



January 24, 2023

Julianna Zhuo  
Municipal Services Office - Central Ontario  
16th floor  
777 Bay Street  
Toronto, Ontario  
M7A 2J3

**RE: County of Simcoe Official Plan Amendment No. 7 – ERO #019-6113**

The Council of the Town of Penetanguishene received the letter from Steve Clark, Minister of Municipal Affairs and Housing on December 12, 2022, in which comments were sought on the Environmental Registry of Ontario (ERO) post 019-6113. The matter before the Province is concerning the County of Simcoe's Official Plan Amendment No. 7 to implement the Land Needs Assessment Study (LNA) as part of the Municipal Comprehensive Review (MCR). The Town recognizes that the MCR is a complex and detailed process and that the LNA is the most important component of the MCR to move forward with policy creation. It is equally important that the document be accurate and reflect the development potential in Primary Settlement Areas such as the Town of Penetanguishene.

The Council of the Town of Penetanguishene provided comments to the County of Simcoe throughout the MCR process on November 24, 2021, and June 24, 2022, that the Town did not support the increases in density and intensification targets. Furthermore, on January 12, 2023, Council passed the following motion in response to the ERO posting:

- *Request a reduction of the density target to 50 people and jobs per hectare in the Designated Greenfields as per the previous approval. Request a reduction to the intensification target to 40% of new growth in the Built-Up Area as per the previous approval.*
- *That Primary Settlement Areas such as Penetanguishene be exempt from policy 6.3.5 of A Place to Grow: Growth Plan for the Greater Golden Horseshoe, being a policy to require a Municipal Comprehensive Review to redesignate lands designated Rural in a local Official Plan.*

Council continues to be unsupportive of the increase to both the intensification target and the density target being proposed in the LNA and believes that the increase is unwarranted at this time. The LNA report articulates that the current targets are not required to change but that the County may choose to set more ambitious targets to lessen sprawl. It's our position that it's not appropriate to increase targets without demonstrated justification of the need or ability to provide that level of intensification.



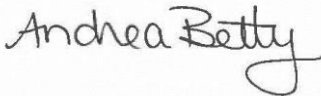
Additionally, we have concerns with abrupt increases in density from the existing urban edge into greenfield lands which have significant impacts on community character, the provision of services such as transit and active transportation opportunities, as well as the ability to manage intensification in proximity to valuable rural land uses which define our community.

Another matter to bring to your attention is policy 6.3.5 in A Growth Plan: A Growth Plan for the Greater Golden Horseshoe (GP) which limits the Town's ability to redesignate lands in the Official Plan from a rural designation to an urban designation. It is our opinion that the policy contradicts the vision of the GP to enable growth in appropriate locations such as Primary Settlement Areas. This policy requires the Town to wait until the next MCR, a County requirement, before redesignating lands to make them available for residential and employment growth. The policy significantly impacts the Town's ability to accommodate growth and limits private investment in our community.

Should you have any questions or wish to discuss this further please do not hesitate to contact the undersigned by email at [abetty@penetanguishene.ca](mailto:abetty@penetanguishene.ca) or by phone at 705-549-7453 ext. 215.

Respectfully submitted,

**THE CORPORATION OF THE TOWN OF PENETANGUISHENE**

A handwritten signature in cursive script that reads "Andrea Betty".

Andrea Betty, MCIP, RPP  
Director of Planning and Community Development

cc: Jeff Lees, CPA, CGA, Chief Administrative Officer