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BY E-MAIL

January 25, 2023

Our File No.: BARWE856

Ms. Hannah Evans

Assistant Deputy Minister
Municipal Services Division
Ministry of Municipal Affairs and Housing
777 Bay Street, 16th Floor
Toronto, ON M7A 2J3
E-mail: hannah.evans@ontario.ca

Dear Ms. Evans:

**Re: County of Simcoe Official Plan Amendment No. 7
Environmental Registry No. 019-6133
Our Client: 453211 Ontario Limited, Township of Severn**

I represent 453211 Ontario Limited and I am writing to object to Simcoe County Official Plan Amendment No. 7 (“**OPA 7**”), which has been posted on the Environmental Registry as number 019-6113.

My client owns a 25 acre parcel (the “**Lands**”) located at 2956 Southorn Road, in the Village of Coldwater, in the Township of Severn, Simcoe County. The Lands are currently designated Settlement Employment Area in both the existing and the new Township Official Plan.

My client is proposing a 93 unit mixed use development that would include seven (7) large lots that would permit a residence and an accessory building to provide a location for local tradesmen such as plumbers, electricians and roofing contractors. There would also be 18 live-work units that could accommodate small businesses such as accountants, freelance workers and graphic designers etc.

The development would also include 49 single detached lots and 19 townhouse lots which can be readily serviced and would assist in addressing the existing housing shortage.

My client objects to the Employment Land Needs Assessment (LNA) contained in OPA 7, as it applies to the Township of Severn. The LNA is the result of The Growth Forecasts and Land Needs Assessment dated March, 2022 prepared by Hensom.

In the original assessment dated March 2022, Hensom determined that Severn could expect employment growth of 796 jobs by 2051. Severn currently has 53 ha of vacant employment land and the employment growth at 20 jobs per hectare would require 40 ha leaving a surplus of 13 ha.

In May 2022 Hemson published a memorandum which among other things made adjustments to Local Employment Land area supply. One of the adjustments was to reduce the vacant Employment land supply in the Township of Severn, to reflect constrained lands along Highway #11. This adjustment was made without the benefit of any additional land use or environmental study.

The Employment Lands in question are located in what is known as The South of Division Road Secondary Plan (Secondary Plan), which had been part of the Township's Official Plan since 1995.

The Secondary Plan provides policies and land use designations for the Lands in proximity to highways #11 and 12 just north of the City of Orillia. The Secondary Plan was supported by a detailed Environmental Inventory Analysis and a Hydrogeological Study.

The Secondary Plan identified land use environmental constraints in the area north of Highway # 11. It also designated lands that were not constrained as Employment Lands. The Secondary Plan was incorporated into the existing Township Official Plan, which was adopted in July 2005 and approved in June 2010.

The Secondary Plan has also been incorporated into the new Township Official Plan which was adopted on November 14, 2022. The Employment Lands and the constraints that were first identified in 1995 are now shown on Schedule "D" of the new Township Official Plan.

The Secondary Plan has also been incorporated into the existing County Official Plan in section 3.7.13 and is shown on Schedule "D". The existing County Official Plan states that these lands in the Township of Severn will be subject to the policies of the Secondary Plan.


Amendment No. 7 to the County of Simcoe Official Plan does not amend or alter section 3.7.13 or Schedule "D", and therefore these Township lands in the vicinity of Highway #11 are subject to and governed by the Secondary Plan.

No rationale, justification or identification has been provided for the Hemson Memorandum to reduce the employment land supply in the Township of Severn. The constraints relied on by Hemson have been properly identified in the Township's Official Plan since 1995 and are already recognized in the County Official Plan.

For these reasons my client objects to the County of Simcoe Official Plan Amendment No. 7 and asks the Ministry to modify the Plan to show the Township of Severn with a 13 ha. surplus of existing vacant Employment Lands.

Yours truly,

DEVRY SMITH FRANK *LLP*



David S. White, Q.C.
DSW/jrg