

SUBMITTED VIA ERO POSTING

Files: P-2512, P-2805

**February 3, 2023**

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

**Attention:** Julianna Zhuo  
Senior Planner (Acting) | Community Planning & Development (East) Unit,  
Municipal Affairs and Housing

**RE:** ERO Number 019-6113  
Ministry Reference Number 43-OP- 221936  
Approval of the County of Simcoe Official Plan Amendment No. 7

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KLM Planning Partners Inc. is the land use planning consultant for Bellaire Properties Inc. and Filren Corporation (the “**client**”). Our clients have active development applications in the Town of Innisfil (“**Town**”), specifically the Lefroy Settlement Area Management Inc. (“**LSAMI**”) Parcels 1 and 4, within the Settlement Area of Lefroy-Belle Ewart. **The purpose of this letter is to request revisions to the Town of Innisfil Official Plan to assist in the delivery of approximately two hundred thirty-five (235) residential units to support the Provinces goal of constructing 1.5 million new homes by 2031.**

The lands are identified on a context map attached to this letter, and are described as follows:

- Parcel 1 (“**P1**”) – The lands are legally described as Part of Lot 21 and Part of Lot 22, Concession 4, located at the southeast corner of 20th Sideroad and Belle Aire Beach Road. The P1 draft plan of subdivision was draft approved by the Ontario Municipal Board (“**OMB**”) on June 27, 2008.
- Parcel 4 (“**P4**”) – The lands are legally described as Concession 3, Part Lot 21 and are municipally known as 833 and 775 20<sup>th</sup> Sideroad, located at the southeast corner of

Killarney Beach Road and 20th Sideroad. The P4 draft plan of subdivision was also draft approved by the OMB on June 27, 2008.

Schedule 'B3' of the Town of Innisfil Our Place Official Plan, 2018 ("**Town OP**") designates the above noted lands as follows:

- P1 – 'Residential Low Density 1', 'Residential Low Density 2', 'Neighbourhood Commercial', 'Parks and Open Space' and 'Key Natural Heritage Features & Key Hydrologic Features'.
- P4 – 'Residential Low Density 1', 'Residential Low Density 2', 'Neighbourhood Commercial', 'Parks and Open Space', 'Community Space' and 'Key Natural Heritage Features & Key Hydrologic Features'.

Our clients are committed to delivering needed housing for both the County and the Town, and we have actively monitored the County of Simcoe ("**County**") Municipal Comprehensive Review ("**MCR**") and Land Needs Assessment as it relates to the implementation of the Town OP and the development of the above noted lands. While we understand that ERO Number 019-6113 is focused on the review and approval of County Official Plan Amendment No. 7, this letter is directed at proposed amendments to the Town OP.

## **1.0 PROPOSED AMENDMENT TO THE TOWN OP RELATED TO LSAMI P1**

Commercial Block 517 on the LSAMI P1 draft plan of subdivision, identified as Block 190 on Registered Plan 51M-1014 attached herein, is currently designated 'Neighbourhood Commercial' on Schedule 'B3' to the Town OP. The 'Neighbourhood Commercial' designation currently permits a series of commercial, office and institutional uses, with live work uses that incorporate residential uses on the second floor of at grade commercial uses also permitted. Based on the supply of existing and future commercial space in the Town, commercial uses on the subject site are not viable. Our clients have actively sought retail tenants for the lands for eight (8) years with no interest expressed. As such the lands are currently vacant.

**On this basis, we respectfully request that Block 190 on Registered Plan 51M-1014 be redesignated from 'Neighbourhood Commercial' to 'Residential Low Density 2'.** The Town OP permits a density of between 13 to 25 units per net hectare within the Residential Low Density 2 designation. The effect of this request would be the provision of approximately twelve (12) additional residential units to support the urgent need for attainable housing in the Town, County and Province.

## **2.0 PROPOSED AMENDMENTS TO THE TOWN OP RELATED TO LSAMI P4**

### *SOUTHEAST CORNER OF KILLARNEY BEACH ROAD AND 20<sup>TH</sup> SIDEROAD*

LSAMI P4 is divided into two (2) separate development areas as a result of an existing open space corridor which traverses the lands that is remaining in situ; an area in the northwest corner with access from Killarney Beach Road, consisting of a commercial block, sixty (60) single detached

dwelling units fronting onto an internal public right-of-way; and, the balance of the lands in the southern half of the property, with access from 20<sup>th</sup> Sideroad and Killarney Beach Road, which consists of a park block, stormwater management block, school block, open space blocks and single detached and townhouse dwelling units. Notwithstanding servicing connections and trail linkages between the two areas, there is no vehicular connection across the open space corridor. As such the two areas will function independent of one another.

The portion of the lands in the northwest corner are currently designated 'Neighbourhood Commercial' and 'Residential Low Density 2' on Schedule 'B3' to the Town OP. With the isolation of this development area from the balance of the LSAMI P4 lands and the direct access to Killarney Beach Road, which is identified as an east/west major collector roadway in the Town OP, a land use designation which permits greater residential density is appropriate.

It is noted that Section 10.1.31 of the Town OP provides that the Residential Medium Density designation will generally be located near the intersections of arterial roads and in proximity to commercial, institutional, parkland and existing and potential future transit facilities.

**On this basis, we respectfully request that the northwest quadrant of the LSAMI P4 lands as identified on the attached context map be redesignated from 'Neighbourhood Commercial' and 'Residential Low Density 2' to 'Residential Medium Density' with a site-specific maximum building height of 5.0 storeys.** The Town OP permits a density of between 25 to 60 units per net hectare within the Residential Medium Density designation. The effect of this request would be the provision of approximately ninety (90) to two hundred-seventeen (217) residential units, an increase of approximately thirty (30) to one hundred fifty-seven (157) residential units from that currently approved to support the urgent need for attainable housing in the Town, County and province.

#### *LANDS DESIGNATED RESIDENTIAL LOW DENSITY 1*

The portion of the LSAMI P4 lands adjacent to Church Drive and certain lands located further south are designated 'Residential Low Density 1' on Schedule 'B3' to the Town OP. These lands are identified on the context map attached to this letter. The only residential unit type permitted in the 'Residential Low Density 1' designation are single detached dwellings, whereas the 'Residential Low Density 2' designation permits single detached dwellings as well as semi-detached dwellings, townhouse dwellings and duplexes, providing much more flexibility and variability in the unit types which can be provided. **With the intent to provide a greater flexibility in the types of residential uses permitted in order to respond to market demands for smaller more attainable forms of housing, we respectfully request that the lands adjacent to Church Drive and certain lands located further south within the LSAMI P4 lands be redesignated from 'Residential Low Density 1' to 'Residential Low Density 2'.** The effect of this request would be the provision of approximately one hundred-seventeen (117) residential units, an increase of approximately fifty-seven (57) residential units from that currently approved to support the urgent need for attainable housing in the Town, County and province. Additional commentary as to the rationale for this requested amendment is provided in our discussion related to the deletion of policy 10.2.14 in Section 3.0 of this letter below.

### 3.0 PROPOSED GENERAL AMENDMENTS TO THE TOWN OP

The Town OP includes a series of area-specific and site-specific policies that direct the development of the LSAMI P1 and P4 lands. Relevant policies are identified below.

#### *AREA-SPECIFIC POLICIES AS IDENTIFIED ON SCHEDULE E1 (APPLICABLE BOTH P1 AND P4)*

- *Section 24.1 – A range and variety of dwelling unit types shall accommodate the various household types expected in Lefroy. In the Greenfeld Lands, it shall be achieved in the following manner:
  - i) *Not more than 25% of the units shall be townhouses and other ground-related multiple attached units; and,*
  - ii) *Not more than 14% of the units shall be semi-detached dwelling and small lot single detached dwellings.**

This policy applies across the entirety of the P1 and P4 lands, and is intended to ensure that a higher supply of larger single detached units is provided by limiting the overall percentage of townhouse, semi-detached and small lot singles detached units. **We respectfully request that this policy be deleted in its entirety and reference to same on Schedule 'E1' on the P1 and P4 lands be deleted.** This will enable the market to dictate the type and quantity of various unit types to be provided, and permit the planning for a higher percentage of units which are generally smaller in size and more affordable (e.g., semi-detached and townhouse dwelling units), which will contribute to providing more attainable housing in the Town, County and Province. Furthermore, it is our opinion that single, semi-detached and townhouse forms of housing are compatible with one another and that there is no clear rationale for discouraging a more appropriate mix of housing in the community. Finally, this policy framework was implemented in 2008; 15 years ago, when the land use planning framework and access to housing was significantly different. It is appropriate to consider the amendments at this time.

- *Section 24.4 – On the south side of Killarney Beach Road, within the area identified as Policy 24.4, the permitted residential uses shall be limited to live / work buildings. The live/ work buildings may contain a range of retail, personal service and office uses on the ground floor.*

This policy applies only to the portion of the lands in the northwest quadrant of the P4 lands designated 'Neighbourhood Commercial' as outlined in our request for redesignation in section 2.0 of this letter. **In order to facilitate our request to redesignate these lands from 'Neighbourhood Commercial' and 'Residential Low Density 2' to 'Residential Medium Density', we respectfully request that this policy be deleted in its entirety and reference to same on Schedule 'E1' be deleted.**

#### *Site-specific Policies as identified on Schedule D1 (applicable to P4):*

- *Section 10.2.14 – New lots which abut existing lots along Church Drive in Lefroy Belle-Ewart shall not be less than 21 metres in width measured at the rear lot line where it abuts the existing lots.*

This policy applies to a strip of land directly adjacent to lots fronting onto Church Drive, and is intended to facilitate the provision of transitional lot sizes between the large established properties along Church Drive and smaller lots on adjacent lands designated for development. The effect is such that the lands are inefficiently utilized and unit costs are unaffordable for most in the Town given the high costs to develop the lands. Notwithstanding a range of unit types and sizes is directed by Provincial Policy, this can be achieved with more conventional (smaller) lot sizes while still providing an appropriate transition to adjacent properties. **On this basis, we respectfully request that this policy be deleted in its entirety and reference to same on Schedule 'D1' be deleted.**

- *Section 11.3.5 – Despite the policies of this Section, the uses permitted within the 'Community Spaces' designation shall also be permitted on the Neighbourhood Commercial site at the southeast corner of Killarney Beach Road and the 20th Sideroad. Should a Community Space use be proposed, the policies of Section 8 shall apply.*

Should our request for redesignation in Section 2.0 of this letter be accepted, this policy is no longer required. **As such, we would respectfully request that the above noted policies be deleted in their entirety.**

In addition to the above noted area and site-specific policies, the following policy from the Town OP is also relevant specifically as it relates to our request in Section 2.0 herein:

- *Section 10.1.6 – Neighbourhoods should generally be structured to have higher densities around the neighbourhood focal areas, with generally lower densities at the rural and agricultural edges of settlement areas abutting rural and agricultural areas. This arrangement of densities is encouraged to promote walkability and transit efficiency.*

The policy above is reasonable from the perspective of directing the highest residential densities to central areas within a settlement area and lower densities in areas further away from the core. However, the policy does not address areas that may be suited to higher densities by virtue of their specific context, which could include access relative to the classification of adjacent roadways, the presence of existing and planned public service facilities, connectivity with adjacent residential areas, impact on adjacent residential uses, etc. In the case of our request in Section 2.0 above, we respectfully request that Section 10.1.6 be modified by adding the following sentence after the last sentence in the paragraph:

*“Notwithstanding the above, greater densities may be permitted at the rural and agricultural edges of settlement areas where the lands are located at an intersection of collector and/or arterial roads, are located in close proximity to existing and planned public service facilities, and enhance the character of the community while not creating any undue, adverse impacts on adjacent properties.”*

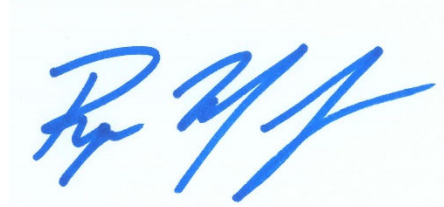
The requests as noted herein are all aimed to assist in achieving the provincial goal of constructing 1.5 million new homes by 2031. This is an ambitious target that requires a re-examination of all

levels of policy to look for efficiencies where they can support the delivery of additional housing units. The requests as noted herein combined will assist in providing approximately two hundred thirty-five (235) additional residential units from that currently approved, and contribute to the development of Lefroy-Belle Ewart as a complete community by providing needed attainable housing.

We would be pleased to meet with Provincial staff to discuss the contents of this letter. Should you have any comments or questions, we can be reached at [rmino@klmplanning.com](mailto:rmino@klmplanning.com) and [tschilling@klmplanning.com](mailto:tschilling@klmplanning.com).

Yours very truly,

KLM PLANNING PARTNERS INC.



Ryan Mino-Leahan, MCIP, RPP  
Partner



Tim Schilling, MCIP, RPP  
Senior Planner

cc: Client

Attachments (3)


# CONTEXT PLAN




NTS

 LSAMI P1

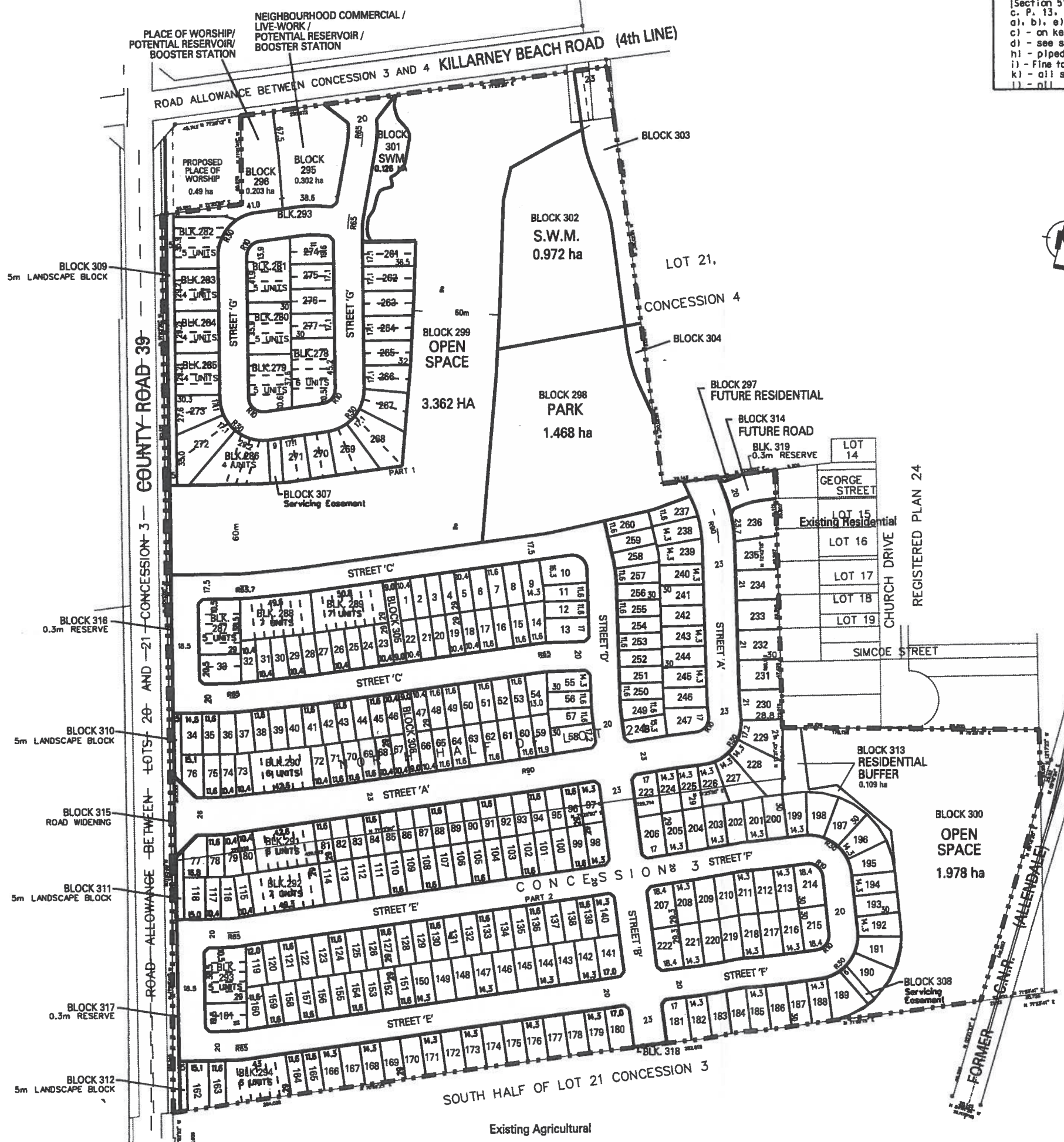
 LSAMI P4

 Block 517 – LSAMI P1 Lands Subject to Request for Official Plan Amendment

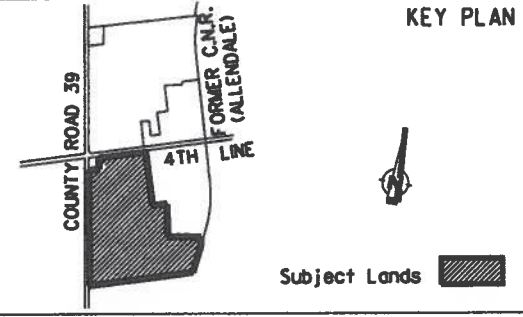
 LSAMI P4 Lands Subject to Request for Official Plan Amendment







**ADDITIONAL INFORMATION:**  
 [Section 51(17) of the Planning Act, R.S.O. 1990, c. P. 13, as amended to April 11, 1997]  
 a) - b) - on plan  
 c) - on key plan  
 d) - see statistics  
 h) - piped water to be installed by developer  
 i) - Fine to medium sand to Silty Sand & Sandy Silt to Clayey Silt  
 k) - all services to be made available by developer  
 l) - all



**WESTON CONSULTING GROUP INC.**

**OWNER'S CERTIFICATE:**  
 I authorize Weston Consulting Group Inc. to prepare and submit this plan for draft approval.  
 ORIGINAL SUBMISSION SIGNED BY OWNER  
 Date: \_\_\_\_\_  
 ORIGINAL SUBMISSION SIGNED BY OWNER  
 Date: \_\_\_\_\_

**SURVEYOR'S CERTIFICATE:**  
 I hereby certify that the boundaries of the lands being subdivided and their correct relationship to the adjacent lands are accurately and correctly shown on this plan.  
 ORIGINAL SUBMISSION SIGNED BY SURVEYOR  
 Date: \_\_\_\_\_

**DEVELOPMENT STATISTICS:**

Residential Single Family (Lots 1-32, 34-160, 162-260):	10.020 HA
Residential Semi-detached (Lots 33, 161, 261-277):	1.207 HA
Residential Townhomes (Blocks 278-294):	2.047 HA
Neighbourhood Commercial/Live-Work/Place of Worship/Potential Reservoir Booster Stn. (Block 295):	0.302 HA
Place of Worship/Potential Reservoir Booster Stn. (Block 296):	0.203 HA
Future Residential (Block 297):	0.003 HA
Park (Block 298):	1.468 HA
Open Space (Blocks 299-300):	5.340 HA
Storm Water Management (Block 301-302):	1.098 HA
Public Land (Blocks 303-304):	0.347 HA
Traffic / Servicing (Blocks 305-306):	0.102 HA
Servicing Easement (Blocks 307-308):	0.045 HA
Landscape Block (Blocks 309-312):	0.157 HA
Residential Buffer (Block 313):	0.109 HA
Future Road (Block 314):	0.073 HA
Road Widening (Block 315):	0.186 HA
0.3 m Reserve (Blocks 316-319):	0.021 HA
<b>ROAD:</b>	<b>6.282 HA</b>
<b>TOTAL:</b>	<b>29.010 HA</b>

**DRAFT PLAN OF SUBDIVISION**  
 Part of Lot 21, Concession 3,  
 Part of Cedar St. and Lot 12 Registered Plan 24  
 Town of Innisfil  
 County of Simcoe



**DEVELOPMENT ANALYSIS:**

	Whole Lots	Part Lots	Total Lots
Residential TOWNHOMES (6.7 m):	91 u	-	91 u
Residential SEMI-DETACHED (8.55 m):	38 u	-	38 u
Residential SINGLE FAMILY (10.4 m):	35 u	-	35 u
Residential SINGLE FAMILY (11.6 m):	129 u	-	129 u
Residential SINGLE FAMILY (14.3 m):	87 u	-	87 u
Residential SINGLE FAMILY (21 m):	7 u	-	7 u
<b>TOTAL:</b>	<b>387 u</b>	<b>-</b>	<b>387 u</b>

**WESTON CONSULTING GROUP INC.**  
 301 Midway Avenue, Unit 18  
 Vaughan, Ontario, L4L 5R3  
 Phone: (905) 739-9080 Fax: (905) 739-9837

File Number: 3657  
 Drawing Number: **D3**  
 Date Drawn: 24 JUN 08  
 Drawn By: S.B.  
 Checked By: T.C./R.G.  
 Date Revised:  
 CAD: 3652/draft plan/ 2008/3657 P4 DP 03.dwg