of the PPS and other Provincial policies promote green infrastructure. Green infrastructure is also a defined term in the PPS. 	Infrastructure	<ul style="list-style-type: none"> – It is recommended that this section be consolidated into the new Infrastructure policy section of the SCOP in Section 2. – See policy directions related to Section 3.4 of the SCOP.
Chapter 5: Rural Area				
<p>Section 5.3.1 establishes policies for the Agricultural land use designation in the Municipality.</p> <p>Secondary farm occupations, which can be equated to the current term of on-farm diversified uses, and agriculture-related uses are permitted a secondary uses within the Agricultural designation.</p>	<p>Permitted uses and other policies for rural lands and prime agricultural lands must be reviewed to ensure they meet Provincial and County requirements, which generally intend to protect the agricultural land base from non-agricultural or non-compatible development and uses.</p> <p>Additionally, there is an intent to support farming operations and viability through appropriate flexibility, such as the permission of on-farm diversified uses.</p>	<ul style="list-style-type: none"> – Section 1.1.5 of the PPS apply to permitted uses and development on rural lands. – The PPS encourages municipalities to use an Agricultural System approach to maintain and enhance the geographic continuity of the agricultural land base and the functional and economic connections to the agri-food network (Section 2.3.2). Agricultural System is a newly defined term in the PPS. – The Province has released guidelines regarding permitted uses in Prime Agricultural Areas, which help guide on-farm diversified uses and agriculture-related use permissions. The Guidelines also establish considerations to ensure these uses remain secondary to the agricultural uses. 	Agriculture	<ul style="list-style-type: none"> – The permitted uses established in Section 5.3.1.1 and 5.3.1.2 should be reviewed to ensure that they are addressing the rural needs of the community and current farming practices. For example, this section can address indoor cannabis production and processing uses, as well as specialty farming practices (e.g., mushroom farming). – Section 5.3.1 should be revised to reference the Agricultural System approach in accordance with the PPS. The Agricultural System is a group of interconnected elements that collectively create a viable, thriving agricultural system through the agricultural land base and the associated agri-food network.

Existing Policy Characterization	Issue, Conflict, or Gap	Key Policy & Legislative Drivers and Resources	Thematic Area	Policy Directions
New Policy Opportunity.	N/A	<ul style="list-style-type: none"> The PPS states that municipalities may only permit non-agricultural uses in prime agricultural areas for extraction of minerals, petroleum resources, and mineral aggregate resources, and limited non-residential uses (Section 2.3.6). The Background Report prepared as part of the County's OP Review indicates that Section 2.3.6 of the PPS may be considered through the County's OPR. 	Agriculture	<ul style="list-style-type: none"> A new policy can be added which permits non-agricultural uses in prime agricultural areas, subject to the criteria of the PPS and Guidelines for Permitted Uses in Prime Agricultural Areas. Policy can also recognize that limited existing non-agricultural uses remain with prime agricultural areas. There is a need to consider policy for site-specific MDS consideration where a lot is entirely impacted by MDS. This policy can address resource-based recreational uses (considered a permitted use in rural lands per Section 1.1.5.2 of the PPS).
Section 5.3.1.5 addresses policies for Minimum Distance Separation (MDS) to avoid land use conflicts within the Agricultural designation.	There is an opportunity to review this section to confirm the application of MDS to on-farm diversified and agriculture-related uses.	<ul style="list-style-type: none"> The PPS requires new land uses in prime agricultural areas to comply with MDS formulae (Section 2.3.3.3). The MDS Formulae were updated in 2017 and provide implementation guidelines within an OP. The Background Report prepared as part of the County's OP Review suggests that MDS formulae are best prescribed in the lower-tier OP. 	Agriculture	See Policy Directions related to Section 5.3.1.14.
Section 5.3.1.6 establishes policies for the division of farm parcels, while Section 5.3.1.8 establishes policies for dwellings surplus to a farming operation.	There may be an opportunity to provide greater direction and clarity regarding how applications for surplus farm residence severances should be evaluated. There may also be an opportunity to provide additional direction for severances for agriculture-related uses to prevent over development of agricultural lands (e.g., a minimum lot size).	<ul style="list-style-type: none"> The PPS permits severances of surplus farm residences to facilitate farm consolidation (Section 2.3.4.1.c). The PPS permits lot creation for agricultural uses and agriculture-related uses, subject to criteria (Section 2.3.4.1.a-b). Section 4.5.3.4 of the County OP permits severances for agriculture-related uses when the use, due to its nature, must be located in close proximity to the agricultural operations which it serves. 	Agriculture	<ul style="list-style-type: none"> Clarity is required that severances are not permitted for on-farm diversified uses. In accordance with Section 2.3.4.1.b of the PPS, severances for agriculture-related uses may be permitted subject to criteria including consideration being given to alternative locations that do not require the consent and division of land and the proximity of the use to urban settlement areas. In accordance with Section 2.3.4.1.c of the PPS, severances related to surplus farm residences as a result of farm consolidation will be permitted subject to criteria. <ul style="list-style-type: none"> To satisfy the requirement that new residential dwellings are prohibited on any remnant parcel of farmland created by the severance (Section 2.3.4.1.c.2), it is recommended that policy direct the Municipality's zoning by-law to establish a new "Agricultural Consolidation" zone (or similar name). This new zone would be applied

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				<p>to remnant agricultural parcels following severance and would not permit a single detached dwelling.</p> <ul style="list-style-type: none"> ○ It is recommended that policy direction the Municipality's zoning by-law to establish a new "Rural Residential" zone (or similar name). This new zone would be applied to residential parcels following severance and would not permit farm/agriculture uses. ○ There is a need to align the approach for farm severances with other local municipalities in Middlesex County. <ul style="list-style-type: none"> – In accordance with Section 2.3.4.1.d of the PPS, severances related to infrastructure may be permitted where the facility or corridor cannot be accommodated through easements or rights-of-way. – Policy will be added that addresses lot adjustments and/or severances related to the conservation of natural heritage features within the rural area. – Efforts will be made to ensure that policies in this section align with the approach undertaken by other lower-tier municipalities in Middlesex County
<p>Section 5.3.1.9 establishes policies for secondary farm occupations to help ensure they are limited in scale and remain secondary to the principal farm use.</p>	<p>There may be an opportunity to provide greater detail in this policy with respect to permitted uses and standards to ensure they remain secondary to the principal use. More specific requirements can be outlined in the Municipality's zoning by-law. There is also an opportunity to identify those on-farm diversified uses which are not suitable in the agricultural area.</p> <p>The term 'on-farm diversified use' can be used to maintain consistency with Provincial policies.</p>	<ul style="list-style-type: none"> – The PPS permits on-farm diversified uses within prime agricultural areas (Section 2.3.3.1). Section 2.3.3 requires that on-farm diversified uses shall be compatible with, and shall not hinder, surrounding agricultural operations. Criteria for these uses may be based on guidelines developed by the Province or municipal approaches, as set out in municipal planning documents, which achieve the same objectives. – The Guidelines for Permitted Uses in Prime Agricultural Areas provide examples of on-farm diversified uses which would be permitted or would not typically be permitted, as well as criteria to ensure that they remain secondary to the principal agricultural use. 	<p>Agriculture</p>	<ul style="list-style-type: none"> – This section will be renamed "On-Farm Diversified Uses". Clarification is also required within this section between on-farm diversified uses and those agriculture-related commercial and industrial uses. – There is an opportunity for the SCOP to identify specific types of on-farm diversified uses that will be permitted. This can include innovative uses to stimulate rural economic development, including small scale retail/restaurant/café uses, temporary agricultural demonstration events, agri-tourism, home occupations, bed and breakfasts, and other similar uses. – The SCOP should also set out a series of considerations to ensure that on-farm diversified uses remain secondary to the principal farm use, including the amount of land devoted to diversification, the size of buildings, and the extent of retail sales which can occur as a component of diversification. – Agri-tourism uses should be directly addressed to avoid land use conflicts and the conversion of farm properties to non-agricultural

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		<ul style="list-style-type: none"> The Guidelines are clear that large-scale or repeated events with permanent structures (e.g., wedding event venues) are not considered on-farm diversified uses, however, farm event venues (e.g., plowing match, agricultural displays) are contemplated as on-farm diversified agri-tourism uses. 		<ul style="list-style-type: none"> uses. A clear definition and policy related to agri-tourism is required. Policy is required for larger, recurring events on farms (e.g., rural wedding venues).
Section 5.3.1.10 establishes policies for temporary dwellings on farms which accommodate farm help as part of a principal agricultural use.	<p>There may be an opportunity to review policies for temporary dwellings on farms and these should be reviewed against the revised framework for secondary dwelling units / additional residential units within the rural area. Consideration should also be had to distinguish between temporary and full-time farm help dwellings.</p> <p>The SCOP can also set out development standards to help improve the quality of housing for farm workers and set a framework for the Municipality's Zoning By-law.</p>	<ul style="list-style-type: none"> The PPS definitions for an agricultural use includes accommodation for full-time farm labour when the size and nature of the operation requires additional employment. The County OP permits temporary residential units for farm help if grouped with the existing farm buildings. The Guidelines for Permitted Uses in Ontario's Prime Agricultural Areas note that housing for farm workers is considered an agricultural use and is therefore permitted within prime agricultural areas. 	Agriculture Housing	<ul style="list-style-type: none"> It is recommended that this section be retained as it relates to temporary dwellings on farms, which are distinguished from permanent additional residential units. Clarification can be added that temporary dwellings shall not be permitted to be severed. Clarification can be added to the types of structures which can be considered temporary dwellings on farms, including units within an existing buildings, bunkhouses, mobile homes, expanded existing dwellings, etc. Clarification can be added that this use is not permitted within hazardous lands. There is an opportunity to direct the Zoning By-law to establish suitable general provisions for this use, including minimum habitable space, bicycle parking, and floor area.
Section 5.3.1.12 sets out policies for granny flats, otherwise known as garden suites, where are permitted a temporary use.	These policies should be reviewed against updated policies for additional residential units (ARUs) permitted within a detached structure to provide clarity.	<ul style="list-style-type: none"> The <i>Planning Act</i> has been updated to consider that two ARUs be contemplated on lots in conjunction with single detached, semi-detached, and townhouse dwellings. 	Housing	<ul style="list-style-type: none"> It is recommended that this policy be consolidated with Section 7.4.5.3 – Garden Suites. See policy directions related to additional residential units for further information.
Section 5.3.1.12.1 establishes policies for secondary dwelling units.	There is a need to review and update policies regarding Additional Residential Units (ARUs). ARUs, a Provincial term, refers to additional dwelling units that are within an accessory building or are contained entirely within a single detached, semi-detached, or townhouse dwelling.	<ul style="list-style-type: none"> The <i>Planning Act</i> has been updated to consider that two ARUs be contemplated on lots in conjunction with single detached, semi-detached, and townhouse dwellings. 	Housing	See policy direction associated with Policy 3.3.4.7.1. It is recommended that this section be consolidated with other policies related to ARUs.

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Section 5.3.1.14 establishes policies for agriculturally related commercial and industrial uses. These uses are permitted in Settlement Areas, and rural Industrial and Commercial lands (outside of settlement areas).	There is an opportunity to review the policies for these uses. There is also an opportunity to consider revising the terminology to reference ‘agriculture-related uses’ to align with Provincial policies and guidelines.	<ul style="list-style-type: none"> – The PPS permits agriculture-related uses within prime agricultural areas (Section 2.3.3.1). – The Guidelines for Permitted Uses in Prime Agricultural Areas provide examples of agriculture-related uses, as well as criteria to ensure that they are compatible with and do not hinder surrounding agricultural operations. 	Agriculture	<ul style="list-style-type: none"> – It is recommended that this section be renamed “Agriculture-Related Commercial and Industrial Uses”. – There is an opportunity to require agriculture-related uses to be subject to site plan control. – It is recommended that this section be revised to include reference to Minimum Distance Separation. – The list of uses permitted in this section should be expanded to include additional agriculture-related uses. This could include farm micro-breweries/distilleries and farmers markets.
Section 5.3.2 establishes policies for the Natural Heritage designation in the rural area. The Natural Heritage mapping is included as an overlay in the rural area over the underlying agricultural land use designation.	<p>There may be a need to review and update the policies and mapping for the natural heritage system.</p> <p>There is an opportunity to clarify that existing agricultural uses are permitted to continue within or adjacent to natural areas and natural hazards.</p>	<ul style="list-style-type: none"> – The PPS requires a natural heritage system to be established per Section 2.1.3. – The MNHSS recommends that official plan policies be updated to encourage protecting the natural heritage system, in lieu of singular features. The MNHSS provides a strong basis to inform policy and mapping updates the in SCOP. – Wetlands are deemed to be “Provincially Significant” if they meet the criteria of the Ontario Wetland Evaluation System and are confirmed by the Ministry of Natural Resources and Forestry. Municipalities may also define and identify locally significant wetlands, including those wetlands that may not have been evaluated. 	Natural Environment & Climate Change	<p>The policies of Section 5.3.2 will be consolidated into a new “Section X.X – Natural Heritage System & Hazards” policy. See policy directions associated with Section 4.3.6 for further policy directions.</p> <p>Specific Rural Area Directions</p> <ul style="list-style-type: none"> – Certain features, such as Provincially Significant Wetlands, will explicitly prohibit development or site alteration – including agriculture; however, much of the remaining NHS (e.g., woodlands) will be within an overlay. Given the porous nature of agricultural areas, it is common practice to only designate linkages and enhancement areas at the time of development applications – Consideration could also be given to allowing designation of linkages and enhancement areas at the time of a settlement area boundary expansion under a Municipal Comprehensive Review – Clarity can be added to the SCOP to reiterate that further study and confirmation of the boundary of features prior to the approval of development applications and site alteration will be required but does not prevent existing agriculture / farm uses from continuing.
Section 5.3.4 and 5.3.5 establish policies for the commercial and industrial uses in the rural area.	There may be an opportunity to clarify the naming of this designation (e.g., Rural Industrial, Rural Commercial) to improve interpretation of the SCOP and distinguish these two designations from the commercial and industrial	N/A	General	<ul style="list-style-type: none"> – It is recommended that the commercial and industrial designations within the rural area be renamed Rural Commercial and Rural Industrial, respectively. This will help distinguish between the commercial designations within the settlement areas.

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	designations within the settlement areas.			
Section 5.3.3.5, 5.3.4.2, and 5.3.5.3 establishes servicing policies for Hamlet, Commercial, and Industrial designations in the rural area.	There may be an opportunity to review the servicing hierarchy for the rural area.	<ul style="list-style-type: none"> The Servicing Capacity and Constraints Study may provide recommendations for servicing in the rural area. The draft County OP permits individual on-site sewage services and water services for infilling and minor rounding out of existing development. 	Infrastructure	Awaiting Servicing Capacity & Constraints Study
Section 5.4 establishes policies for roads and highways in the rural area.	<p>There is a need to review and update the Municipality's road network and associated policies for the new planning horizon and to address themes such as rural cycling routes.</p> <p>There may also be an opportunity to revise Table 3 which sets out the road design widths for the road hierarchy (i.e., local, arterial, and collector roads).</p>	<ul style="list-style-type: none"> The PPS directs municipalities to plan for transportation systems to be safe, energy efficient, facilitate the movement of people and goods, and meet projected needs (Section 1.6.7). The Transportation Master Plan may provide updates to roadway widths and road classifications. 	General	<ul style="list-style-type: none"> It is recommended that this policy be consolidated with the general transportation policy section of the SCOP.
New policy opportunity.	<p>Through the Municipality's previous OP Review (OPA #5), policies pertaining to green energy (e.g., commercial wind energy and small-scale wind energy systems) were removed from the SCOP in accordance with the <i>Green Energy Act</i>.</p> <p>There is an opportunity to consider the need to permit or guide development of energy systems. Further, there is a need to consider green energy policies.</p>	<ul style="list-style-type: none"> The PPS indicates that planning authorities should consider providing opportunities for development of energy systems to meet current/future needs (Section 1.6.11.1). The <i>Green Energy Act</i>, which previously removed municipal authority to regulate green energy infrastructure in order to promote its development, was repealed by the Province. 	Natural Environment & Climate Change	<ul style="list-style-type: none"> There is an opportunity to promote alternative energy systems (e.g., wind, solar) through both private development and municipal initiatives There is an opportunity to support and encourage the introduction of electric vehicle charging infrastructure. Policy can also provide clarity for how this infrastructure is situated in the public realm.
New policy opportunity.	There is an opportunity to create policies to encourage the development of broadband services in the rural areas of the Municipality.	<ul style="list-style-type: none"> The <i>Supporting Broadband and Infrastructure Expansion Act</i>, 2021 outlines the Province's commitment to expand broadband access in Ontario in part 	Pandemic Recovery	<ul style="list-style-type: none"> It is recommended that policy be added to the proposed Section 2.2 as it relates to supporting broadband access. There is an opportunity to including policy that directs, where feasible, broadband infrastructure to be installed during road

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	This has become an emerging gap in light of the COVID-19 pandemic.	<ul style="list-style-type: none"> through coordination with municipal and provincial infrastructure projects. The PPS encourages efficient and coordinated communications and telecommunications infrastructure (Section 1.7.1) The Draft County Official Plan requires the installation of broadband infrastructure within new developments (Section 2.4.3) 		construction/reconstruction and other major development activities (e.g., major subdivisions). This includes encouraging co-location on shared towers and structures, wherever possible.
Chapter 6: Land Use and Development Sensitivity Areas				
Section 6.1 establishes policies for hazard lands, such as those lands within the floodway or flood fringe.	There is a need to plan for the effects of climate change on natural hazard risks, such as flooding and erosion.	<ul style="list-style-type: none"> The PPS outlines policies which emphasize the avoidance of natural and human-made hazards and directs development away from areas where there is a risk to public health and safety or property damage, and not create a new or aggravated hazard (Section 3.0). Within the context of the PPS, natural hazards include hazardous lands, flooding hazards, erosion hazards, dynamic beach hazards, and wildland fire. Natural Hazards form part of the County's OP Natural System, and includes steep slope hazards, unstable soils, and fill regulated areas. Within Natural Hazards, development is not prohibited, and there is a need to protect these features from incompatible land uses (Section 2.2.1.3) 	Natural Environment & Climate Change	<ul style="list-style-type: none"> It is recommended that this section be renamed to "Section 6.1 – Hazardous Lands" to reflect the terminology of the PPS. There is a need to review and confirm the mapping of natural hazards and floodplains with the SCOP.
Section 6.2 establishes policies for source water protection, and notes that the once the Source Protection Plans are approved and in effect, that the SCOP may be amended to reflect new policies and land use schedules.	<p>Provincial policies regarding protection of drinking water sources have evolved and there is a need to ensure the Municipality's Official Plan is up to date.</p> <p>There are no municipal drinking water sources in Strathroy-Caradoc that are regulated by a Source Protection Plan. The Lake Huron Primary Intake, which services</p>	<ul style="list-style-type: none"> The Thames-Sydenham and Region Source Protection Plan, prepared per the <i>Clean Water Act</i>, includes recommended policies and directions to be incorporated into Official Plans. Section 2.2 of the PPS directs municipalities to protect, improve, or restore the quality and quantity of water. The Middlesex County Source Protection Plan Implementation Report (2017) 	Natural Environment & Climate Change Infrastructure	<ul style="list-style-type: none"> It is recommended that the draft policies of the Middlesex County Source Protection Plan (2017) be integrated into the SCOP. The draft policies propose to delete Section 6.2.2 as they relate to source water protection, and work to enhance the policies of Section 6.2.1 as they relate to the protection of water resources. These policies are intended to bring the SCOP into conformity with the PPS and recognize the completion of the Source Protection Plan.

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	Strathroy-Caradoc, is not regulated by a Source Protection Plan.	<p>identifies that there are Highly Vulnerable Aquifers (HVAs) and Significant Groundwater Recharge Areas (SGRAs) within Strathroy-Caradoc. The approach to mapping HVAs and SGRAs, per the Report, needs to be confirmed with the Municipality as part of this OPR.</p> <ul style="list-style-type: none"> Source Protection policies will be addressed as part of the County's OP review. 		
Section 6.3 sets out policies for lands adjacent to railways. Section 6.4 sets out policies for lands adjacent to expressways.	There may be an opportunity to review the policies against the 2013 Guidelines for New Development in Proximity to Railway Operations to ensure development in proximity to railways is sufficiently addressed.	<ul style="list-style-type: none"> The 2013 Guidelines for New Development in Proximity to Railway Operations helps guide new development in proximity to railways. The guidelines propose building setbacks, noise and vibration influence areas, security fencing and warning clause guidelines. Transportation Master Plan recommendation #6 is to update or introduce railway crossing policies to consider standards and measures that minimize road-rail conflict wherever possible. 	General Infrastructure Complete Communities	<ul style="list-style-type: none"> It is recommended that these sections be consolidated into the Transportation policies section. There is an opportunity to introduce a policy directing for studies to be undertaken for certain railway crossings in the Municipality to determine if grade separation should be contemplated.
Chapter 7: Implementation and Interpretation				
Section 7.2.2 provides clarification around how land use and settlement area boundaries are to be interpreted.	The policy suggests that boundaries defined by roads, railways, or similar physical features shall be absolute; however, there are instances where land use and settlement area boundaries are defined by lot lines. There is concern that the current definition can be used to expand the settlement areas without an amendment to the plan and expand development where it is not encouraged.	<ul style="list-style-type: none"> The PPS now permits settlement area adjustments outside of a comprehensive review (Section 1.1.3.9). 	Growth Management	<ul style="list-style-type: none"> The SCOP should provide criteria for proposals to adjust the settlement area boundary outside of a comprehensive review. This may be included in a new subsection. At a minimum, the criteria will include: <ul style="list-style-type: none"> That the adjustment would not result in a net increase of land within the settlement area(s); The adjustment would support the Municipality's ability to meet intensification and redevelopment targets established in the OP; Prime agricultural policies are addressed; and, The settlement area to which the lands would be added is appropriately serviced and there is sufficient reserve infrastructure capacity to service the lands.

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	This policy also prohibits settlement area boundary expansions outside of a comprehensive review proves.			– Consideration can be had to move policies related to settlement area boundary expansions to the current Section 1.5 of the SCOP.
Section 7.3.1 notes that the conversion of lands within Employment Areas to non-employment uses may be permitted through a comprehensive review.	No direction is provided with respect to how subject employment land sites of interest within Employment Areas (i.e., non-employment development applications) are to be evaluated from a planning and economic standpoint for conversion to a non-employment use.	<ul style="list-style-type: none"> Sections 1.3.2.4 and 1.3.2.5 of the PPS, 2020 provide direction on the justification for an employment conversion through a comprehensive review, and the specific circumstances under which employment areas can be converted to non-employment uses <i>outside</i> a comprehensive review. The County OP directs the local municipal Official Plans to establish conversion criteria. Employment Lands Study Recommendations: <ul style="list-style-type: none"> #8 recommends establishing Official Plan policies to protect urban employment areas, including an employment area conversion framework. 	Growth Management Complete Communities	– It is recommended to develop policy articulating an approach to evaluating requested conversions on employment lands in collaboration with the County of Middlesex. This evaluation approach should establish criteria that is consistent with PPS policy 1.3.2.5., supports County OP and SCOP objectives and includes site-specific factors such as location, site size, configuration, marketability and future expansion potential.
New policy opportunity	Effectively accommodating urban employment and commercial land development over the longer term requires the implementation of programs and mechanisms to accurately receive, catalogue and assess industrial development information, as well as to assess the available supply of urban employment lands within the Municipality.	<ul style="list-style-type: none"> Employment Lands Study recommendation #9 recommends undertaking regular and ongoing monitoring of urban employment area land supply and demand to assist with longer-term land-use planning and land needs. Regional Commercial Systems Study recommendation #6 recommends undertaking regular and ongoing monitoring of commercial area land supply and demand. County OP policy 4.2 directs that a program be instituted to monitor, among other thing, the availability of land for commercial and employment purposes. 	Growth Management Complete Communities	<ul style="list-style-type: none"> It is recommended to add new policies planning for tracking and monitoring Urban Employment Area and commercial land supply and demand data, in accordance with the County of Middlesex OP policy on monitoring (policy 4.2) and building on baseline data provided in the Employment Lands Study, to assist with longer-term planning and land-needs forecasting. The following key employment land supply and demand attributes can be tracked: <ul style="list-style-type: none"> Historical land absorption on Urban Employment Area Lands by location, sector and size; Urban Employment Area land supply (i.e., serviced, serviceable and constrained); and Forecast Urban Employment Area land absorption against actual land absorption in Employment Areas.

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				<ul style="list-style-type: none"> – It is recommended to include a policy directing that a comprehensive update to the Employment Lands Study be undertaken every five years at minimum. – Track development enquires and potential issues with the OP policies to ensure the effectiveness of the OP in commercial development which can be reviewed at the next OP review. – It is recommended to include a policy directing that a comprehensive update to the Regional Commercial Lands Study be undertaken every five years at minimum.
Section 7.3.3 requires that the Municipality review its Official Plan every 5 years.	The review timelines established in the SCOP do not align with updates to the <i>Planning Act</i> .	<ul style="list-style-type: none"> – Section 26 of the <i>Planning Act</i> now establishes the review timelines for an OP which are ten years after a new SCOP has come into effect and every 5 years thereafter. Section 24 provides limitations on appeals of new and updated official plans. 	General	<ul style="list-style-type: none"> – This policy should be revised to include that new official plans (i.e., repeal and replacement) must be reviewed and revised every 10-years after coming into effect, while the 5-year review cycle for official plan updates (i.e., OPA) remains.
Section 7.4.3.2 establishes policies for cash-in-lieu of parkland.	<p>The policies for cash-in-lieu of parkland may now longer reflect the needs of the Municipality with respect to parkland requirements.</p> <p>There are also multiple references to cash-in-lieu of parkland which may be consolidated into</p>	<ul style="list-style-type: none"> – The Parks and Recreation Master Plan makes recommendations as it relates to the provision of parkland. – Section 51.1 of the <i>Planning Act</i> states that the approval authority may impose as a condition to the approval of a plan of subdivision that land in an amount not exceeding, in the case of a subdivision proposed for commercial or industrial purposes, 2 per cent and in all other cases 5 per cent of the land included in the plan shall be conveyed to the local municipality for park or other public recreational purposes or, if the land is not in a municipality, shall be dedicated for park or other public recreational purposes. – Bill 108 revised Section 37 of the <i>Planning Act</i> to permit municipalities to impose a Community Benefits Charge to pay for the capital costs of facilities, services, and matters related to growth for developments greater than 10 units. 	Complete Communities	<ul style="list-style-type: none"> – It is recommended that the various cash-in-lieu of parkland sections be consolidated under the new Parks and Recreation policy section. – Clarity can be added that cash-in-lieu of parkland payments will be held in accounts to help acquire or develop parkland in accordance with the goals of the SCOP and Parks and Recreation Master Plan. – Parkland cash-in-lieu valuation should be via Section 42 of the <i>Planning Act</i> (day before building permit), as opposed to Section 51.1. This will require a further amendment to the Parkland Dedication By-law.

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Section 7.4.5.3 contains policies which permit garden suites as a temporary use, subject to a temporary use by-law.	These policies should be reviewed against updated policies for additional residential units (ARUs) permitted within a detached structure to provide clarity.	– The <i>Planning Act</i> has been updated to consider that two ARUs be contemplated on lots in conjunction with single detached, semi-detached, and townhouse dwellings.	Housing	– It is recommended that this section be consolidated into the housing policies section of the SCOP.
Section 7.4.6 sets out policies for site plan control.	Agricultural uses are currently exempted from the requirements of site plan control. Site plan control can be expanded to agriculture-related, and on-farm diversified uses to address issues of compatibility. There is an opportunity to consider a scoped/expedited site plan control for agriculture-related and on-farm diversified uses.	– The Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas notes that site plan control may be used to ensure that new uses fit within the agricultural character of the area. This can avoid the need for official plan and zoning by-law amendments.	Agriculture	– It is recommended that Section 7.4.7.1 of the SCOP be expanded to require site plan control for new on-farm diversified uses, agriculture-related uses, and cannabis production facilities.
Section 7.5 sets out policies for complete applications to ensure all materials are received in support of a development application.	New policies can be considered to require pre-consultation with the Municipality and/or peer review of any required studies or reports.	– The <i>Planning Act</i> allows municipalities to require mandatory pre-consultations. The outcome of the pre-consultation is intended to provide clear direction of the studies, reports and drawings that will be required in support of a complete application.	General	– It is recommended that the SCOP require pre-consultation for certain development applications. This policy would apply to all Official Plan Amendment applications and to Zoning By-law Amendment applications within the Strathroy and Mount Brydges Settlement Areas.
Section 7.6 establishes policies for public consultation in line with the requirements of the <i>Planning Act</i>.	There is an opportunity to include new policies related to consultation with Indigenous communities, including the need to confirm the preferred level of consultation. Consideration should be had to ensure this goal applies to participation in environmental management and consultation, cultural heritage, and development application review. Consideration may be had to re-naming this section to a broader "consultation" or "engagement and participation" section. There is an opportunity to consider revising language to reflect changes	– The required contents of an Official Plan are set out in Section 16(1) of the <i>Planning Act</i> and include a description of the measures and procedures for informing and obtaining the views of the public for Official Plans/Amendments, Zoning By-laws, Plans of Subdivisions, and consents. – The PPS encourages planning authorities to build constructive and cooperative relationships through meaningful engagement with Indigenous communities to facilitate knowledge-sharing in land use planning processes. Section 1.2.2 requires planning authorities to engage with Indigenous communities. Section 2.6.5 requires planning authorities to engage with Indigenous communities and consider	General Pandemic Recovery	– This section should be updated to reflect the requirement to engage and partner with Indigenous communities and consider their interests when identifying, protecting and managing cultural heritage and archaeological resources, as well as environmental protections. – This section should be revised to encourage the organization of additional public meetings or similar events above the requirements of the <i>Planning Act</i> . – This section should be revised to recognize the role of virtual engagement and consultation in the Municipality, and opportunities to conduct 'hybrid' in-person engagement. – Specific consultation requirements for various <i>Planning Act</i> applications are required to be included in Official Plans. Currently, Section 10.19 addresses consultation requirements broadly for planning applications. To ensure consistency with the

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	due to the COVID-19 pandemic, such as virtual consultation and other online communication tools. There is also an opportunity to specify different means of engagement and requiring public consultation (e.g., open houses) for certain development applications.	their interests when identifying, protecting and managing cultural heritage and archaeological resources.		Act, consultation requirements for subdivisions, OPAs, ZBLAs and consents should be explicitly identified at a minimum.
Glossary				
This sections contains definitions for key terms used throughout the Official Plan.	It is anticipated that several new definitions will be required based on updates to other policies of the SCOP. Some existing definitions will require updates to ensure align with Provincial and County policies and to modernize the SCOP. Throughout the SCOP, there is also an opportunity to bold defined terms to indicate that a term is defined in the glossary.	<ul style="list-style-type: none">– The PPS includes many new and updated definitions (e.g., on-farm diversified uses, agriculture-related uses).– New terminology has been introduced under the <i>Planning Act</i>.	General	New Terms to Be Defined <ul style="list-style-type: none">– On-Farm Diversified Uses– Agriculture-Related Uses– Agri-Tourism– Additional Residential Unit– Affordable Housing– Attainable Housing– Special Needs Housing– Major Retail Terms to be Revised <ul style="list-style-type: none">– Natural Heritage Features and Areas– Granny Flat

5.2 General Housekeeping Updates & Opportunities

While a primary objective the Official Plan Review is to respond to recent Provincial and County policies, and the outcomes of the Growing Together Master Plans and Studies, there is also an opportunity to address other general updates and housekeeping updates. These might include any technical errors or omissions, grammatical errors, updating outdated terminology, and ensuring that the Official Plan is user-friendly. Certain references throughout the Official Plan, such as the preambles for the different land use designations may require modification to reflect current conditions (e.g., the preamble for Section 3.3.2 references a development which is ‘under construction’).

Preparing an updated Official Plan also presents an opportunity to re-visit the overall structure of the Official Plan and consider changes to streamline interpretation and improve the overall readability of the document. As such, the following changes and directions have been identified for implementation in the Red-Lined Official Plan:

General Housekeeping Strategic Directions	Direction for the Red-Lined Official Plan
The Official Plan cover page will need to be updated to reflect the revised planning horizon and updated map.	A new cover page will be prepared for the Official Plan.
The Table of Contents should be hyperlinked to various sections of the Official Plan, recognizing that the document is predominantly accessed online. The styles of the section headings should be revised to improve readability and incorporate the section heading within the header bar at the top of the page. Sub-section heading font sizes/styles should be revised to distinguish between the third and fourth levels of headings (e.g., 3.3.1 and 3.3.1.1) to improve readability.	The Table of Contents will be hyperlinked to various sections of the Official Plan. This will require the application of new heading styles throughout the Official Plan. There is also an opportunity to introduce a new policy that permit minor spelling/grammar errors and numbering issues without the need for an Official Plan Amendment, provided the intent of the policy is not changed.
References to gendered language should be revised (e.g., “Where development is proposed in ‘Hazard Land’ areas, the proponent may be required to undertake, at his expense...”).	All references to gendered language will be removed and re-worded throughout the Official Plan.
Where possible, italics should be removed from the document to improve document accessibility in accordance with the <i>Accessibility for Ontarians with Disabilities Act</i> (AODA).	All italics will be removed from the Official Plan, with exception references to Act and legislation (e.g., the <i>Planning Act</i>).
The mapping / schedule template can be made consistent between the various Schedules and Figures.	The mapping and schedule template will be revised.
There is an opportunity to identify and consolidate policies that apply to both Mount Brydges and Strathroy. There is an opportunity to establish a consolidate section of ‘policies for specific uses’ which provides additional detailed policy guidance for certain types of land uses. For example, there are several instances of policies for home occupations for each land use designation that could be consolidated into one section to improve readability and streamline future OP edits.	Table 1 of this Report proposes several changes to streamline the Official Plan and consolidate policies, where applicable.
There is an opportunity to add a ‘preamble’ section to the Official Plan which serves as a user-guide to the document and support interpretation of the policies.	A preamble section can be added to the Official Plan which provides an overview of the organization of the document.

6 Official Plan Review Next Steps

The Policy Conformity and Directions Report is the second deliverable of Phase 2 of the Official Plan Review and identifies the areas in which the Official Plan will be updated to address issues, gaps, and conflicts. This section provides an explanation of the next steps moving through Phase 2 into Phase 3 of the project.

Consultation

A public open house will be held in November 2021 with members of the community to present the findings of the Policy Conformity and Directions Report and to seek feedback on the proposed changes and further directions to be considered. Additionally, meetings will be held with the Technical Advisory Committee and Stakeholder Advisory Committee to seek their focused input on the Report. The final draft Policy Conformity and Directions Report will be presented thereafter to Council, for endorsement.

Red-Lined Official Plan

A red-lined version of the Strathroy-Caradoc Official Plan, which corrects any technical errors or omissions, and implements the policy directions outlined within this Report will be prepared. This document will be used for further public and stakeholder consultation.

An Official Plan Amendment will be prepared in 2022 for consideration for adoption by Council as part of the Municipality's Comprehensive Review for further review and comment.