

# HUMPHRIES PLANNING GROUP INC.

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**Town of Innisfil**  
2101 Innisfil Beach Road  
Innisfil, ON  
L9S 1A1

**Attn: Mary Nordstrom, Manager of Land Use Planning**

**Re: Settlement Area Boundary Expansion Request  
County of Simcoe Municipal Comprehensive Review  
4131 15<sup>th</sup> Line, Town of Innisfil  
Cooks Glen Development CR Inc.**

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Humphries Planning Group Inc. ("HPGI") is the agent and planning consultant for Cooks Glen Development CR Inc, the legally registered owner of the land municipally known as 4131 15th Line in the Town of Innisfil (the "Subject Land").

On August 9, 2021, correspondence was submitted on behalf of the owner requesting consideration of the Subject Land for inclusion in the Settlement Area Boundary for the Town of Innisfil as part of the County of Simcoe's ongoing Municipal Comprehensive Review ("MCR") and Official Plan Review ("OPR"). That correspondence also requested the removal of the Agricultural land use designation applicable to the site. On November 12, 2021, a second correspondence was submitted on behalf of the owner in response to the preliminary findings of the Draft Provincial Agricultural System Mapping Refinement Update Report, prepared by Meridian Planning. The correspondence also requested that the site be prioritized for consideration in further refinements to the Agricultural Systems Mapping as part of the ongoing MCR for purposes of identifying and defining settlement boundary expansion areas and sites for residential growth.

The purpose of this letter is to provide additional comments to the Town and the County in evaluation of the Council endorsed criteria that will be used by Town staff when identifying potential locations for Settlement Boundary expansions in Innisfil.

### **Settlement Area Boundary Criteria**

In accordance with Section 2.2.8.2 of the Growth Plan for the Greater Golden Horseshoe, 2020 (the "Growth Plan"), settlement area boundary expansions may only occur through an MCR where it is demonstrated that:

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- a) *Based on the minimum intensification and density targets in this Plan and a land needs assessment undertaken in accordance with policy 2.2.1.5, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the designated greenfield area:*
  - i. *Within the upper- or single-tier municipality, and*
  - ii. *Within the applicable lower-tier municipality;*
- b) *The proposed expansion will make available sufficient lands not exceeding the horizon of this Plan, based on the analysis provided for in policy 2.2.8.2 a), while minimizing land consumption; and*
- c) *The timing of the proposed expansion and the phasing of development within the designated greenfield area will not adversely affect the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan.*

Similarly, Section 3.5.17 of the Simcoe County Official Plan provides additional guidance for assessing settlement area boundary expansion requests. It states that, Settlement area boundary expansions may occur only in accordance with an approved municipal comprehensive review that is consistent with the growth management study in Section 3.5.8 and where it has been demonstrated that:

- a) *Sufficient opportunities to accommodate forecasted growth contained in Table 1, through intensification and in designated Greenfield areas, using the intensification target and density targets, are not available within the applicable local municipality to accommodate the growth allocated to the municipality pursuant to this Plan;*
- b) *The expansion makes available sufficient lands for a time horizon not exceeding 20 years, based on the analysis provided for in subsection (a) above;*
- c) *The timing of the expansion and the phasing of development within the designated Greenfield area will not adversely affect the achievement of the intensification target and density target, and the other policies of this Plan;*
- d) *Where applicable, the proposed expansion will meet the requirements of the Greenbelt, Niagara Escarpment and Oak Ridges Moraine Conservation Plans;*
- e) *The existing or planned infrastructure and services required to accommodate the proposed expansion can be provided in a financially and environmentally sustainable manner;*
- f) *In prime agricultural areas:*
  - i. *The lands do not comprise specialty crop areas*
  - ii. *There are no reasonable alternatives that avoid prime agricultural areas*

- iii. *There are no reasonable alternatives on lower priority agricultural lands in prime agricultural areas;*
- g) *Impacts from expanding settlement areas on agricultural operations which are adjacent or close to the settlement areas are mitigated to the extent feasible;*
- h) *Compliance with the minimum distance separation formulae; and*
- i) *In determining the most appropriate location for expansions to the boundaries of settlement areas, the other policies of this Plan are applied.*

Using the current Provincial and County land use planning policy framework, the Town of Innisfil has developed its own set of criteria to assist the Town in its assessment of settlement boundary expansion options and requests. The criteria borrow heavily from the upper tier framework and consolidate the theme areas of the Province and County. These criteria have been endorsed by Council and are intended to be used in the future consideration of settlement area boundary expansions as part of Phase 2 of the County's MCR process. This following analysis evaluates the Subject Land and demonstrates how it satisfies the Town's settlement area boundary expansion and is an appropriate location suitable to accommodate growth to 2051.

*Criteria #1: There is a demonstrated need for additional land within a particular municipality given the results of a Land Needs Assessment (LNA) that is being completed at the time of a Municipal Comprehensive Review (MCR).*

The County of Simcoe initiated its Municipal Comprehensive Review (MCR), in 2020 for the purposes of updating the County's Official Plan to manage growth in Simcoe over the next 30 years, to 2051. A key component of the MCR is to determine the most appropriate location for long-term growth and how much land will be required to accommodate the growth. This work is done through a formal Land Needs Assessment (LNA).

In October 2021, the County released the preliminary results of the Lands Needs Analysis prepared by Hemson as part of the County's MCR process. As part of this overall growth to 2051, the County's Draft Land Needs Assessment is allocating a total population of about 85,000 people (growth of 40,000 from 2021-2051) and 26,000 jobs (growth of 16,000 from 2021-2051). The Draft LNA also proposes an intensification target of 35% and a Designated Greenfield Density target of 55 residents and jobs (combined) per hectare for Innisfil. Currently, Innisfil's intensification target is 33% and its Designated Greenfield Area density target is 32 residents and jobs per hectare. Based on the Draft LNA, it results in the need to accommodate 6,360 units in the Town's current Built-Up Area (BUA). Further, according to the County, within the existing Designated Greenfield Area there is a potential housing unit supply of 7,382 units. Based on this unit potential and growth

targets, Hemson has initially determined that Innisfil would need a settlement area boundary expansion of approximately 178 hectares for Community Use lands and has sufficient Employment Area land needs. As such, there is a demonstrated need for additional land within the Town of Innisfil and the inclusion of the Subject Land within the Settlement Area Boundary will assist in addressing the projected Community Use land shortfall and contribute to accommodating the growth target to the year 2051.

*Criteria #2: The expansion does not result in Designated Greenfield Area (DGA) land area capacity that would exceed the 2051 horizon of the Growth Plan.*

The County's draft LNA identifies a land need for urban area expansion of 178 hectares based on a market demand methodology established by the Province. The Subject Property is approximately 68.08 hectares (168.22 acres) in total area. Existing natural heritage features located towards the southern-end of the site, and their associated buffers and setbacks further contribute to a reduction in developable area. The land capacity of the site would not exceed the DGA land area required to meet the 2051 horizon.

*Criteria #3: The expansion area will be informed by applicable water and wastewater master plans and stormwater master plans, as appropriate.*

The community of Cookstown is currently serviced with drinking water from the Lakeshore WTP, through a connection to the Innisfil-BWG water transmission main. The wastewater servicing for the community is provided through a municipal system to the Cookstown Water Pollution Control Plant which is currently at full capacity until recommendations for servicing improvements are implemented. While it is recognized that there are currently servicing constraints in Cookstown that limit future growth within that settlement area, the prospect of wastewater servicing improvements in the future is high pending the completion of a future Environmental Assessment process.

*Criteria #4: The expansion area must be located immediately adjacent/contiguous with an existing Primary Settlement Area or Settlement Area as defined in the Growth Plan.*

The Subject Land is ideally located contiguous to the Settlement Area of Cookstown in the Town of Innisfil. The abutting lands to the west are comprised of the recently constructed Heritage Estates residential subdivision by Belpark Homes consisting of 88 single detached dwellings. The proximity of the site to the existing development within the delineated urban boundary makes it an ideal candidate for expansion as it would

represent a logical and contiguous pattern of development. Contiguous expansion refers to natural and logical extensions and additions to existing settlement areas. Contiguous expansion supports the creation of an orderly and compact built form, reducing the presence of disconnected settlement “patches” away from the urbanized edge and avoiding “leapfrog” development. The expansion of the settlement area boundary to include the Subject Land would facilitate the economical extension of existing services and municipal infrastructure to support new development, once servicing capacity is addressed.

*Criteria #5: The expansion cannot result in land being added to a settlement if that land is situated in another municipality.*

The Subject Land is located wholly within the Town of Innisfil. The Subject Land extends southerly to 14<sup>th</sup> Line which is still under the jurisdiction of the Town of Innisfil. The proposed expansion onto the Subject Land will not result in additional settlement land being partially suited in a bordering municipality.

*Criteria #6: Expansion into a Specialty Crop area and lands subject to the Greenbelt Plan is prohibited.*

The Subject Land is located outside of a Specialty Crop Area of the Towns agricultural land base and outside of the Greenbelt Plan Area boundary.

*Criteria #7: The expansion area will avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the water resource system including the quality and quantity of water.*

The Subject Land contains some drainage features (i.e., fingers) associated with the Innisfil Creek subwatershed. Innisfil Creek begins south of Barrie and flows southerly through Cookstown downstream to the Nottawasaga River. The location of these features on the Subject Land is such that development could occur without any potential negative impacts on existing conditions, including groundwater and stream conditions. The Subject Land is also located outside of the Lake Simcoe Watershed, and therefore the requirements of the Lake Simcoe Protection Plan do not apply.

*Criteria #8: It should be demonstrated how any adverse impacts on the agri-food network including agricultural operations from expanding settlement areas will be avoided and if avoidance is not possible, minimized and mitigated.*

It is acknowledged that where impacts to the Agricultural System cannot be avoided, then recommendations should be provided on how to minimize and mitigate impacts. Where a proposed settlement area boundary expansion has been proposed, mitigation measures will need to be considered to minimize and mitigate impacts to the Agricultural System. Generally, the economic viability of the immediate area surrounding the Cookstown urban boundary from agricultural operations perspective is low, recognizing the surrounding land fragmentation which has occurred over time, particular notable along interfaces with urban development, such as the Subject Land. Additionally, the presence of environmental features and high prevalence of non-farm ownership further reduces the sites' ability to support normal farm practices. As such, the inclusion of the Subject Land in the Cookstown settlement area boundary will have a minimal effect on surrounding operations and would not preclude the ability for existing surrounding farms to continue to operate nor would it reduce the viability of those lands for agricultural purposes.

*Criteria #9: The expansion area complies with the minimum distance separation formulae (MDS).*

A desktop Minimum Distance Separation (MDS) Guidelines analysis was undertaken for the subject lands. A survey of aerial photography determined that there are no livestock operations within 550m of the proposed development, with the closest operation being an unknown livestock type operation at 5633 County Road 27, 900m to the north of the Subject Lands. It is noted that several land uses, including a sensitive land use being the Cookstown Central Public School, lie between the livestock operation and the Subject Land. Per MDS Guidelines, no conflict between land uses is anticipated through settlement expansion and subsequent the development of the Subject Land.

*Criteria #10: Prime agricultural areas are avoided where possible by considering and evaluating alternative locations. Where prime agricultural areas cannot be avoided, lower priority agricultural lands will be used.*

While it is recognized that the Subject Land is located in a Prime Agricultural Area in accordance with the Provincial Land Base, as well as the Agricultural designation of the County of Simcoe Official Plan, it is considered to be lower priority agricultural land due to its location along the outer edge of the Village of Cookstown and immediate adjacency to a newly constructed Heritage Estates Residential Subdivision to the west consisting of 88 single detached residential dwellings located on a public road network. Agricultural lands adjacent to existing non-farm uses generally exhibit a lower agricultural priority due to issues of compatibility and potential conflict.

It is also recognized that the site already benefits from an existing non-farm overlay designation in the Our Place Official Plan. In accordance with Schedule B – land Use of the Town of Innisfil Official Plan, the Subject Land is identified as a ‘Waste Disposal Site’. While there is no further policy direction contained in the Official Plan related to this land use category, it is likely that the site is intended to function similarly to the existing effluent storage ponds (lagoons) located south of 15<sup>th</sup> Line east of the o the Trans Canada Thornton – Cookstown trail. From this standpoint, the Subject Land is already seen to have a reduced agricultural function based on the underlying designation being planned to serve future municipal infrastructure supportive uses.

*Criteria #11: The expansion area is located where development would support achievement of the Town’s density and intensification targets and meets the policy intent of the Town’s Official Plan.*

One of the main objectives of the Growth Plan is to build more compact complete communities to reduce the rate at which land is consumed. Designated Greenfield Areas are lands within Settlement Areas but outside of the Delineated Built-up Areas that have been designated in an official plan for development and are required to accommodate forecasted growth to the 2051 Growth Plan horizon. The minimum greenfield density target for Simcoe County is to be not less than 40 residents and jobs combined per hectare. The “Innisfil-Specific” average greenfield density target is 32 combined residents and jobs per hectare (County of Simcoe Official Plan (2008) – Section 3.5.23). The Subject Land is approximately 68.08 hectares (168.22 acres) in total area. While some of its land area is constrained by natural heritage systems and features, roughly 2/3 of the site (approximately 45 hectares) represents table-land, suitable for development to occur.

By comparison, in 2017 Victoria Street (Cookstown) Developments Inc. submitted an application for Draft Plan of Subdivision (I-T-0508) and related Zoning By-law Amendment 9PDS-065-06, PDS-020-07, PDS-097-07, PDS-100-07, PDS-047-09, DSR-016-13, and DSR-095-160) for their lands located at 0 Victoria Street West in Cookstown. The application proposed the development of 58 residential units, a stormwater block, a parkette and a 20-metre public road on a 6.33 ha. parcel of land. The development produced an overall density of 15.26 units per hectare. The applications were approved by Council subject to a Holding (H) provision until such time as the existing plant capacity is available or new plant upgrades have been undertaken.

In consideration of the size and configuration of the Subject Land, and its associated developable area, settlement area expansion and associated development could support a density that would meet or exceed Provincial and County density targets.

Further, Section 5.6.1 a) of the Our Place Official Plan states that “*New development shall include a full range of housing densities and types to promote development within settlements*” and Section 5.6.1 b) states that “*Diversity of housing and lot type shall be applied within neighbourhoods, and distributed in a balanced fashion to avoid the predominance of a single house or lot type within blocks. The distribution of lot and housing types in neighbourhoods will be configured to create smooth transitions and avoid abrupt massing changes within streetscapes, and unsuitable relationships with existing communities.*” It is anticipated that expansion onto the site would be in substantial conformity to the surrounding area producing both low and medium density residential uses, while achieving the Provincial goal of intensification and compact form, and remaining within the density requirements of the Town Official Plan.

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*Criteria #12: Significant growth will be directed to Alcona, prioritizing the Major Transit Station Area surrounding the GO Station and areas subject to the Alcona South and Alcona North Secondary Plans.*

While it is acknowledged that the large majority of growth will be directed towards the Mobility Orbit and within the urban settlement boundary of Alcona - where the highest concentration of densities is expected to occur - more limited forms of growth located in appropriate areas on the periphery of Village Settlement Areas, such as Cookstown, can also play a secondary role in the County’s growth framework and ensure that Village Settlements continue to expand, evolve and that their function within the Towns settlement hierarchy is maintained.

*Criteria #13: The expansion area has appropriately considered matters related to sustainability and climate change.*

The Subject Lands can be developed in consideration of aspects of climate change adaptation and mitigation strategies. Some key elements include the contiguous expansion of existing settlement areas which reduces the need for uneconomical expansion of infrastructure; Strong connections with existing settlement areas which promotes connectivity, walkability and the full provision of community services and facilities; Avoidance of natural areas to sequester carbon and manage flooding and extreme weather events; Establishment of more compact built form which promote walkable street configurations which support health objectives; The implementation of new green development standards and design.

*Criteria #14: The expansion area would be located to maximize the use of existing infrastructure and public service facilities. The infrastructure and public service facilities needed would be financially viable over the full life cycle of these assets.*

The proposed expansion area is located on the outer edge of Cookstown where existing employment, commercial, public service and recreational uses and opportunities (i.e., school, library, arena, curling club) exist and the necessities of daily living are readily available. The Subject Land benefits from existing municipal infrastructure located along Victoria Street with available connections at the 'doorstep' with capacity issues expected to be resolved through the completion of the Municipal Class Environmental Assessment for the Cookstown Water Pollution Control Plant.

*Criteria #15: The expansion area is located where it can support a range and balance of housing (including affordable housing) and employment options.*

The proposed expansion area is of suitable size to accommodate a broad range of housing opportunities, commercial facilities, recreation, culture, government facilities and services and employment opportunities. It can also support the provision of a diversity of housing in terms of density, tenure, unit size and price including special needs housing.

*Criteria #16: The expansion area will contribute to achieving compact, walkable, sustainable and healthy communities that enhance a sense of place.*

The expansion area can be developed in a manner that new neighbourhoods and communities address the principles of sustainability (i.e., providing a mix of uses, variety of housing forms, walkable communities, transit supportive densities and designs, financial sustainability, attention to detail in the design of the public realm, and respecting natural and cultural heritage) and with a high standard in urban design that will appropriately blend with the existing residential subdivisions to the west.

*Criteria #17: The expansion area adequately protects and avoids development within key natural heritage features and hydrologic features.*

While portions of the Subject Land are located within the Natural Heritage System for the Growth Plan, from a strictly ecological perspective, the inclusion of the site within the Cookstown settlement area boundary would pose no threat to the Province, County and Towns significant features or systems and development would be designed to avoid impact to these areas. Further, where development is proposed to occur adjacent to "Natural Environmental Areas" an Environmental Impact Study (EIS) would be completed to the satisfaction of the Town, in consultation with the County of Simcoe, and the NVCA

to confirm the nature and extent of those features and the application of any associated setbacks or buffers.

*Criteria #18:* The expansion area provides an appropriate rural interface.

The expansion area could be developed with a focus and emphasis on edge planning and implement “best practices” to protect the integrity of the agricultural area and the right to farm. The southernmost portion of the site forms part of the Provincial natural heritage system which would minimize the length of the direct urban/rural interface by implementing a significant and effective natural buffer between future urban development abutting Victoria Street and surrounding rural uses to the south. Further, future development can be laid out based on an understanding of surrounding farming operations and a focus on protecting their integrity.

Based on the analysis above, the Subject Land represents an appropriate location to accommodate Settlement Area Boundary Expansion in the County and Town to accommodate growth to the year 2051. In assessing the Subject Land based on the Towns adopted expansion criteria, it is evident that the site implements the policy objectives for expansion and represents a responsible and sustainable approach to growth and a logical extension to the Cookstown urban boundary. It is our objective to ensure that the Town and County gives due consideration to the Subject Lands when considering candidate areas for boundary expansion.

If you have any questions or concerns, please contact the undersigned at ext. 244 or Jonathan Sasso at ext. 228.

Yours truly,

~~HUMPHRIES PLANNING GROUP INC.~~



Rosemarie L. Humphries BA, MCIP, RPP  
President

cc. Mayor, Deputy Mayor and Members of Council  
Cooks Glen Development CR Inc.  
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