

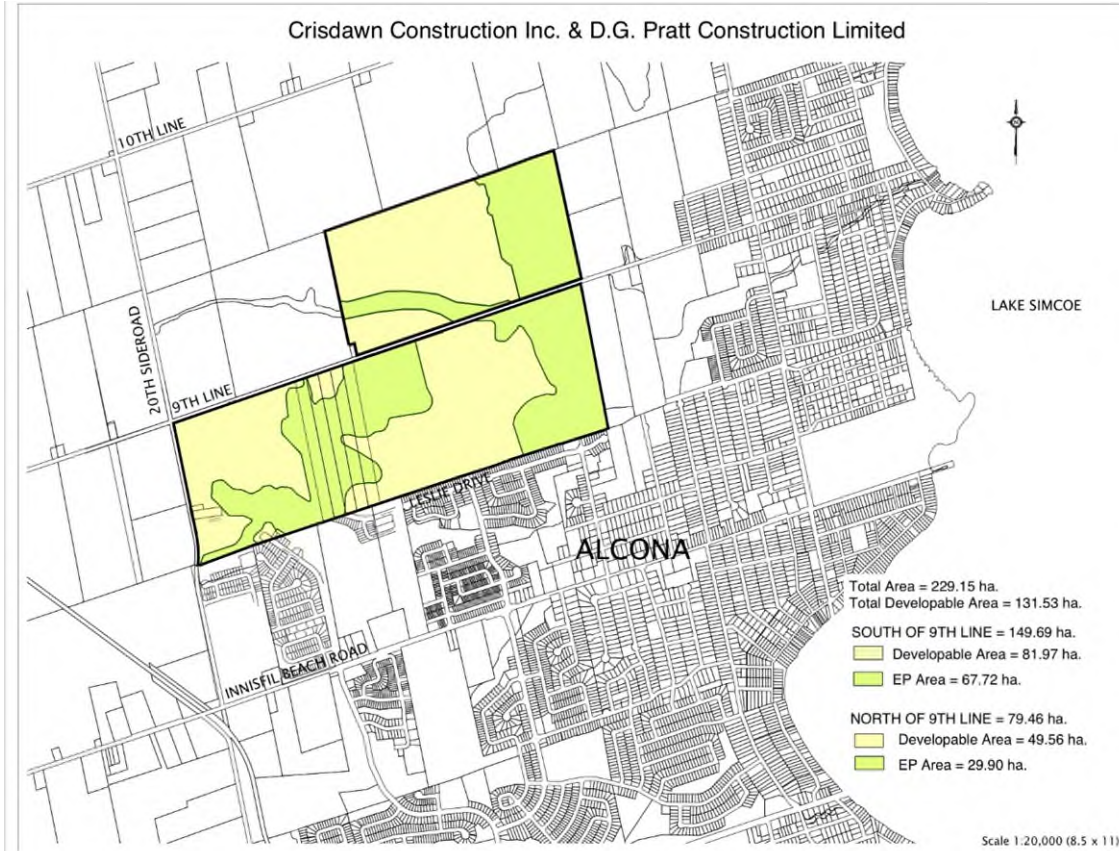
January 30, 2023

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

Dear Minister Clark:

**Re: Simcoe County Official Plan Amendment 7
ERO Posting 019-6113
Ministry Reference Number 43-OP-221936
Request for Modification - Alcona, Innisfil**

We act for Pratt Development Inc. with respect to this matter. Pratt are owner of, or agents for, lands in North Alcona, in the Town of Innisfil. The lands are located as shown in the plan below, and are referred to in this letter as the “Pratt lands”.



Simcoe County has adopted Official Plan Amendment 7 as part of their staged implementation of a Municipal Comprehensive Review, addressing the population forecast and land needs for the County. The amendment does not conform with the Growth Plan for the Greater Golden Horseshoe, and did not properly follow the provincial Land Needs Assessment Methodology. It is now before the Minister for his consideration.

The amendment as adopted does not provide for sufficient population growth, or for sufficient land availability for grade-related housing - which is overwhelmingly the preference of current residents, and based on market-based forecasts, of Simcoe County's future residents. It also does not identify the lands for future settlement area expansion to 2051, leaving this question to later.

The Town of Innisfil and Simcoe County originally adopted and approved the inclusion of much of the Pratt lands as settlement area 14 years ago - which was delayed only by an OMB appeal by the Province. It is long overdue for the Pratt lands to be included in settlement area.

The Town continues to support the expansion of the Alcona settlement area to include the Pratt Lands. It is a priority for the Town that the Pratt Lands be developed for urban uses.

The Minister should modify the Simcoe County Official Plan Amendment 7, by including the lands shown on the above plan in settlement area, and making other modifications found at the end of this submission.

The Minister should also modify the County's adopted Official Plan Amendment 7 to provide for a greater population, and a greater allocation of land for settlement area expansion - particularly in Innisfil and New Tecumseth, which are likely to be the main focus of growth in the future in the County. In the alternative, the population forecasts, the proposed amount of settlement area expansion required by a proper land needs assessment, and the appropriateness of the Pratt lands for settlement area expansion, should be referred to the Ontario Land Tribunal for a hearing.

Simcoe County is an Increasingly Attractive Destination for New Homeowners in the Greater Golden Horseshoe

As housing prices continue to rise, and the supply of family housing is further restricted in Toronto, families continue to move out seeking their first home. While singles and couples may be content to live in an apartment (often as a temporary arrangement), once they have children, the demand is overwhelmingly for grade-related housing - especially detached and semi-detached homes. As the supply of that form of housing shrinks, families are looking further afield to find their homes.

A result has been the growing popularity of Simcoe County as a destination to call home. Young suburban style communities, such as Alcona in Innisfil, represent the most attractive places to settle down.

Past market trends show that Simcoe County has been delivering only 10% of its new housing in the form of apartments (2001 to 2021). Single family homes and semi's are the preferred choice of homebuyers - with 77% opting for this form of housing.

Market-Based Forecasts Demonstrate that Future Simcoe County Growth Should Overwhelmingly Be In Grade-Related Forms

Hemson Consulting has been undertaking the Land Needs Assessment work as part of the County's municipal comprehensive review. As part of that work, Hemson has produced a market-based growth forecast for the County. This is an essential step under the Provincial Land Needs Assessment Methodology - especially since the County's future growth must reflect a market-based supply of housing "to the extent possible".

Hemson's market-based forecast anticipates that a market mix of housing in Simcoe County would see 87% of future housing growth in grade-related forms. Only 12% of the demand for housing in Simcoe County to 2051 will be for apartments. The housing mixes above demonstrate that people choose to locate and live in Simcoe County (now and for the foreseeable future) because of a desire to have a grade-related home, that they can afford, in a safe neighbourhood, with yards and trees. They do not come to the County looking for an apartment. As the Hemson Land Needs Assessment observes, growth in Simcoe County includes a significant component of population moving from further south in the GTA, in search of this kind of housing. If they were content to live in an apartment, they would likely remain further south in the GTA.

Simcoe County OPA 7 Significantly Overestimates the Share of Growth that Could be Accommodated in Apartments

In the preparation of their Official Plan Amendment, Simcoe County divided the County into northern and southern market regions for the purpose of the land needs assessment. Growth will overwhelmingly take place in the southern market region, which effectively is in the same commuter shed as much of the GTA.

The Official Plan Amendment adopted by Simcoe County departs significantly from the housing mix that has been historically observed and is now anticipated by a market-based forecast.

Singles/Semis Row Housing Apartments			
Southern Market Region Existing Housing Mix (2021)	83%	7%	9%
Historic Housing Growth Mix (2001-2021)	77%	13%	10%
Market-Based Forecast Mix (2021-2051)	70%	17%	12%
Simcoe County OPA 7 Mix (2021-2051)	50%	18%	31%
OPA 7 Southern Market Region Growth Mix	46%	17%	37%

The proposed mix of housing reflected in Official Plan Amendment 7 includes an unrealistically high level of apartment growth - at almost a third of all housing growth. That is more than triple the historic level of apartment growth. It is even almost triple the apartment share of growth that is projected in Hemson's market-based forecast.

Clearly, Simcoe County's Official Plan Amendment 7 is overestimating the degree to which future growth will occur in apartments - and by the same measure, underestimating dramatically, the degree to which housing growth demand will be for singles and semis. The consequence of this distortion is to significantly understate the amount of land for new settlement area that will be required to accommodate future growth. A proper housing mix would yield a much higher requirement for new settlement area to accommodate this housing.

These distortions are particularly severe in the Southern Market Region used by Hemson, which includes Innisfil. The Official Plan Amendment foresees the ratio of singles and semis to apartments dropping from over 8:1 to almost 1:1. This seems highly unrealistic.

It is worth observing that the current share of apartments in Innisfil (a clear demonstration of proven market demand) is only 2% of all housing units. The total apartment share in 2021 for the southern market region is only 9%. This existing market mix of housing types is dramatically below what Official Plan Amendment 7 plans anticipates.

Simcoe County Land Needs Assessment Makes Unreasonably Low Allocations of Growth to New Settlement Areas in Innisfil - Only 748 Units of a Forecast 15,400 New Grade-Related Units Required in Innisfil Are Allocated to New Designated Greenfield Area (New Settlement Area)

It is not only the case that the Simcoe County Land Needs Assessment assumes an unrealistic proportion of growth will occur in apartments - it also assumes an unrealistically low amount of new growth in Innisfil will take place in new designated greenfield area.

The Simcoe County Land Needs Assessment identified that 15,400 new grade-related units will be required for growth to 2051. However, the County's work only suggests that only 748 units of such housing will take place in new settlement area. The assumption is that over 95% of new grade-related units over the next 3 decades will be accommodated in the existing delineated built-up area and the settlement area expansions made since the Growth Plan was introduced in 2006.

This conclusion in the County's Land Needs Assessment is an indication of the extent to which it is unrealistically limiting the settlement area expansion required to meet forecast market demand.

Official Plan Amendment Intensification Target for Innisfil is Unrealistically High - Historical Intensification Rate is 4%

The existing and in force Simcoe County Official Plan currently has an intensification target of 33% of population growth taking place in the delineated built-up area. However, the reality is that there is very little market demand for that type of housing in Alcona. **The result is that, since the 33% intensification target came into force, the actual intensification rate in Innisfil has been only 4% - despite the ambitious target.**

The County has accepted that the target has been set unreasonably high, in view of the historic 4% intensification rate. However, the adjusted OPA 7 intensification rate is still proposed to be an unreasonably high 30%. There is no sign whatsoever that this revised target is likely to be achieved.

This means that, as a result of the unachievable and unreasonably high intensification rate for Innisfil, insufficient growth has been allocated to new settlement area. The result of this faulty assumption of where growth will occur, is that insufficient new land is being allocated to accommodate growth in new settlement area. Thus, it is almost guaranteed that Innisfil will fall short of delivering sufficient housing to accommodate the forecast population growth set out in OPA 7, and the Growth Plan forecasts.

Thus, it is recommended that the intensification target for Innisfil in the Growth Plan should be adjusted from 30% to 20%. This is still an ambitious target - five-fold the 4% rate of intensification currently being achieved. But it is not as unrealistic as the target in OPA 7.

The result of this one correction alone to OPA 7 would be to increase the population that must be accommodated in new settlement area by 3,974 people - creating the need for an additional 84.5 hectares of new settlement area. Other concerns raised in this submission set out the reasons for significantly increasing the lands required for settlement area well above this figure.

The Growth Plan and Land Needs Assessment Methodology Require Municipalities to Deliver a Market-Based Supply of Housing “To the Extent Possible”

The Growth Plan and the Provincial Policy Statement on Land Use Planning require that housing be delivered in a market-based supply fashion. That includes delivering a full range and mix of housing types to meet market demand.

The Provincial policy direction is clearly set out in section 1.4.3 of the Provincial Policy Statement:

1.4.3 Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area ...

The Growth Plan for the Greater Golden Horseshoe includes, in policy 2.2.6.1 a) i., a requirement for municipalities to plan for housing by “identifying a diverse range and mix of housing options ... to meet projected needs of current and future residents” - which constitutes a direction to deliver a housing supply that responds to market demand.

In addition, the Provincial Land Needs Assessment Methodology must be followed by municipalities, according to section 2.2.1.5 of the Growth Plan, to determine “the quantity of land required to accommodate forecasted growth to the horizon of this Plan”.

The Provincial Land Needs Assessment Methodology requires municipalities to use, as the starting point of their Land Needs Assessment, a market-based housing need forecast, with a market-based mix of housing types. That must then be adjusted to achieve the Growth Plan intensification target (50%) and greenfield density (50 people and jobs per hectare). But the Land Needs Assessment Methodology restricts the degree of this adjustment strictly. Any departure from the market-based housing need forecast and mix of housing types must be done **“while ensuring the provision of a market-based supply of housing to the extent possible”**. Once the adjustment has satisfied the Growth Plan density and intensification targets, no further departure from the market-based supply is permitted.

These above provisions represent changes to the Provincial Policy Statement and Growth Plan (including Land Needs Assessment Methodology) by the current Government over the policies of the previous Government. Previous policies put the focus on limiting suburban development, and compelling development and new housing to be overwhelmingly in apartments. The current Government's new policies were intended to more closely reflect what Ontario residents actually wanted as their housing. The serious housing supply shortage, and resulting housing crisis price escalation, are the clearest demonstration of the success of the previous policies that aimed to, and succeeded in, restricting housing supply in forms that Ontario families sought. However, this is a serious failure from the perspective of aspiring homeowners - especially young families and new Canadians seeking to share in the Canadian dream of home ownership enjoyed by previous generations.

Simcoe County Land Needs Assessment Unrealistically Assumes that Population Growth Will Actually Continually Decline Throughout the Next Thirty Years

At the same time as a clear trend sees population growth rising rapidly in areas peripheral to the the GTA, the Simcoe County Land Needs Assessment makes the opposite assumption - that both the absolute numbers of population growth, and the rate, will decline in each census period. This seems highly unlikely based upon all trends and indicators.

As the supply of grade-related housing in the GTA tightens compared with demand, and thus such housing becomes more expensive, people are moving increasingly to communities like those in Simcoe County in search of space and affordability. Even as communities further south like Toronto and York Region experience constraints in supply of detached single family housing, the demand for this type of housing will remain strong - especially among young families. As a result, much of that detached housing demand will be displaced, especially to places like Innisfil and Simcoe County.

In addition, as immigration continues to rise, there is no sign that a decline in population growth in Simcoe County is at all likely.

However, the County's Land Needs Assessment assumes such a decline in growth, (and housing unit demand) will take place.

Census Interval	Population Growth
2016-2021	46,100
2021-2026	34,980
2026-2031	34,590
2031-2036	34,010
2036-2041	31,090
2041-2046	30,120
2046-2051	29,540

As the Hemson Land Needs Assessment report for the County actually observes:

“The high population growth in the County since 2016 is not a phenomenon that is unique to Simcoe. Similar rapid growth has been experienced in Regions and Counties situated on the fringes of the fast-growing metropolitan areas of the Greater Golden Horseshoe, even in predominantly rural and agricultural communities areas with little experience of growth such as the Counties of Brant, Bruce, Grey, Hastings, and Northumberland”.

The continued growth of population in the Greater Golden Horseshoe will realistically see absolute population growth continue to rise in the peripheral areas. This is especially the case for Simcoe County, which benefits from the presence of the Highway 400, and proximity to York Region and even Toronto, a relatively short commute away.

In assuming a decline in growth, the Land Needs Assessment for OPA 7 appears to have underestimated the level of future population growth, and demand for housing.

Provincial Schedule 3 Population Forecasts Appear Low in View of Federal Immigration Policy

The population forecasts that are found in Schedule 3 of the Growth Plan already appear to be falling far short of actual population growth. The Schedule 3 forecasts were based upon work undertaken by Hemson for the province.

The shortfall in the forecasts is not the result of any flaw in Hemson’s work. Rather, since Hemson undertook their work, federal immigration policy has seen a move to much higher annual immigration levels. As a result, Canadian immigration (the principal source of Ontario population growth) is already running at a level over 100,000 people a year higher than Hemson assumed in their forecasts. With almost half of that growth headed for the Greater Golden Horseshoe, this means that the schedule 3 forecasts reflect a population growth level that is already about 50,000 people a year lower than what is actually taking place.

Hemson produced a technical report, dated August 26, 2020, entitled Greater Golden Horseshoe: Growth Forecasts to 2051. This technical report “presents the long-term growth forecasts for the Greater Golden Horseshoe”, setting out how the Growth Plan schedule 3 forecasts to 2051 were determined.

The report indicates that “The GGH forecasts assume that immigration continues to be the most important component of growth in the GTA/H”.

Hemson made the following key assumptions:

- Canadian immigration in 2021 would be 350,000.
- This would “gradually increase” over the forecast period.
- Ontario’s share would be about 45%, increasing slightly over the forecast period.
- The Greater Golden Horseshoe share of Ontario immigration will remain steady around 88%.

As a result, Hemson produced a table indicating annual population increases in the Greater Golden Horseshoe attributable to immigration as follows:

Census Interval	Annual Immigration Based Population Increase GGH
2016-2021	137,600
2021-2026	137,200
2026-2031	127,000
2031-2036	133,200
2036-2041	140,400
2041-2046	147,400
2046-2051	153,400

However, Canada has dramatically increased immigration levels since the Hemson forecasts. There has not been a “gradual” increase over the horizon, but rather a dramatic step up, with no indication it will drop in the future.

Year	Canada Immigration Levels	Hemson Assumption
2021	405,000 (actual)	350,000
2022	432,000 (actual)	
2023	465,000 (forecast)	
2024	485,000	
2025	500,000	

Applying the same Ontario (45% of Canada) and Greater Golden Horseshoe (88% of Ontario) immigration share assumptions as Hemson, the following are the Greater Golden Horseshoe numbers:

Year	GGH Growth Immigration Based	Difference Over Hemson Assumption
2021	142,560	+5,360
2022	152,064	+18,865
2023	184,149	+46,949
2024	192,060	+54,860
2025	198,000	+60,800

Based on the above, the Schedule 3 forecasts have fallen short by over 70,000 in 2023. Even assuming that the steep immigration growth flattens after 2025, and the gap between actual immigration growth in the Greater Golden Horseshoe and the Hemson forecasts remains steady at 60,000 per year for the balance of the forecast period, the cumulative result is a significant shortfall in the forecasts in schedule 3, compared with what is now likely to occur based upon federal immigration policy. In fact, the cumulative result is that the schedule 3 forecasts are 1,741,000 below what will occur.

The Simcoe County share of Greater Golden Horseshoe growth to the horizon, based upon Hemson's work, is 4.2%. That 4.2% share of the additional population resulting from immigration is 73,122. The result is that the schedule 3 growth for Simcoe County should be 271,122 (instead of 198,000).

Allocation of Additional Immigration-Related Growth Should Result in Increase in Innisfil Population by 15,721

The Simcoe County Land Needs Assessment allocates 21.5% of the County's growth to Innisfil. The shares assigned to the other two major growth municipalities are 19% to new Tecumseth, and 17.5% to Bradford West Gwillimbury.

As a result, the populations allocated to those municipalities in the Land Needs Assessment should be adjusted upwards as follows:

**Municipality Increase in
Population Allocation**

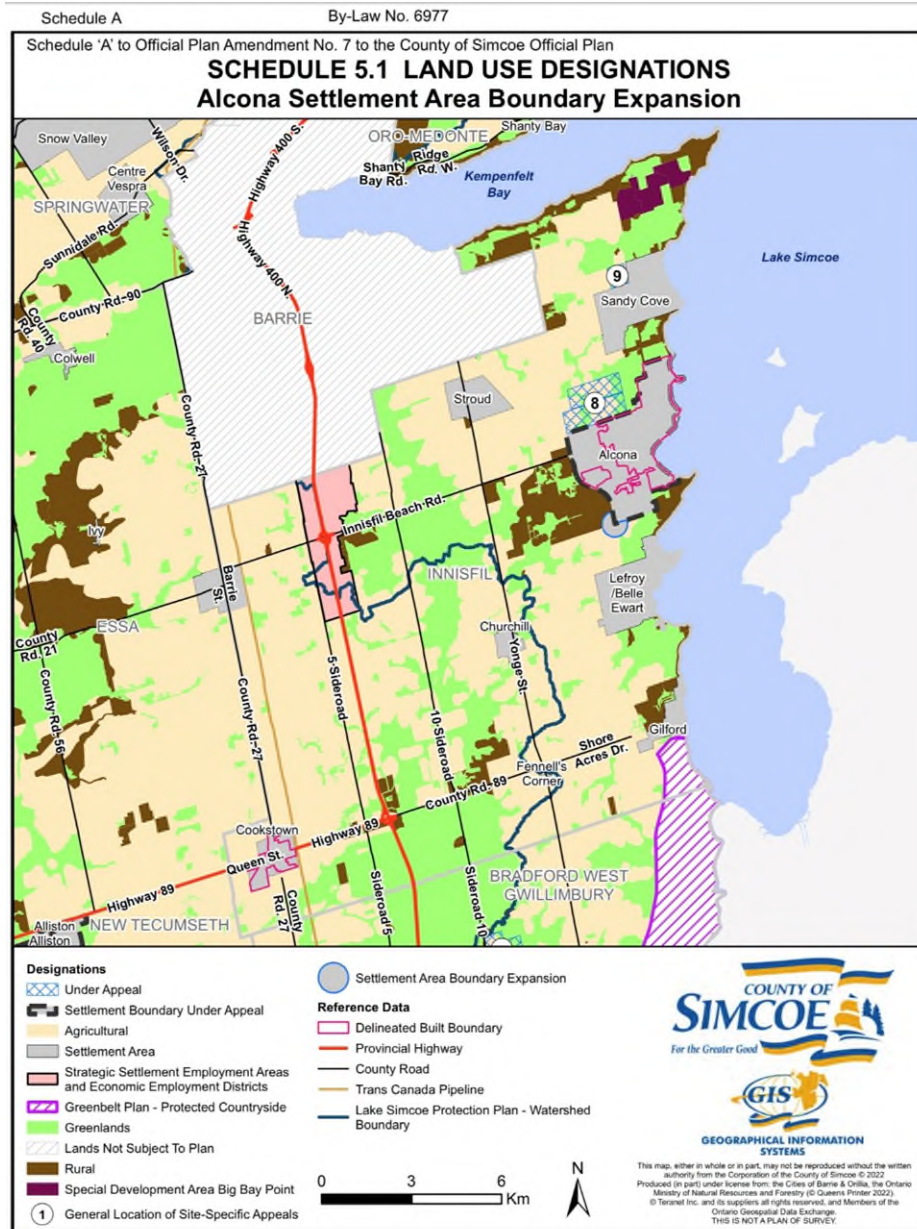
Innisfil	15,721
New Tecumseh	13,893
BWG	12,795

Simcoe County Official Plan Amendment 7 should be modified to reflect these higher growth figures. In Table B in OPA 7, Innisfil’s growth figure for 2021 to 2051 should be modified from 39,740 to 55,461. The 2051 population figure for Innisfil should be modified from 84,450 to 100,200.

This additional increment of immigration-driven population growth from federal policy changes yields a requirement for an additional 342 hectares of settlement area for community use in Innisfil.

The Pratt Lands in North Alcona Represent a Logical Extension of the Alcona Settlement Area in the Simcoe County Official Plan

The Pratt lands are shown as appeal number 8 on the below schedule A to Simcoe County Official Plan Amendment 7.



As the plan shows, the lands are contiguous with the existing settlement area, and represent a logical extension of the Alcona community, which is the main settlement area of the Town of Innisfil. It will result in a compact urban form, in a complete community context. Alcona is identified in the Growth Plan as the Primary Settlement Area in Innisfil - meaning that it is intended to be the principal location for future population growth in the municipality.

Innisfil Adopted and then Simcoe County Originally Approved the Inclusion of the Pratt Lands in Settlement Area 14 Years Ago - But the Previous Government Appealed this to the OMB

The Pratt lands south of the 9th were originally included in settlement area by way of Innisfil Official Plan Amendment 1, adopted by the Town on April 15, 2009. This settlement area expansion was approved by Simcoe County on October 14, 2009.

However, on November 9, 2009, the Province appealed the County's approval of the settlement area expansion to the Pratt lands, on the basis that expanding the boundaries of the Alcona Settlement Area did not conform with Growth Plan policy 2.2.8 relating to settlement area boundary expansions.

Specifically, the province objected that there was "no need to expand the Alcona settlement area to include the Pratt Lands based on the population and employment allocations to the Town of Innisfil to 2031 in Schedule 7 of the Growth Plan 2006." and "the proposed expansion of the Alcona community would provide more land than is required to accommodate the in-effect population allocation to the Town of Innisfil...".

It is worth observing that this approach by the previous Government of treating population forecasts as "allocations" or hard caps is in large part responsible for the resulting supply shortage and housing crisis that the province faces today. The current Government has corrected this by clarifying that the housing forecasts are "minimums" which can be exceeded by municipalities, to ensure an adequate supply of housing. In addition, schedule 7 of the Growth Plan has been deleted by the current Government.

In an OMB Settlement, a Commitment was Made that the Pratt Lands Would be Next Addition to Settlement Area and that the Town continues to support the expansion of the Alcona settlement area to include the Pratt Lands

In November 2017, the Province, Simcoe County, Innisfil and Pratt entered into minutes of settlement that adjourned the appeals with respect to the Pratt Lands south of the 9th.

The Minutes of Settlement include an agreement and acceptance as fact among the Province, County, Innisfil and Pratt that:

Support for Urbanization of the Pratt Lands

The Town continues to support the expansion of the Alcona settlement area to include the Pratt Lands, subject to applicable provincial and County policy. This is consistent with the proposed northerly expansion area set out in OPA 1 as adopted by the Town.

It is a priority for the Town that the Pratt Lands be developed for urban uses.

Minutes also provided that, “If the County allocates additional 2041 population and/or employment growth to the Town in conformity with Growth Plan 2017, which results in expanding Alcona to include the Pratt Lands, the Ministry growth management concerns will have been addressed”.

With the Growth Plan now including new higher population forecasts to 2051, it is clear that the Pratt lands, originally approved by the County for growth to 2031, are now long overdue for inclusion in the settlement area for Innisfil and Simcoe County.

Servicing Infrastructure is Anticipated to be Available to Serve the Pratt Lands Over the Horizon of the Plan

The Lakeshore Wastewater Treatment Plant in Innisfil obtained an Environmental Assessment approval for initial expansion to 25,000 cubic metres per day, with an ultimate expansion to 40,000 cubic metres per day. (Interim upgrades have made it possible to defer somewhat the construction of the plant expansion). The Environmental Assessment approvals, and utility plans exist to accommodate significant additional growth in Innisfil.

An Innisfil staff report dated August 8, 2018 identifies a possible Alcona North settlement expansion as a “key project” to be accommodated by the planned wastewater capacity for this treatment plant. In fact, the Town plans to fund the approved capacity expansions through development charges and front-end financing from anticipated development such as Alcona North.

The Town’s Water Treatment plant was also recently upgraded - actually winning awards for efficiency. The changes were made to accommodate future growth as well.

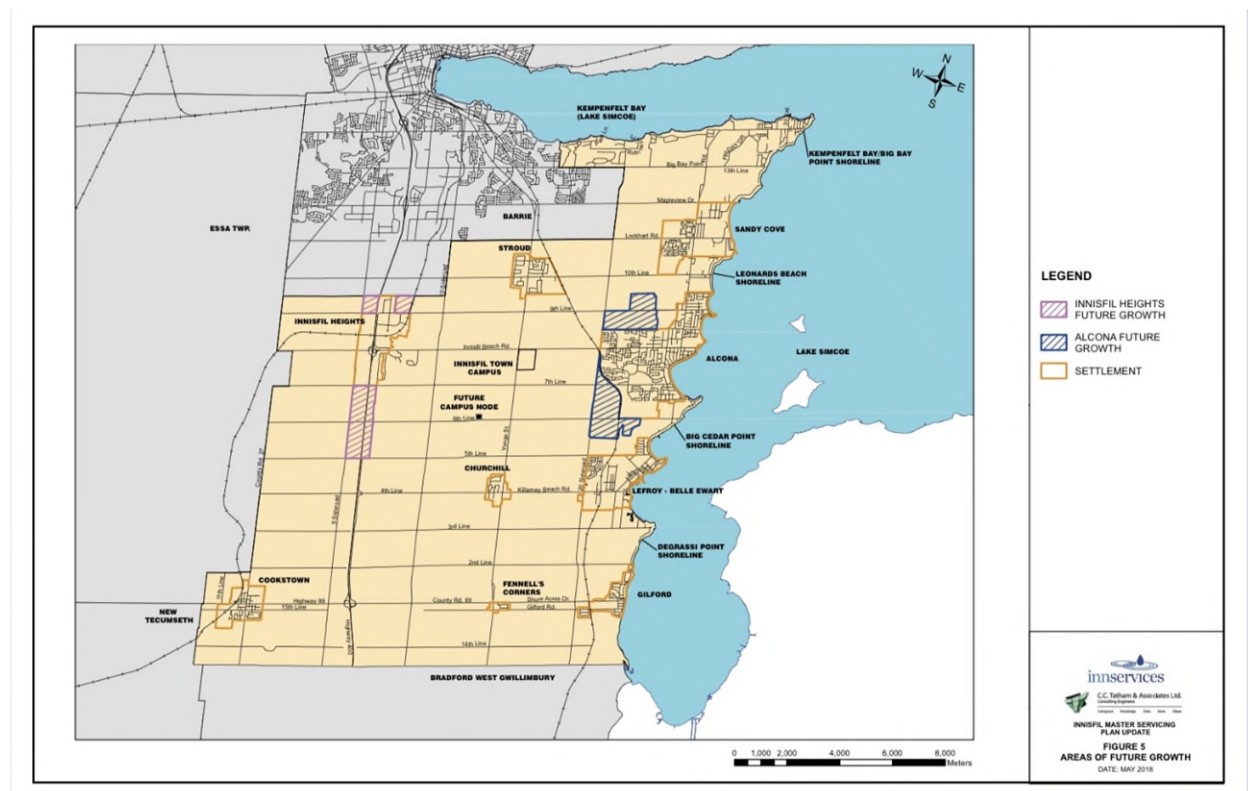
The Town completed a Master Servicing Plan Update in November 2018. Under the report’s section entitled Master Plan Purpose and Objectives, it includes the following:

“Provide water and wastewater servicing to the planned population and employment growth to the year 2031...”

At page 14 of the Master Servicing Plan, the North Alcona lands are specifically identified as a growth area to which the plan applies:

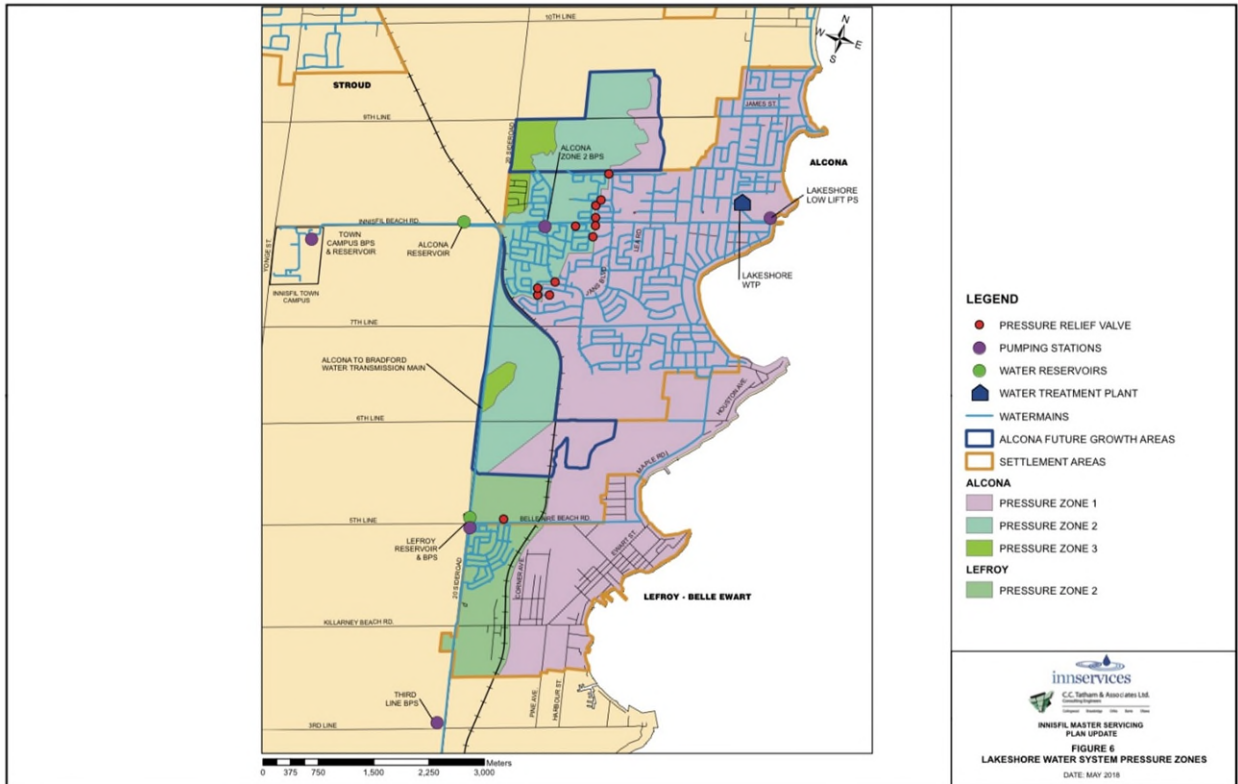
“Most of the residential growth in Innisfil is planned for Alcona. A 260 HA area in the south referred to as South Alcona, and a 204 HA area in the north, referred to as North Alcona, are designated as Growth Areas in OPA No. 1.”

The Master Servicing Plan includes the following map identifying the future growth areas for which it is planning:



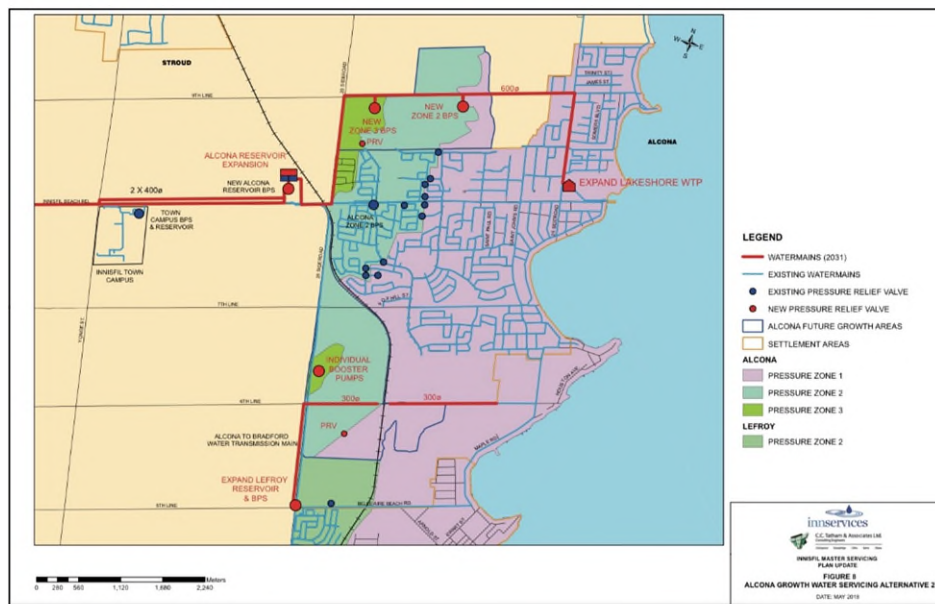
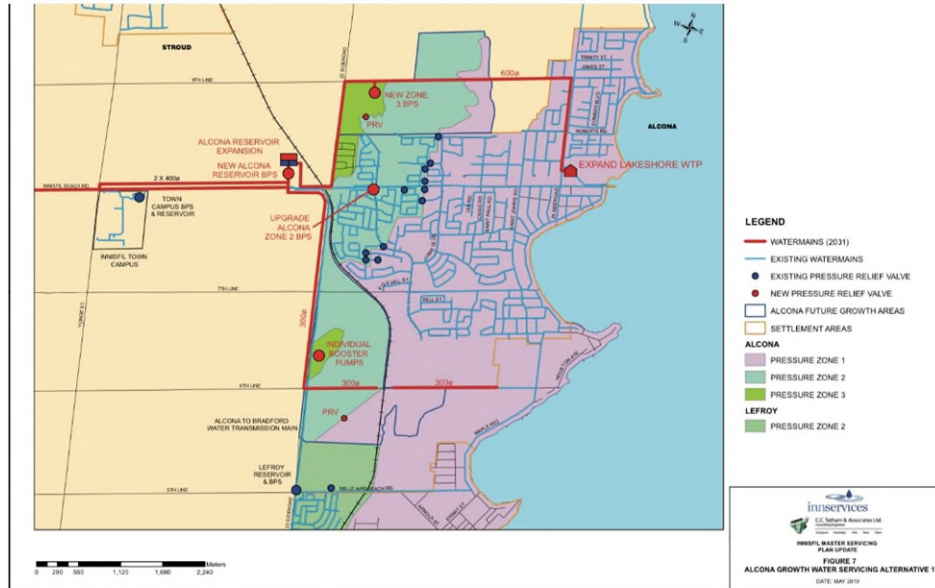
The Pratt lands correspond to the land mapped as “Alcona Future Growth” in hatched blue, on the north side of the Alcona Primary Settlement Area.

The Master Servicing Plan goes on to identify the Town's existing water system pressure zones in the plan that follows:



This figure again identifies the Pratt lands as Alcona Future Growth Area. The Pratt lands are located partly in water pressure zone 1, and mostly in water pressure zone 2.

The Master Servicing Plan then identifies two alternatives for the water servicing of the Alcona Primary Settlement Area.



Both of these alternatives include the Pratt lands in Town water pressure zones. In both alternatives, a significantly sized watermain is planned to be located along the Ninth Line - in the middle of the two parcels that constitute the Pratt lands. In conclusion, it is clear that the Town Master servicing Plan intends that the Pratt lands will have available water services by 2031.

The Master Servicing Plan includes similar drawings relating to the planned servicing infrastructure for wastewater:



The above Figure 11 shows the installation of a new sanitary gravity sewer to be installed by 2031, again travelling between the two sides of the Pratt lands along 9th Line. This demonstrates that the Master Servicing Plan has been prepared with the intention of servicing the development of the Pratt lands.

Of significance, the fact that these services are all intended to be in place by 2031 indicates that not only can the lands be served by infrastructure - but that they can be serviced early in the Growth Plan's horizon - allowing important housing supply to be delivered to the market on an accelerated basis.

Development of the Pratt Lands will Facilitate Upstream Stormwater Management Solutions that Will Reduce Flooding Issues Downstream in Established Neighbourhoods

Parts of Innisfil located close to Lake Simcoe are low lying, and subject to occasional flooding. This is the case for established neighbourhoods to the east and south-east of the Pratt lands.

The Pratt lands are traversed by a watercourse that delivers much of the water flow to the areas susceptible to flooding. Currently, rainwater and meltwater flows off the fields, and through the watercourse without any flow management at all. The result is downstream flooding.

The development of the Pratt lands will provide the opportunity to establish proper stormwater management practices and facilities to manage those flows, and alleviate the flooding risk in the currently susceptible downstream neighbourhoods.

The Town has identified the potential to address the current flooding issues through the introduction of stormwater management measures and facilities when the Pratt lands develop.

The Innisfil Comprehensive Stormwater Master Plan Report dated October 21, 2016 identified that in future development (i.e. North Alcona), "overcontrol of the peak flows should be provided in on-site SWM ponds in order to reduce downstream peak flows to reduce flooding." (Page 86)

The report, at page 91, specifically identifies a recommendation to achieve this in North Alcona: "Provide 25% peak peak flow overcontrol."

Inclusion of Pratt Lands in Settlement Area Is In Conformity with Growth Plan Policy 1.2.1 Guiding Principles and In Conformity with Growth Plan Policy 2.2.8.2 and 2.2.8.3 for Settlement Area Boundary Expansions,

The inclusion of the Pratt lands conforms with numerous policies from the Growth Plan for the Greater Golden Horseshoe.

The proposed settlement expansion conforms with provincial policies as follows:

- The Pratt lands support the planning for infrastructure, and the efficient use of public investment in infrastructure. The Pratt lands are located in areas in which water and wastewater infrastructure is to be in place by 2031.
- The lands will result in a more complete community, with a compact form of settlement area. It will reinforce the Growth Plan's policy requirement of directing growth to the Alcona Primary Settlement Area, identified as such in schedule 8 to the Growth Plan.
- The new settlement area will be well-served with local stores, services, schools, and public service facilities. Several supermarkets, drug stores, restaurants, retail and service uses can be found nearby on Innisfil Beach Road.
- Goodfellow School, Alcona Glen School, and Holy Cross Catholic School are all a short walk from the Pratt lands.
- The area is well-served by parks and recreation facilities. The major Innisfil Beach Park on Lake Simcoe, and the Innisfil Recreation Centre (featuring two ice pads, swimming pools, gym, soccer fields, baseball and more) are also both a short drive from the Pratt lands.
- A south campus of the Royal Victoria Hospital has been the subject of a municipal zoning order from the province. It will be located just a 4-5 minute drive from the Pratt lands.
- The form of the community resulting from the requested settlement area expansion will result in a high overall quality of life for all residents.
- The form and mix of proposed housing will both be responsive to market demand needs, and by virtue of its location, add to the affordability of the housing supply in the greater Golden Horseshoe. To the extent that adequate supply is critical to affordability, the additional quantity of housing will add to affordability. The location in Innisfil provides an opportunity to offer families home ownership on a much more affordable basis than in other locations further south.
- The opportunity, through the development of the Pratt lands, to address downstream flooding issues in nearby existing neighbourhoods represents an important enhancement of the current hydrologic systems, limiting the risk from existing offsite flooding hazards, for the benefit of the broader community. The key natural heritage features in the area will be preserved in any development.
- The proposed settlement area expansion is required based on market based growth forecasts and the application of the Land Needs Assessment Methodology.

- The area has been studied extensively with respect to watershed and water resource issues, and has minimal groundwater recharge areas, according to the Comprehensive Master Stormwater Servicing Plan.
- The lands in question are not considered essential to the agri-food system. There are no specialty crop or similar high value agricultural lands involved. The Pratt lands have no agriculture-related buildings on them, and no recent agricultural investment of note has been made on site. No issues related to minimum-distance separation are anticipated.

In view of the numerous considerations above, the inclusion of the lands in settlement area conforms with the requirements of the Growth Plan.

Section 3.2.27 Proposed By OPA 7 Should be Deleted Because It Imposes Caps on Housing Growth, Contrary to the Provisions of the Growth Plan

Simcoe County Official Plan Amendment 7 proposes a new policy that will serve as a cap to housing growth, by asserting that the numbers in Table 7 shall be treated as maximums.

Changes introduced by the current Government in the Growth Plan have made clear that such caps or maximums are not to be applied to future housing growth. The growth forecasts are to be treated as minimums.

In contrast, section 3.2.27 reads as follows:

3.2.27 The gross land needs for development identified on Table F are considered to be maximums and do not include the land areas that are excluded from the calculation of the designated greenfield area density target in Section 3.2.7 h). Local municipalities may plan for less land based on local context provided it can be demonstrated that the population and employment forecasts set out in Sections 3.2.4 and 3.2.5 can be met.

The spirit of the above section is that each municipality is actually free to “plan for less”. This is directly contrary to the policy of the Provincial Government, as reflected in the Growth Plan, and the Housing Supply Action Plan - that is that all municipalities must be doing their share to deliver an increased supply of housing.

Section 3.2.27 should be deleted as not in conformity with the Growth Plan and provincial policy. To further clarify the intent of the current Provincial policy, text should be added to Table B (population) and to Table F (land need), indicating that “All figures in this table should be treated as minimums.”.

Province Can Modify the Adopted Plan, or Refer It to The Land Tribunal for a Hearing

Under section 3 of the planning act, the Minister, in carrying out his responsibilities and making planning decisions, must act in conformity with provincial plans (in this case the Growth Plan for the Greater Golden Horseshoe), and consistent with the Provincial Policy Statement on land Use Planning. A decision to approve the official plan adopted by Simcoe County will not be consistent with the Provincial Policy Statement, or conform with the Growth Plan.

The Provincial Policy Statement in policy 1.1.1.b) requires municipalities to accommodate a “*market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing and housing for older persons)*”. The official plan amendment does not provide this market-based range and mix including single-detached housing.

The Growth Plan requires, in policy 2.2.1.5, that municipalities must use the Land Needs Assessment Methodology to determine the need for land to accommodate growth over the horizon of the Official Plan (now 2051). The methodology, on page 9, while allowing for adjustments to the market-based supply forecast to achieve the density and intensification targets of the Growth Plan, requires “ensuring the provision of a market-based supply of housing to the extent possible”. That means that, if the plan’s numbers depart from a market-based supply more than necessary to achieve 50% intensification, and 50 people and jobs per hectare in the Greenfield Area, the plan will NOT be in conformity with the Growth Plan.

On page 13, the methodology explains an aspect of this in more detail. The methodology says that the market-based forecast should be adjusted to meet the density targets of the Growth Plan “while still providing a full range and mix of housing options to meet the market-based demand of housing that meets the current and future needs of residents”, and if that is not possible, an alternative density target should be sought.

Thus, the Minister cannot approve the Official Plan as adopted by Simcoe County and be following the requirements of section 3 of the planning act to act in conformity with the Growth Plan, and consistent with the Provincial Policy Statement.

It is clear that the Growth Plan and Provincial Policy require the Minister to provide additional settlement area expansion beyond that identified in Official Plan Amendment 7.

In view of the need for additional settlement area, the Pratt lands in North Alcona are ideally suited for settlement area expansion. Indeed, in numerous municipal documents, they have already been identified and planned for as an area of future development.

While the analysis in this submission supports the inclusion of significant new settlement area in the Simcoe County Official Plan, at a minimum, we are asking the Minister to consider the following options.

A) Modify Simcoe County Official Plan Amendment 7, as follows:

1. **Section 3.2.26, Table F, Innisfil:** Modify Table F to increase the Community Use area allocated to Innisfil to 253.73 hectares from 104.2 hectares.
2. **Section 3.2.26, Table F:** The following text should be added to this table:
“All figures in this table should be treated as minimums.”
3. **Section 3.2.4, Table B, Innisfil:** Modify Table B to increase the 2051 population number to at least “91,450” from 84,450, which is a 2021-2051 increase of “46,740” rather than “39,740”.
4. **Section 3.2.4, Table B:** The following text should be added to this table:
“All figures in this table should be treated as minimums.”
5. **Schedule 5.1, Land Use Designations:** Modify Schedule 5.1 to include the Pratt lands in the “Settlement Area”.
6. **Section 3.2.27:** Delete this section as it does not conform with Growth Plan by imposing a cap on potential housing growth.
7. **Section 3.2.6 b), Table D, Innisfil:** Modify Table D to reflect an intensification target of 20% for Innisfil.

[NOTE: If the federal immigration forecast population growth analysis in this submission is accepted, the figure for Innisfil in Table F should be further increased by the addition of another 342 hectares, and the figure for Innisfil in Table B should be further increased by the addition of another 15,721 in population.]

B) In the alternative, refer Simcoe County Official Plan Amendment 7, and the appropriateness of including the Pratt Lands in Settlement Area, to the Ontario Land Tribunal for a decision, and to consider the issues reflected in this submission and the requested modifications above.

If option B is selected, the Minister should, in the referral, advise the Tribunal of his concern that Simcoe County did not properly follow the Land Needs Assessment Methodology - in particular, its requirement for “ensuring the provision of a market-based supply of housing to the extent possible” (page 9) and “providing a full range and mix of housing options to meet the market-based demand of housing that meets the current and future needs of residents” (page 13).

Yours truly,



AIRD & BERLIS LLP

Hon. Peter Van Loan
Partner

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