

December 6, 2022

File No.: 568098-7

Ministry of Municipal Affairs and Housing

To Whom It May Concern:

**Re: Flato Developments Inc. (“Flato”)
Part of Lot 11 and 12, Concession 8, South-east corner of Patterson Street and the
9th Line, Fletcher Meadows – Phase 2, Village of Beeton
Simcoe County Municipal Comprehensive Review and New Tecumseth Settlement
Area Expansion**

We are counsel for Flato with respect to the above noted matter. Flato is the owner of lands located adjacent to the Beeton Settlement Area in the Town of New Tecumseth, generally located east of Patterson Street North, and South of 9th Line (the “**Subject Lands**”). A portion of the Subject Lands were rezoned and draft plan approved on October 23, 2019.

On behalf of our client, we respectfully request that the Subject Lands be brought into the settlement area boundary of Beeton in the Town of New Tecumseth, and be designated for residential uses.

On October 11, 2022, the Committee of the Whole received Report CCW-2022-277 (the “**Report**”), with respect to the Municipal Comprehensive Review Project Update and Phase 2 Growth Management Work Plan. The Report addresses County Council’s adoption of Official Plan Amendment No. 7 (“**SCOPA 7**”), which is currently with the Province for approval. The Phase 2 Growth Management work is a continuation of the population work that is captured in SCOPA 7. It was identified in Phase 1 of the Municipal Comprehensive Review (“**MCR**”) that there is a need for additional community area lands in the County.

The Town of New Tecumseth was identified as one of the five municipalities that will require a settlement area boundary expansion through the MCR process, to accommodate the long-term growth that has been allocated as part of SCOPA 7. More specifically, the need to accommodate approximately 448.4 ha by way of settlement area boundary expansion has been identified for the Town of New Tecumseth.

SCOPA 7 includes a hierarchy of settlement areas that identifies Beeton as a *category 2- Settlement Areas that have a delineated built boundary and existing or planned municipal water and wastewater systems*. In addition to this, a population forecast for the Town of New Tecumseth identified a population of 80,590 for 2051 which is a 35,110 population increase from 2021. This population increase will require land for the accommodation of this growth.

Enclosed for your consideration, please find an analysis of the Town’s Draft Settlement Boundary Evaluation Criteria, with the Application of Climate Change Lens, as it pertains to the Subject Lands, prepared by our client’s land use planners at MHBC. Including the Subject Lands within the settlement area boundary provides for the continuation of a complete community, as among other things:

LuatViet ► Fernanda Lopes & Associados ► Guevara & Gutierrez ► Paz Horowitz Abogados ► Sirote ► Adepetun Caxton-Martins Agbor & Segun ► Davis Brown ► East African Law Chambers ► Eric Silwamba, Jalasi and Linyama ► Durham Jones & Pinegar ► LEAD Advogados ►
For more information on the firms that have come together to form Dentons, go to [dentons.com/legacyfirms](https://www.dentons.com/legacyfirms)

1. The Subject Lands are across from Mel Mitchell field, providing ready access to this school and recreational asset;
2. The Subject Lands would provide an opportunity for a secondary north/south collector road from Main Street (County Road 1) to 9th Line, alleviating traffic on Patterson and providing a ready access to Mel Mitchell field for users that are from the east (see attached figure);
3. The Subject Lands are contiguous to the settlement boundary and can be easily serviced;
4. The Subject Lands are within easy walking distance of an elementary school (Monsignor J.E.);
5. The Subject Lands are outside of the Province's Natural Heritage system, and a preliminary natural heritage evaluation has been undertaken on the lands concluding that there are no constraints on development from a natural heritage perspective;
6. The Subject Lands host a municipal drain which can be appropriately accommodated; and
7. Development of the Subject Lands will not contribute to any flood related issues in Beeton.

The inclusion of the lands within the settlement area boundary would result in a logical expansion of the boundary, in an area with existing investments in infrastructure, that would be optimized with development in this area. As well as, the inclusion of the Subject Lands would contribute to the County accommodating projected community growth to 2051.

Again, we respectfully request that the Subject Lands be brought into the settlement area boundary of Beeton in the Town of New Tecumseth, and be designated for residential uses.

Yours truly,

Dentons Canada LLP

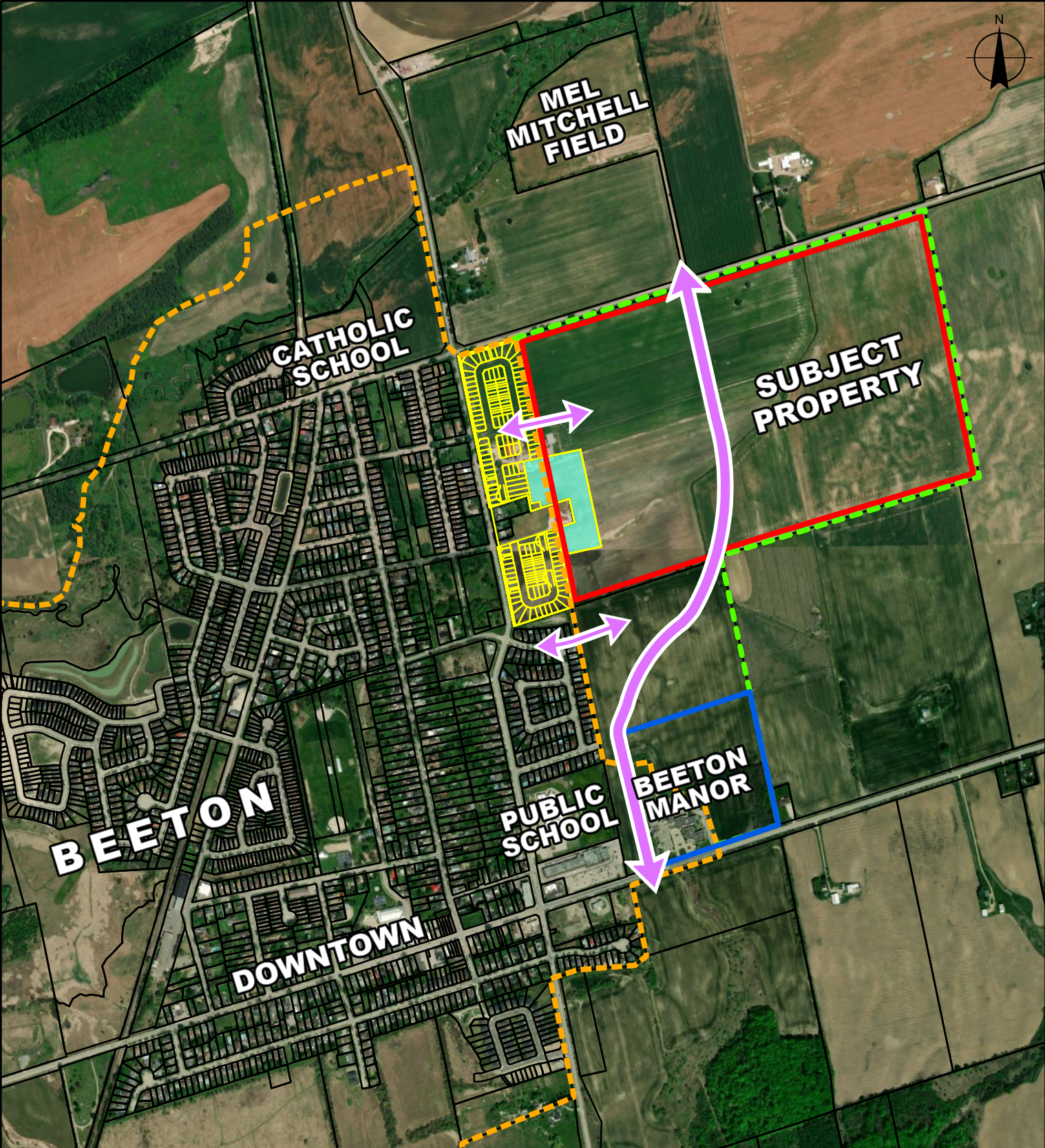


Katarzyna Sliwa
Partner

KS/db

Enclosures

Copy: Client



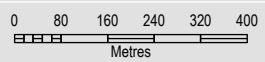
Fletcher Meadows Settlement Expansion Request Figure

LEGEND

- Subject Property
- Settlement Boundary
- SWM Pond
- Fletcher Meadows Approved Draft Plan Lands
- Future Road Connection
- Future Settlement Boundary
- Beeton Manor Expansion

DATE Feb 15, 2022

SOURCES ESRI Land Information Ontario



N:\New Tecumseth\15184\Drawings\Figures\MCR Figures\GIS

Part Lots 11 & 12, Con. 8
Town of New Tecumseth
County of Simcoe



Town of New Tecumseth

FLATO Fletcher Meadows Settlement Boundary Request - Evaluation Criteria with Application of Climate Change Lens

No.	Criterion	Level of Importance	Climate Change Lens	Satisfaction of Criteria
1	Achieves the Town's Official Plan target of 50 people/jobs per hectare in conjunction with the Growth Plan 2051 horizon population and employment forecast	Very Important	Increased compact design will help to lower GHG emissions from buildings and transportation where there are increased forms of denser development in the DGA	Based on the anticipated unit mix of low and medium density ground oriented residential product, it is anticipated that 50 people and jobs/ha is achievable
2	Lands will not result in the Town exceeding Growth Plan 2051 horizon of the approved population and employment forecast	Very Important	Lands are planned to the horizon of 2051 as to not result in urban sprawl onto prime agricultural lands	Based on the land area and the County draft land need assessment, the anticipated population generated will not exceed the 2051 allocated forecast
3	Close proximity to the Primary Settlement Area of Alliston	Very Important	Supports growth centre planning for the community to be transit-supportive, walkable and well serviced to reduce auto dependency and decrease GHG emissions	<p>We acknowledge the site is not adjacent to the primary settlement area of Alliston however while the Growth Plan directs the majority of population be directed to the Primary Settlement Areas it is understood it is Council's intention to still direct growth to the other settlement areas of Beeton and Tottenham.</p> <p>The site is contiguous to the Beeton Settlement Area</p>
4	The three downtowns of Alliston, Beeton and Tottenham are preserved and remain unique	Very Important	Supports walkable downtowns for pedestrians, reduces auto dependency. Also supports use/reuse or redevelopment of existing structures and lands to reduce GHG emissions	The development will not require any alteration to downtown Beeton. The site is within walking and/or cycling distance of downtown. The population produced on the site has the opportunity to provide further support to downtown.
5	New development supports the unique characteristics of the corresponding community	Very Important	Supports use/reuse or redevelopment of existing structures and lands to reduce GHG emissions where development can	The site provides opportunity for active transportation to the community's two schools, recreational areas and downtown. There are no natural heritage

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FLATO Fletcher Meadows Settlement Boundary Request - Evaluation Criteria with Application of Climate Change Lens

			reflect the vernacular characteristics of each community. Preservation of natural heritage features enhances the communities. Protection of farmland between the communities will keep them separate and distinct from one another.	features requiring protection on site. The site does not propose to extend the settlement boundary closer to either Alliston or Tottenham
6	Sufficient identified capacity to service the lands with full municipal water and wastewater within the Growth Plan horizon to 2051	Very Important	Resilient water, wastewater and stormwater management infrastructure will help to mitigate impacts of a changing climate including being proactive to manage severe weather	The municipality is working with the Town of Collingwood to upgrade their water treatment plan and renew the CNT Water Pipeline agreement. Following the expansion, which is currently ongoing, there will be sufficient water supply to Beeton for this and other growth needs. Patterson Street upgrades and the Fletcher Meadows Phase 1 development have accommodated for infrastructure connections to the site sized accordingly to service these lands.
7	Sufficient capacity available for full life cycle cost of facilities and infrastructure, and is financially viable over the full life cycle of these assets	Important	Resilient water, wastewater and stormwater management infrastructure will help to mitigate impacts of a changing climate including being proactive to manage severe weather so that the assets achieve their planned full life cycle and are financially viable	Brand new infrastructure sized to accommodate the proposed expansion have been brought to the site boundary as part of the Patterson Street improvements and the Fletcher Meadows Phase 1 subdivision.
8	Lands are contiguous with existing settlement area boundaries of Alliston, Beeton and Tottenham, and do not contribute to a leap-frogging effect	Important	Planning for compact multi-modal, fully serviced complete communities will mitigate contributing to higher GHG emissions and loss of prime agricultural land by reducing sprawl	The lands are contiguous to the Beeton settlement area boundary.

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9	Promotes a mix and range of housing types for people of all ages and assists the Town with achieving the overall Town intensification target of 40% as identified in the Official Plan	Very Important	Complete communities offer a mix and range of housing and when built in a more compact form help to mitigate GHG emissions	The site is not within the built boundary (given that is slated for consideration for settlement expansion) however, a range and mix of lower density housing types will be provided.
10	Supports the Town's Multi-Modal Transportation Master Plan by being located near existing or planned future transit.	Slightly Important	Supports transit and active transportation for residents to reduce auto dependency and mitigate GHG emissions	<p>The development will provide active transportation and will connect to the sidewalks proposed within Phase 1 of the development, as well as the future sidewalks on Patterson Street and 9th Line. Furthermore, as part of the MMTMP, future Transit routes were reviewed in the Transportation Feasibility Study (HDR, 2019). A route was selected and was implemented as part of the Simcoe County LINX Transit System. Route 5 provides connectivity between New Tecumseth and Bradford West Gwillimbury. Specifically, the route connects Alliston and Beeton via Tottenham Road and 8th Line. The bus stops at Main St & 2nd Street and Main St & Patterson St. This bus stop is an approximate 15-minute walk from the Site.</p> <p>A Town Fixed Route was also endorsed by Town Council in 2019 which would connect Alliston, Beeton and Tottenham. The route would travel through Beeton on Patterson Street and Main Street. While the timeline for implementing this route is still not confirmed, the site would</p>

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FLATO Fletcher Meadows Settlement Boundary Request - Evaluation Criteria with Application of Climate Change Lens

				<p>have pedestrian connections to Patterson Street through the Phase 1 lands. Should a bus stop be contemplated at Patterson St & 9th Line/Lilly St, the site would be within a 10-minute walk of the stop. Additional bus stops may be contemplated along Patterson Street adjacent to the would reduce the walking distance and time.</p> <p>The proposed collector road connection through the site provides opportunity to introduce additional active transportation routes in conjunction with the vehicle route.</p>
11	Within close or reasonable proximity to existing or future public service facilities	Important	Complete communities contain public service facilities to meet the needs of residents and with multi-modal transportation options help to reduce auto dependency and mitigate GHG emissions	The site is in close proximity to various public service facilities such as Mel Mitchell field, Beeton dog park, the fairgrounds, Beeton Community Centre, fire station and paramedic station.
12	Proposed developable lands are not located within natural heritage features or areas of natural heritage significance, and not within areas identified as environmentally protected within the Town's Official Plan	Very Important	Protection of the Natural Heritage System features will help to mitigate climate change impacts as this system functions as a valuable carbon sink	The site is not located within the Provincial Natural Heritage System, nor the Town's Natural Heritage System and based on a preliminary natural heritage assessment, there are no features requiring natural heritage protection on the site.
13	Developable lands on designated Rural lands in the Town's Official Plan compared to being located on Prime Agricultural lands	Very Important	Supports the emphasis placed on the importance of protecting valuable prime agricultural lands to support food and economic	The site is on agriculturally designated lands as is the case with much of the lands surrounding the three settlement areas within New Tecumseth.

Town of New Tecumseth

FLATO Fletcher Meadows Settlement Boundary Request - Evaluation Criteria with Application of Climate Change Lens

			resilience	
14	Complies with Minimum Distance Separation (MDS) to existing livestock facilities	Slightly Important	Supports the emphasis placed on the importance of protecting valuable prime agricultural lands to support food and economic resilience	No residential uses are proposed within the MDS area of any existing livestock facilities.
15	No adverse effects on the agri-food network	Slightly Important	Supports the emphasis placed on the importance of protecting valuable prime agricultural lands to support food and economic resilience	The site is contiguous to the settlement boundary, is separated from agricultural uses in the area, has frontage on 9 th Line (a future arterial road designed to accommodate larger volumes of traffic) and is likely to generate little traffic on the boundary road network outside of the settlement area.
16	Meets the policy intent of the Town Official Plan	Important	Supports all climate change factors including growth management, servicing infrastructure, transportation, agricultural and natural heritage system	The site will be designed to conform to the policy intent of the Official Plan