

December 8, 2022

File No.: 568098-1

To Whom It May Concern:

**Re: Sugar Meadows Inc. (“Sugar Meadows”)  
1159 – 1265 Lockhart Road, Town of Innisfil, County of Simcoe  
County of Simcoe Official Plan Review – Settlement Area Boundary Update, Town of  
Innisfil, Simcoe County (the “County”)**

We are counsel for Sugar Meadows with respect to the above noted matter. Sugar Meadows is the owner of approximately 20.8 hectares of land in the Town of Innisfil, municipally known as 1159-1265 Lockhart Road and legally described as Part of the North Half Lot 22, Concession 10 as in RO691754 (the “Sugar Meadows Lands”). The comments offered herein are provided in relation to the Sugar Meadows Lands, and the adjacent lands to the east, legally described as North Half Lot 23, Concession 10, and Part of the North Half Lot 22, Concession 10 as in RO391806 (collectively, the “Subject Lands”) The Subject Lands are immediately adjacent to the Sandy Cove settlement area boundary, and represent a logical expansion of the settlement area along Lockhart Road. They are not located in the Greenbelt Plan or Oak Ridges Moraine Conservation Plan area.

On behalf of our client, we respectfully request that the Subject Lands be brought into the Sandy Cove settlement area boundary in the Town of Innisfil.

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 and employment 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 employment area lands and community area lands in the County.

The Town of Innisfil 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 for a settlement area boundary expansion has been identified for the Town of Innisfil of approximately 104.2 ha for Community Uses.

The Town of Innisfil identified a population of 84,450 for 2051 which is a 39,740 population increase from 2021. A forecasted employment growth of 30,270 for 2051 was also identified, which is an increase of 20,290 from 2021. This population and job increase will require land for the accommodation of this growth. We ask that the Subject Lands be included in the settlement area boundary expansion.

The Subject Lands are designated 'Agricultural' in the current Simcoe County Official Plan, and 'Agricultural Area' in the Town of Innisfil Official Plan, with a small portion of Key Natural Heritage Features and Key Hydrologic Features. The Town previously considered a Rural designation for the Subject Lands in its 2010 Official Plan, however, an overlay was used to defer the decision. Although the current Our Town Official Plan designates the Subject Lands as Agricultural, there is agreement with both the County and the Town that through the Municipal Comprehensive Review the Subject Lands will be considered for inclusion in the Sandy Cove settlement area boundary and may be considered for development. Sugar Meadows commissioned an Agricultural Land Assessment Report which concluded that the Subject Lands should be excluded from a Prime Agricultural Lands designation and should be designated as rural. A rural designation would make the Subject Lands consistent with other agricultural lands within the County with the same land capability ratings. The existing Agricultural designation in the Simcoe Official Plan, is not appropriate given the capabilities of the lands.

Again, we respectfully request that the Subject Lands be brought into the Sandy Cove settlement area boundary of the Town of Innisfil.

Yours truly,

**Dentons Canada LLP**



Katarzyna Sliwa  
**Partner**

KS/db

*Enclosure*

Copy: Client



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