

February 2, 2023

MGP File: 21-2951

The Honourable Minister Steve Clark
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, Ontario M5G 2E5

Attention: Julianna Zhuo (Municipal Services Office – Central Ontario)
Julianna.Zhuo@ontario.ca

Dear Ms. Zhou:

**RE: New Tecumseth Community Builders Inc., South Alliston
ERO No.: 019-6113 (Ministry Reference No. 43-OP-221936)
Comments on County of Simcoe Official Plan Amendment No. 7**

On behalf of the New Tecumseth Community Builders Inc. (“NTCBI”), Malone Given Parsons (“MGP”) **requests that the Province modify Simcoe County Official Plan Number 7 (“COPA 7”) to include the Harvest Community into Simcoe County’s settlement area boundary.**

NTCBI, through the work already completed by its consulting team and presented to the Town of New Tecumseth (the “Town”) and Simcoe County (the “County”) in 2022, has demonstrated that the inclusion of its lands within the settlement area will achieve the goals of the Town, County and Province, including:

1. Directing growth to the Primary Settlement Area of Alliston, where most of the growth should be focused,
2. A commitment to a robust Natural Heritage System including trails, multi-use paths, and recreational uses,
3. The early delivery of significant community parkland to the Town prior to development approvals so that it can be of benefit to the existing community as early as possible,
4. A financial commitment to fund approximately \$380 million in water supply, sanitary treatment and road infrastructure for immediate and future community needs so that debt and financial risk are no longer a municipal concern,
5. A complete community that is comprehensively planned to provide a range of housing, transportation, education, recreation, shopping, and employment uses.

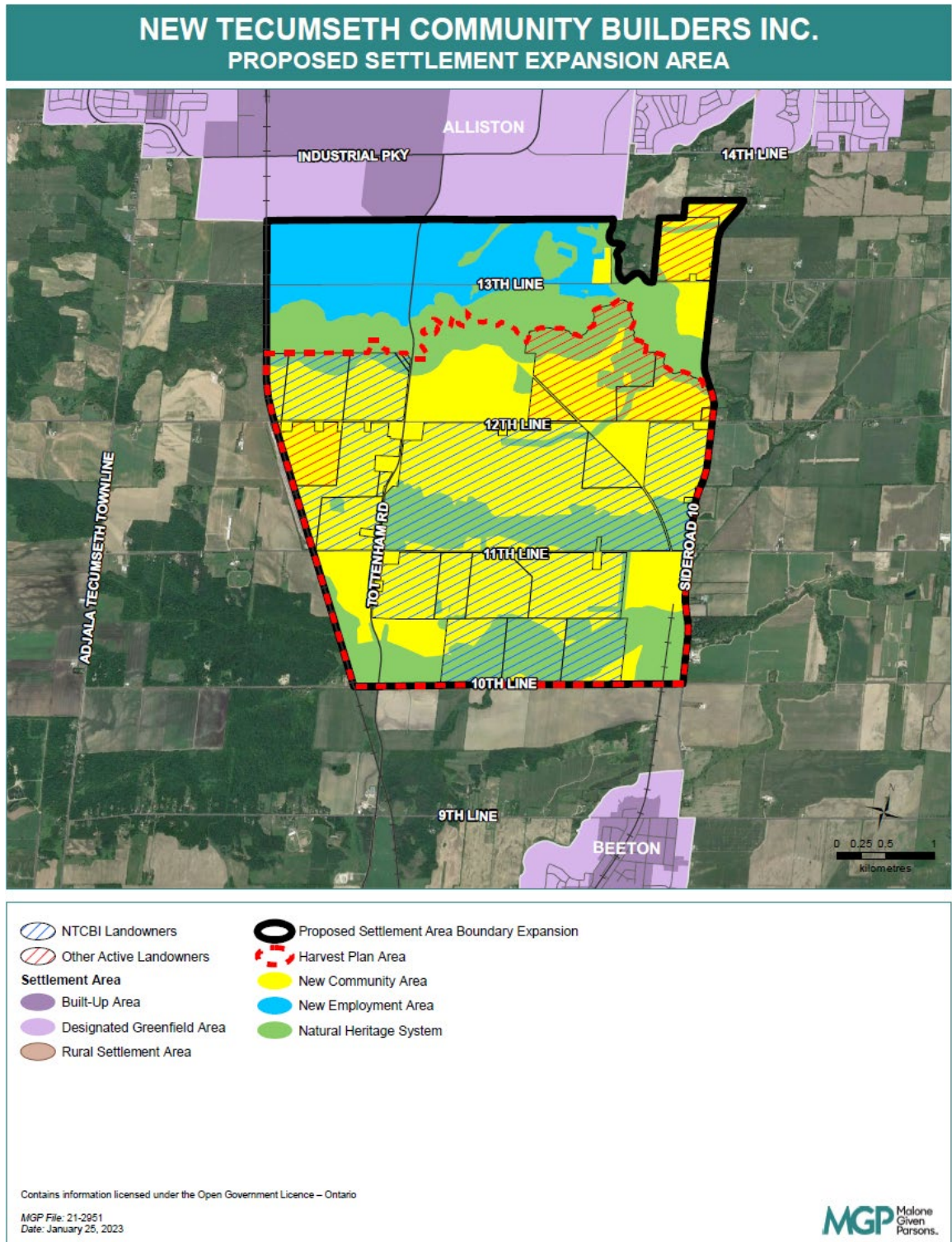
BACKGROUND

MGP is the planning and land economist consultant for the NTCBI, which includes experienced community builders (Mattamy Homes, Solmar Corporation, Lakeview Homes,

Garden Homes, and Flato Land Holdings), who, along with DG Group, collectively own multiple properties south of Alliston, collectively referred to as the “Harvest” lands.

Figure 1 below illustrates the location of the NTCBI and other active landowners’ lands in South Alliston within the anticipated employment and community structural land use designations.

Figure 1 - NTCBI and other Active Landowners - Proposed Settlement Area Boundary Expansion, South Alliston



The remainder of this letter provides background for this request, as well as the specific amendments required to COPA 7 to implement this request.

Significant growth must be directed to Primary Settlement Areas in Simcoe to contribute to a Complete Community in South Alliston

On behalf of the landowners, MGP has undertaken a comprehensive Land Needs Assessment (“LNA”) analysis to assess land needs in the County to the year 2051.

Section 6 of the Growth Plan contains policies for Simcoe County that states that growth must be directed to lower-tier municipalities by the County during its Municipal Comprehensive Review exercise to implement the Growth Plan. Policy 6.3.4 also requires that lower-tier municipalities with Primary Settlement Areas (including New Tecumseth) direct a significant portion of population and employment growth forecasted to the applicable primary settlement areas. Schedule 8 to this plan identifies Alliston as the Primary Settlement Area in the Town of New Tecumseth.

In considering where to direct growth in Alliston, the NTCBI Harvest lands represent the best opportunity around Alliston to ensure growth will be comprehensively planned, resulting in a complete community. Directing growth to South Alliston also permits the designation of new employment and community lands, and directs growth between Alliston and Beeton, where both settlement areas can benefit from the new community uses and infrastructure that will result from growth in this area. The landowners have also committed to work with the local municipality to provide additional community benefits and to fund servicing improvements required to realize both growth in Harvest and continued growth in the existing communities of New Tecumseth, at no financial risk to the local municipality.

In our opinion, the Harvest lands are the most appropriate and logical location for settlement area boundary expansion in the County and Town for the following reasons:

- Alliston is a Primary Settlement Area and should be planned to accommodate a significant amount of growth to 2051 and Alliston is well suited for additional residential growth to compliment significant existing and future employment lands.
- The Harvest lands are situated in proximity to the existing settlement area boundary of Alliston, which makes it a logical and optimal location to accommodate a significant portion of the growth forecasted in the County to 2051.
- The NTCBI lands provide sufficient scale to deliver a complete community and can conform to the Growth Plan and County policies in this regard.
- The NTCBI lands can be phased to ensure logical and sequential growth in accordance with the delivery of necessary and warranted hard and soft infrastructure.
- The NTCBI lands are capable of delivering required ‘big picture’ infrastructure including Development Charge revenues to upgrade key infrastructure such as

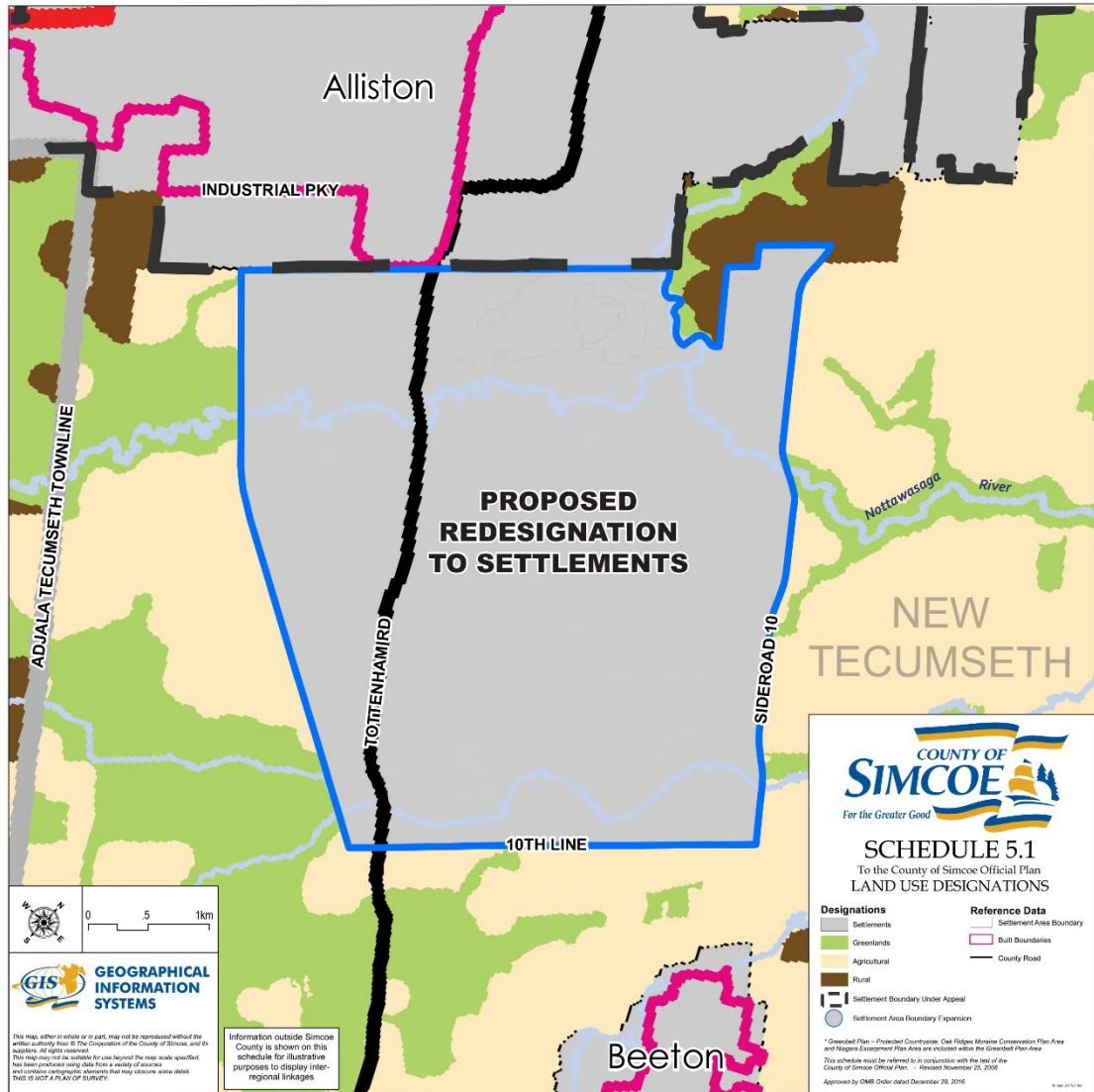
water treatment plants in Collingwood and improvements to water supply systems in Tottenham, in addition to possible transportation road improvements.

- The Harvest concept plan prepared by NTCBI provides for a full mix and range of land uses, housing options, parks and recreations facilities (including a large community park and potential fairground and other community uses) and will protect significant environmental features.
- There is existing transit connecting Alliston and the Town to other urban hubs within the County and beyond and longer-term potential for GO rail service that will support growth in Alliston. A range of multi-modal transportation options within Harvest will reduce auto dependency, mitigate GHG emissions, and contribute to a sustainable and resilient community.
- The Harvest lands represent a contiguous, orderly, and logical expansion to the existing Primary Settlement Area of Alliston. The significant size of the Harvest lands allows for them to be holistically planned as a complete community, with its own community amenities and services, including schools, parks, natural heritage and open space systems, and transportation networks. The NTCBI landowners are also committed to providing a variety of housing types, sizes, tenures, and prices in order to address widespread housing supply and affordability issues.
- Given its proximity to Alliston, the Harvest lands can be serviced through the expansion of existing facilities and infrastructure. As mentioned above, the scale and size of the Harvest lands provides a unique opportunity for the NTCBI landowners to provide front-end financing to construct the necessary infrastructure required to accommodate the significant growth projected for the Town while alleviating and mitigating the Town's financial risk. The details of the NTCBI financial commitments are outlined in Appendix G and total approximately \$380 million towards Town projects.

A conceptual plan and vision for the development of the Harvest lands that addresses the above matters is shown in Figure 2 below, and attached as Appendix B. It should be noted that the plan is very much conceptual and the landowners are committed to working with the Town and other stakeholders to create a shared vision for the community that meets a range of needs and objectives.

Further, we have prepared a policy analysis that demonstrates that a settlement area boundary expansion on the Harvest lands can occur in conformity with the policies of 2.2.8.3 of the Growth Plan, and the settlement area boundary expansion criteria identified by the County and Town during the municipal comprehensive review (Appendix A to this letter). In our opinion, directing growth to South Alliston on the Harvest Lands is good planning and would conform to the applicable Provincial, County and Local policies, subject to the additional work required at the lower-tier level. The scale and size of the Harvest lands provides an opportunity to comprehensively plan for a sustainable, affordable, and complete community.

Figure 3 - Request Settlement Area Boundary Expansion through modified COPA 7



In order to achieve a logical boundary for the proposed settlement area boundary expansion, NTCBI will work with the Province, County, and Town to develop an appropriate phasing plan for the Harvest lands that provides for financially sustainable growth while meeting the immediate housing needs of the Province.

Requested Modifications to COPA 7 – Growth Management Policies

We have noted significant differences between our work and the County's LNA, the latter of which has now been incorporated into COPA 7. It is our opinion that these issues should be addressed through corrections/modifications to COPA 7 prior to final approval by the Province. These include:

1. Correction to Table A by moving the following settlement areas from Category 3 to Category 4 recognizing they do not have full servicing: Atherly-Uptergrove, Colgan, Hillsdale, New Lowell, Nottawa, Stroud, Thornton.
2. Adjustment to the population and employment forecasts by local municipality contained in Tables B and C. In particular, the population and employment forecasts for the Town should be adjusted to approximately 112,000 people and 36,000 jobs respectively. This change would assign approximately 34% of population growth to 2051 in the County to the Town, reflecting the policy imperative to direct significant growth to Alliston as a primary settlement area in the Southern Market Area of the County, and the potential to realize this growth through commitments from the landowners to work cooperatively with the Town to front-fund servicing. The employment forecasts would reflect a laudable person to job ratio of 3:1, the strong local economy in Alliston, and the ability to attract new jobs through both employment lands employment and population-related employment uses.
3. Modification to policy 3.2.6 a) to replace '35%' with '27%' for the residential development occurring annually in the County within the delineated built-up areas to reflect the intensification rates currently being achieved in the County as demonstrated in the County's Growth Management work. Similarly, policy 3.2.6 b) should be modified to reflect a 27% County-wide intensification target, as well as a 17% intensification target for New Tecumseth to reflect the intensification analysis and potential prepared by MGP.
4. Modification to policy 3.2.7 to replace '51' with '37' for the County-wide minimum designated greenfield areas density target, as identified in MGP's Designated Greenfield Area Analysis. The minimum target for New Tecumseth should be modified to be a minimum of 43 which reflects the average of lower existing designated greenfield areas with the higher density new areas of the Harvest Lands.
5. Modification to Table F to revise New Tecumseth to allocate 780 hectares of Community Uses land and 270 hectares of Employment Lands with the required adjustments to the remainder of the table, and the inclusion of between 200-400 hectares in the primary settlement areas (particularly Alliston) in the Southern Regional Market Area to account for lands in the north that may not develop within the Plan horizon.
6. The deletion of policy 3.2.27 as it inappropriately identifies land requirements as maximums which could result in the failure to provide sufficient lands to meet the anticipated supply within the planning horizon of the Growth Plan.
7. Amendment to Schedule 5.1 of the County Official Plan to add the required settlement area boundary expansion in South Alliston as shown in Figure 3 of this letter.

Additional immigration and displaced housing would increase the County's population forecast

The background demographic work to the Growth Plan, on which the County's MCR work was based, was completed prior to the Federal government's announcement in November 2022 that it would increase immigration to 500,000 residents annually starting in 2025. Factoring in additional immigration (assuming the increase to 500,000 people/year is sustained through to 2051) we estimate that approximately 71,000 additional people would have to be accommodated in the County to 2051. This would require substantially more land in the County overall to house these residents.

In addition, it is our opinion that the displacement of housing demand for grade-related units from the GTA from York and Peel Regions will generate additional demand for this form of housing in Simcoe County, and in Alliston in particular. Factoring in these external trends, we believe that there are significant demographic forces (higher immigration levels not accounted for in the original forecasts of the Growth Plan and increased demand for grade-related housing in commuting distance of Peel and York Regions) the County and Province should consider when finalizing its forecasts to 2051 and that could lead to planning for higher population and employment forecasts than those currently contained in the Growth Plan. Taken over the entire County, this could require approximately 2,200 hectares of new community area County-wide (mainly directed to primary settlement areas with servicing potential), which would be another 1,000 hectares beyond the County's current estimates, and 800 hectares beyond our June 2022 LNA estimate.

Final adjustment to the County's LNA to focus growth in the Southern Regional Market Area

The County's March 31, 2022 Growth Forecasts and Land Needs Assessment (prepared by Hemson Consulting) establishes two Regional Market Areas ("RMA"), being the Northern and Southern RMA for the County. We agree with this approach as it recognizes the fundamentally different market and growth pressures for the municipalities within driving distance of the GTHA and those further north. In particular, the report notes that:

"Using two regional market areas acknowledges the historical growth trends and patterns of settlement described in Section 2 of this report. Specifically:

The faster growing Southern RMA has strong commuting connections to the Greater Toronto Area and Barrie while the Northern RMA, as a whole, exhibits more moderate growth where people tend to either work locally or in Barrie or are among the many young retirees attracted to the communities in the north.

Much of the growth pressure is in the Southern RMA, while much of the vacant land is in the Northern RMA. However, the growth pressures in the south—arising mainly from commuters to the Greater Toronto Area—cannot be entirely satisfied by developing in the north. Nor would it be good planning to significantly extend people's commuting distance just because there are large legacy designations in parts of the Northern RMA."

While the report appropriately applies a market contingency rate of 15% for Employment Areas, it provides no indication of a similar contingency for Community Areas and does not address the requirement to make adjustments for Employment and Community Lands that may not develop within the horizon of the Plan. The 2020 Provincial Land Needs Assessment Methodology (“LNA”) requires such adjustments be made. In particular Component 6 of the Province’s LNA states that:

“Adjustments

- *Final adjustments to land need may be made in order to account for:*
- *Extremes of need because of unusually low or high vacancies at the time of analysis such as a vacancy adjustment related to maintaining a healthy rental vacancy rate over the planning horizon;*
- *Constrained land within the settlement area that requires additional infrastructure (e.g. servicing, transit, highways);*
- ***Lands that may not develop within the horizon of the Plan due to other factors such as landowner choice to not develop for the purposes they are designated for;***
- *The length of the planning process to make lands ready for development; and,*
- *Other economic (e.g. provision for major businesses) and demographic (e.g. increases in immigration and emigration) considerations not anticipated in growth scenarios used in the initial municipal analysis.”*

The Hemson report acknowledges that there are significant vacant lands in the Northern RMA that are too far from the growth pressure in the south of the County, however, it does not make an adjustment to account for these lands not developing within the horizon of the Plan. Such an adjustment is required to ensure that sufficient land is provided to achieve the County’s minimum forecast of the Growth Plan in the Southern RMA.

As per the MGP LNA conducted in our background work, the Northern RMA contains approximately 800 hectares of vacant lands in Rural Settlements and 600 hectares in Designated Greenfields. Assuming the County-wide Designated Greenfield Density of 37 residents and jobs per hectare, between 200-400 hectares of additional Community Land should be accommodated in the Southern RMA Primary Settlement Areas (particularly Alliston) beyond the land need identified by the County.

It is also our opinion that an increased market contingency for Employment Areas of 30% would be more appropriate given the dispersal of employment areas and uncertainty in realizing employment areas in the County – this would require additional employment lands to be designated, particularly where they can add to existing employment areas, such as the one south of Alliston.

Conclusion

For the reasons noted in this letter, we believe the Province should amend COPA 7 prior to final approval to include the Harvest lands as Settlement Areas to meet growth needs in the Town and County to 2051, and update COPA 7 with the suggested modifications contained herein.

In support of these request, we are attaching our prior submissions to the Town and County, which include:

- Letters to the County dated June 4, 2021, June 30, 2021, October 25, 2021, and June 13, 2022 providing comments on the Municipal Comprehensive Review, our 2016 Designated Greenfield Area Supply Analysis, and Settlement Area Boundary Request for the Harvest Lands in South Alliston, and our updated Land Needs Assessment and 2021 Designated Greenfield Supply Analysis and comments on the County's draft Land Needs Assessment;
- Letters from NTCBI to the Town and County dated January 27, 2022 and February 4, 2022 providing comments on the County's draft Land Needs Assessment ("LNA") and response to the Town's Settlement Area Boundary Expansion Evaluation Criteria, and an Infrastructure Financing Commitment proposal from the NTCBI to the Town for the Harvest Lands.

If you have any questions or wish to discuss this letter, please do not hesitate to contact the undersigned at any time.

Yours very truly,
Malone Given Parsons Ltd.



Matthew Cory, MCIP, RPP, PLE, PMP

Principal, Planner, Land Economist, Project Manager

cc. Glenn Pitura, Group Manager NTCBI & clients
Mayor and Town Council
Blaine Parkin, CAO, Town of New Tecumseth
Mark Aitken, CAO, Simcoe County

Appendices:

- Appendix A: Settlement Area Boundary Expansion Criteria
 - Appendix B: Harvest Lands Conceptual Master Plan
- Previous Correspondence to County and Town
- Appendix C: Municipal Comprehensive Review – Special Council Meeting Comments dated June 4, 2021
 - Appendix D: Comments on Simcoe County's Municipal Comprehensive Review, MGP's 2016 Designated Greenfield Area Supply Analysis & Settlement Area Boundary Expansion Request dated June 30, 2021
 - Appendix E: Comments on Simcoe County's Draft Land Needs Assessment dated October 25, 2021
 - Appendix F: Response to Simcoe County's Land Needs Assessment dated June 13, 2022
 - Appendix G: NTCBI Infrastructure Financing Commitment Letter to the Town of New Tecumseth dated January 27, 2022