



December 20, 2022

Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, Ontario
M7A 2J3

Dear Minister Clark:

**Re: Response to ERO Number 019-61223, County of Simcoe
Ministry File 43-OP-221936, Posted December 5, 2022
Request for the Adjustment to the Settlement Boundary of
Tottenham - Klover Trail Developments Inc. (Tribute Communities)
6370 4th Line, Town of New Tecumseth, County of Simcoe**

I am writing to you on behalf of Tribute Communities ("Tribute") and in response to ERO Posting 019-61223, pertaining to Official Plan Amendment 7 to the County of Simcoe Official Plan.

Tribute Communities are the owners of lands immediately abutting, and east of the existing Settlement Area boundary of Tottenham, within the County of Simcoe. The property is legally described as the South Half of Lot 8, Concession 4, and is municipally known as 6370 4th Line, (the "Tribute Lands"). A portion of the Tribute Lands, consisting of approximately 1.9 ha (4.7 acres), is already located within the Tottenham Settlement Area. The Tribute Lands are shown on Figure 1 below.

The background work completed in support of County OPA 7 recommended that 448 hectares be added to New Tecumseth settlement area boundaries. This background work did not identify specific locations within the Town of New Tecumseth for boundary expansions.

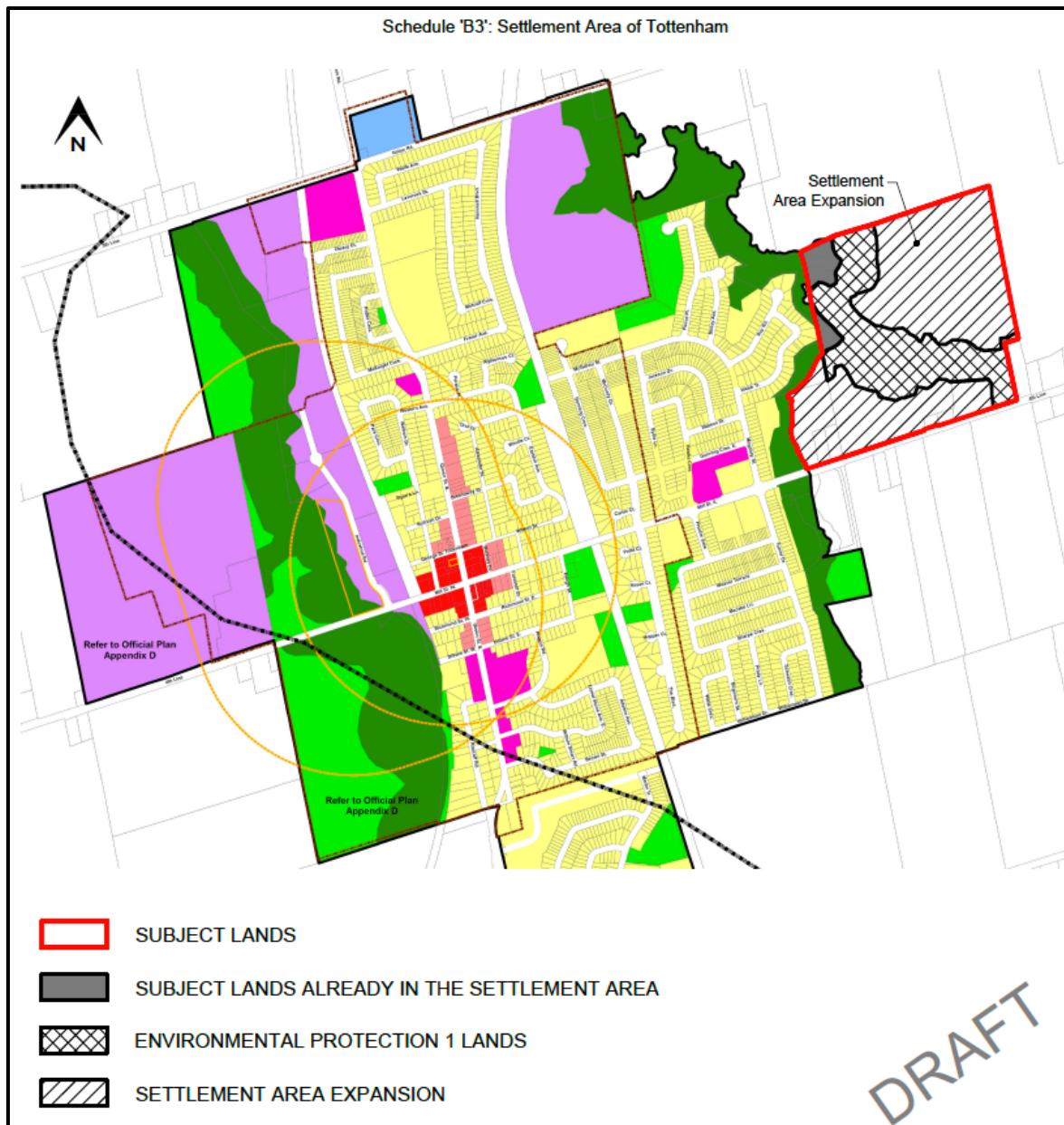
The purpose of this correspondence is to indicate to the Province that Tribute supports boundary expansions within the County of Simcoe generally and more specifically in Tottenham, to include the Tribute Lands. It is our specific request that the Province in making its decision on OPA 7, clearly delineate the expansion areas throughout the County, including the Tribute Lands within Tottenham.

Alternatively, if the Province is not prepared to delineate the specific expansion areas, then we request that the Province approve OPA 7 subject to specific direction to the County of Simcoe to identify the expansion areas, and that

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direction include a specific reference to the inclusion of the Tribute Lands as shown on Figure 1, within the expansion area.

Figure 1: Tribute Lands



Rationale for the Urban Boundary Expansion to Include the Tribute Lands

Based on an analysis undertaken by Hemson Consulting as part of the Simcoe County Municipal Comprehensive Review process, there are insufficient lands within the existing settlement areas in the Town of New Tecumseth to accommodate growth. On behalf of Tribute, a comprehensive Community Area Land Needs Assessment was prepared by urbanMetrics which also found that there were insufficient lands to accommodate growth, and as discussed further below, more than the County's proposed 448 hectares is required in order to accommodate that growth.

It is Tribute's position that the Tribute Lands as noted in Figure 1 should be included within the Settlement Area Boundary Expansion for the following reasons:

A Planning Rationale and Technical Studies have been completed

A planning rationale and technical studies have been completed that support the residential development of the Tribute Lands, including analyses in the fields of civil engineering, natural heritage, agronomy, and land economics. These technical reports were provided to the County of Simcoe and the Town of New Tecumseth in August 2021.

Supporting technical reports include:

- Community Area Land Needs Analysis, urbanMetrics, March 26, 2021.
- Agricultural Impact Assessment, Orion Environmental Solutions, August 3, 2021.
- Technical Servicing Brief, Stantec, August 6, 2021.
- Environmental Conditions Summary, GeoProcess, August 16, 2021.
- Environmental Conditions Report, GeoProcess, March 9, 2022.
- Review of Simcoe County Land Needs Assessment, Parcel Economics, May 20, 2022.

Planning documentation includes:

- Pre-consultation meeting notes, Town of New Tecumseth, October 18, 2020.

- Correspondence to D. Amadio, Manager of Planning, County of Simcoe, January 22, 2021.
- Correspondence to Dan Amadio, Manager of Planning, County of Simcoe, August 25, 2021.
- Correspondence to Town of New Tecumseth - B. Hoppe, General Manager of Infrastructure and Development, R. Vatri, Director of Engineering, J. Best, Director of Planning and Development, October 6, 2021.
- Correspondence to J. Best, Director of Planning and Development, Town of New Tecumseth, and D. Amadio, Manager of Planning, County of Simcoe, March 1, 2022.
- Correspondence to J. Best, Director of Planning and Development, Town of New Tecumseth, November 21, 2022.

The technical reports and planning documentation can be accessed at:

<https://drive.google.com/drive/folders/12jrSt4r48iwCWRVfcT32W7-OPD2tYhCd?usp=sharing>

Hard copies of all technical reports along with a USB Drive have been provided to the Ministry.

New Tecumseth Land Needs

A comprehensive Community Area Land Needs Assessment was prepared by urbanMetrics in April 2021 that provided a market-based housing needs assessment for New Tecumseth that was based on historical development trends. The report prepared by urbanMetrics identified the need for a settlement area boundary expansion of at least 617 hectares in New Tecumseth to accommodate population and employment growth to 2051 based on existing intensification targets. This exceeds the 448.4 hectares identified in OPA No. 7. Therefore, the settlement area boundary expansion in OPA No. 7 would result in land shortages that could lead to affordability issues in New Tecumseth.

The report prepared by urbanMetrics also identified that there was not sufficient land within the existing built-up area to accommodate the 37% intensification target included in OPA No. 7, which was addressed as part of submissions to the County. Based on a reasonable intensification target of 15%, which exceeds the historical intensification rate of 7%, a settlement area boundary expansion

of as much as 1,168 hectares would be needed in New Tecumseth to accommodate future growth.

Tottenham is a candidate community for settlement boundary expansion

Tottenham is a fully serviced community and is identified in the Town of New Tecumseth Official Plan (2019) as one of the three settlement areas in the Town where future growth will be accommodated. Existing public services in Tottenham include schools, commercial shopping areas, a community and fitness centre, municipal parks, a place of worship, library, fire station and a large recreational area (Tottenham Conservation Area). The expansion of the Tottenham Settlement Area boundary to include the Tribute Lands would result in additional resident support of the local economy and the optimization of the public investment in these community facilities. Further, based on the Community Area Land Needs Assessment prepared by urbanMetrics, there is not a sufficient supply of residential lands available in the Tottenham Settlement Area to accommodate the forecast population growth to 2031. Therefore, a Settlement Area boundary expansion is required prior to 2031 to accommodate this forecast population growth and avoid housing shortages.

Based on the detailed information prepared by Tribute's consultants, at least 500 residential units can be accommodated on the Tribute Lands.

Tribute has actively participated in the County of Simcoe's Municipal Comprehensive Review process, including the provision of numerous detailed reports which make it clear that not only should the Tottenham settlement area be expanded, but that it should be expanded to include the Tribute Lands. In line with the Province's recently released *Housing Task Force Report*, the inclusion of the Tribute Lands in the Tottenham settlement boundary will assist in addressing Ontario's housing crisis by providing housing sooner, and with residential densities that respond to the demonstrated need, as well as the opportunity to provide attainable housing.

Based on preliminary planning, the Tribute Lands could accommodate approximately 500 residential units equating to 1,500 persons and 60 jobs, thereby achieving a density of approximately 78 persons and jobs per hectare, which exceeds the minimum density targets set by both the Province of Ontario and the County of Simcoe. A range and mix of housing types that are attainable could be provided within that density.

The Tribute Lands can be efficiently serviced with municipal water and sanitary sewers

Technical Servicing reports prepared by Stantec Consulting, demonstrate that the Tribute Lands can be efficiently serviced through the extension of existing sanitary sewers and watermains, and that there will be sufficient capacity in planned infrastructure for Tottenham. Based on the Stantec analysis, there is sufficient reserve capacity in the existing Tottenham wastewater system to accommodate the Tribute Lands. The interconnection of water supply projects (Collingwood-Alliston-Beeton-Tottenham) are currently under construction and upon completion in 2025, there will be sufficient reserve capacity in the Tottenham water supply system to accommodate the Tribute Lands. The inclusion of the Tribute Lands in the settlement area boundary will ensure that this public investment in infrastructure is utilized.

No impact to natural heritage features

The Tottenham settlement area (as well as the Tribute Lands) are unaffected by the Provincial Greenbelt Plan (2017). Additionally, the Tribute lands are not designated as part of the Natural Heritage System per the Growth Plan. The environmental work, including an Environmental Impact Study, completed by GeoProcess, has concluded that development can proceed without impact to Species at Risk or key natural heritage features or functions.

An Agricultural Impact Study has been completed

An Agricultural Impact Assessment has been completed, in accordance with the Ontario Ministry of Agriculture, Food and Rural Affairs guidance documents. Recognizing that there is a shortfall of designated residential land in Tottenham, the Agricultural Impact Assessment has determined that there is no ability to provide for urban growth in the Tottenham area without impacting some prime agricultural land. Of the total 38.5 hectares of Tribute's Land, approximately 22.5 hectares is agricultural land and approximately 16 hectares is non-agricultural land. For at least forty years, the property has had no livestock facilities and the Tribute Lands lack any agricultural tile drainage. Moreover, development of the Tribute lands would be in compliance with the Minimum Distance Separation guidelines and does not impact any agricultural infrastructure that supports the area's agricultural system.

Conclusion

Based on all of the work completed by the County of Simcoe and by Tribute, it is clear that there needs to be an expansion of the settlement area boundaries

within the County of Simcoe in order to accommodate growth to 2051 in accordance with Provincial Policy. The population forecasting work completed by Hemson Consulting Ltd. and urbanMetrics both demonstrate that there is an insufficient supply of residential lands to accommodate the forecasted growth within the County generally and in New Tecumseth (Tottenham), specifically.

Tribute supports the addition of lands to the Tottenham settlement area to ensure that proposed growth can be accommodated based on a market-based approach, thereby ensuring that housing will be affordable.

In addition, the work completed by Tribute clearly demonstrates that an expansion of the Tottenham settlement boundary specifically as part of the County's urban boundary expansion to include the Tribute Lands, represents logical and orderly planning. The settlement boundary expansion responds to a clear need articulated by all levels of government (lower tier, upper tier and Provincial) for Urban Residential lands in Tottenham, New Tecumseth, the County of Simcoe, and the Province of Ontario generally.

A decision by the Province to expand the County of Simcoe's settlement area boundaries, including the expansion of the Tottenham Settlement Area to include the Tribute Lands, will assist both the Town, the County and the Province in accommodating the forecasted growth on lands that can be readily serviced with the extension of existing municipal water and wastewater infrastructure. Tribute has done a significant amount of work to ensure that they can proceed with the necessary development applications in short order to ensure that homes can be built on the Tribute Lands in the near term.

Please feel free to contact me if additional information is required.

Sincerely,

A handwritten signature in green ink that reads "Celeste Phillips".

Celeste Phillips, MCIP RPP

Copy:

H. Evans, ADM, Ministry of Municipal Affairs

- R. Amato

- K. Jensen

Tribute Communities

- S. Deveaux

- L. Stocco

N. Westendorp, County of Simcoe

B. Hoppe and J. Best, Town of New Tecumseth