

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

February 2, 2023
File: 6185

**RE: County of Simcoe Official Plan Amendment, OPA No. 7 (ERO 019-6113) – Comment Letter
8569 5th Line and 8512 6th Line, Township of Essa**

Weston Consulting is the planner for Angus Manor Park Developments Inc., the owner of the lands located at 8569 5th Line and 8512 6th Line in the Township of Essa (herein referred to as the “subject lands”). The subject lands are located adjacent to the east side of the Angus Settlement Area Boundary. The purpose of this letter is to provide a formal submission as it pertains to ERO Posting 019-6113 and to provide comments on the County of Simcoe’s Official Plan Amendment No. 7 (“OPA 7”).

Comments on OPA 7

On behalf of the landowner, we have been engaged in monitoring and participating in the County of Simcoe’s Municipal Comprehensive Review (MCR) process. We have reviewed OPA 7 and are in general support of the proposed policy direction. We note below specific policies which we’d like to highlight our agreement and support of:

- Policy Section 3.2.2 which directs development to be focused towards Settlement Areas and places priority on directing growth to Category 2 lands.
- Policy Section 3.2.3 which identifies Angus as a Category 2 – Settlement Area, which is an area that has a delineated built boundary and existing or planned municipal water and wastewater systems. The Township of Essa does not maintain any Category 1 lands.
- Policy Section 3.2.26 which indicates for Essa a Designated Greenfield Area (DGA) land need of 134.8 gross hectares for community uses. This additional DGA is to be provided through a settlement area expansion.

The above policies highlight that Angus is a Settlement Area in the Township of Essa where growth is to be focused. As part of the County of Simcoe’s MCR process, Weston Consulting, on behalf of the landowner, has submitted a letter in support of the inclusion of the subject lands within the Angus Settlement Area (refer to Appendix 1). The subject lands represent an ideal location for an expansion as they are well positioned geographically, situated directly east of Angus’s settlement boundary, are in close proximity to an existing residential subdivision serviced with transportation and water and sewer services and are not heavily encumbered environmentally. It is our opinion that a settlement area expansion to include the subject lands is appropriate and will assist in accommodating the community use land need required in the Township of Essa.

Thank you for the opportunity to submit these comments. We are open to future discussions regarding this matter. If you have any questions, please contact Jenna Thibault at ext. 309.

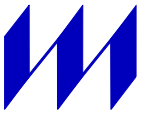
Yours Truly,
Weston Consulting

Per:



Jenna Thibault, BSc, MPL, MCIP, RPP
Associate

Appendix 1 – Municipal Comprehensive Review – Submission Letter dated May 28, 2021

**WESTON
CONSULTING**

planning + urban design

County of Simcoe
1110 Highway 26
Midhurst, ON
L9X 1N6

May 28th, 2021
File 6185

Attn: Warden George Cornell and Members of County of Simcoe Council

**RE: Municipal Comprehensive Review – Submission Letter
8569 5th Line and 8512 6th Line
Township of Essa**

Weston Consulting is the planner for Angus Manor Park Developments Inc. the owner of the lands located at 8569 5th Line and 8512 6th Line in the Township of Essa (herein referred to as the “subject lands”). The purpose of this correspondence is to provide a formal submission as part of the County of Simcoe’s Municipal Comprehensive Review (“MCR”) on behalf of the landowner in support of the inclusion of the subject lands within the Angus Settlement Area of the Township of Essa.

Weston Consulting has participated in previous discussions with both County of Simcoe and Township of Essa Staff to discuss this request to expand the Angus Settlement Area to include the subject lands. As part of these discussions, the County advised that they are responsible for allocating growth to all of the settlement areas in Simcoe County which requires them to evaluate numerous factors including the hierarchy of settlement areas, infrastructure capacity and availability, and intensification of existing built boundaries.

A. County of Simcoe Municipal Comprehensive Review

The County of Simcoe is in the process of updating their Official Plan as part of the Municipal Comprehensive Review to better align the Plan with the current Provincial policy regime and to properly guide population and employment growth within the County. It is our understanding that Simcoe County is currently undertaking a Preliminary Land Needs Assessment, as per the Workplan contained in the February 25, 2021 Update on the County’s Municipal Comprehensive Review Report (PAC-2021-076).

A key component of the MCR involves consultation with various stakeholder groups and receiving comments to help inform the process. It is the landowner’s intention to be involved in the MCR process and to have this correspondence included as a written submission in the published agenda for the Special Council Meeting scheduled for June 8, 2021.

B. Description of the Subject Lands & Site Context

The subject lands are located adjacent to the Angus Settlement Area in the Township of Essa, directly east of the settlement boundary (**Figure 1**). The subject lands are irregular in shape with a lot area of 67.87 hectares (167.72 acres) and 605 metres of frontage on 5th Line and 236 metres of frontage on 6th Line. The subject lands currently contain a single-detached dwelling with an associated accessory building. The site contains a small area of land (approximately 17% of the total lot area) encumbered and regulated by the Nottawasaga Valley Conservation Authority (NVCA) which appears to include woodlands and two watercourses that bisect the property as per the NVCA Regulation mapping.

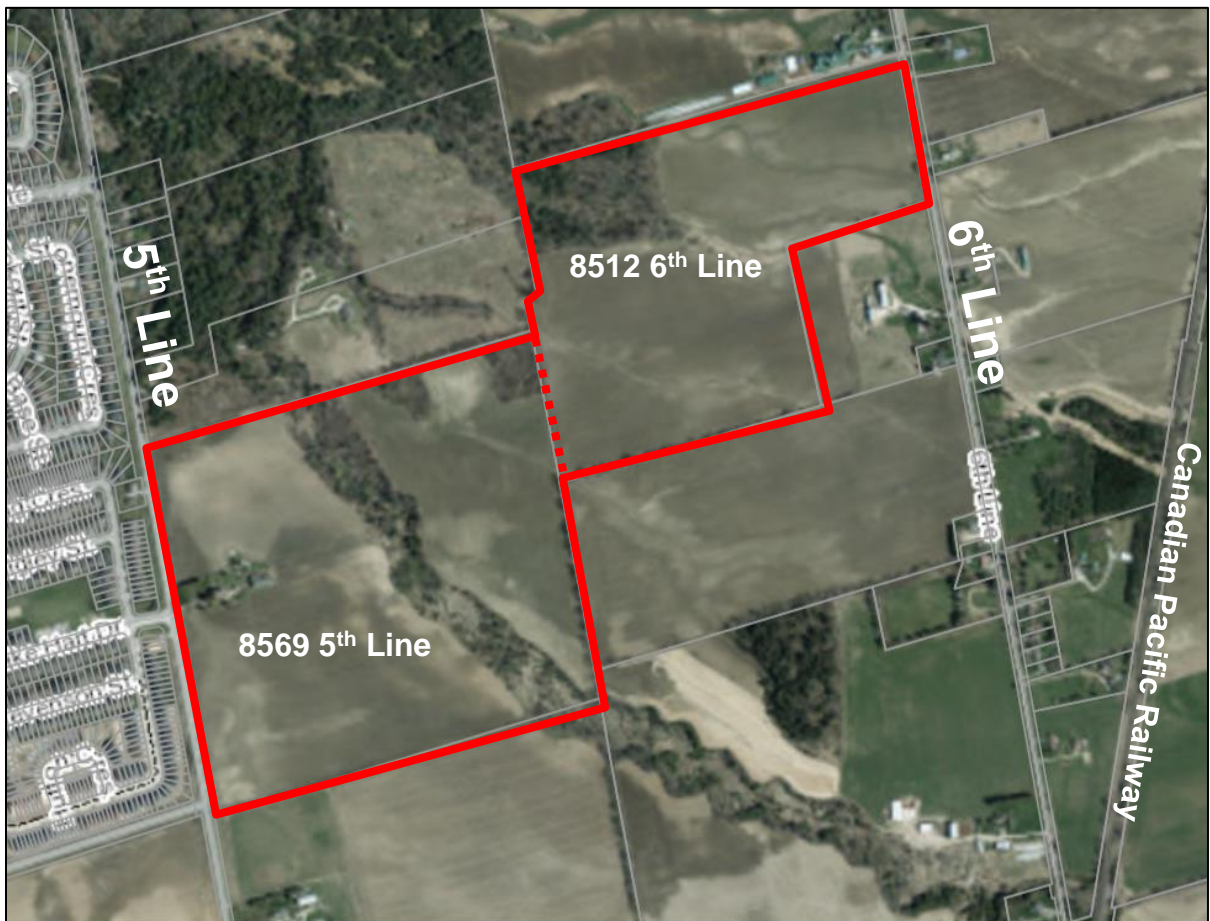


Figure 1: Air Photo of the Subject Lands

B1. Surrounding Land Uses

The surrounding area consists of a mix of land uses, as follows:

North: The lands to the north consist mostly of cultivated cropland with accessory agricultural buildings, single detached dwellings on larger rural lots and natural heritage features including wetlands and woodlands.

East: Single detached dwellings on larger rural lots, and cultivated cropland with accessory agricultural buildings are located directly east of the subject lands. To the east of these lands, is the Canadian Pacific Railway.

West: To the west of the subject lands is the Angus Settlement Area, which contains a full range of commercial, residential, institutional and recreational uses. Directly adjacent to the subject lands there is a residential subdivision consisting of semi-detached and detached dwellings, as well as a Mike-Hart Park, a municipal park.

South: The lands to the south of the subject lands consist of cultivated croplands with accessory agricultural buildings, single detached dwellings on larger rural lots, and natural heritage features including wetlands/watercourse and woodlands.

C. Policy Context

C1. County of Simcoe Official Plan

The County of Simcoe Official Plan predominantly designates the subject lands as *Agricultural* with a small portion designated *Greenlands* (**Figure 2**). Lands to the north are designated *Greenlands*, lands to the east and south are designated *Agricultural*, and lands to the west are designated *Settlements*. The *Agricultural* designation identifies *Prime Agricultural Areas* and is intended to protect the lands for long-term use for agriculture. The *Greenlands* designation represents the *natural heritage system* in the County and is intended to protect the natural heritage features and areas and ecological functions. Lastly, the *Settlements* designation is intended to be the focus of population and employment growth.

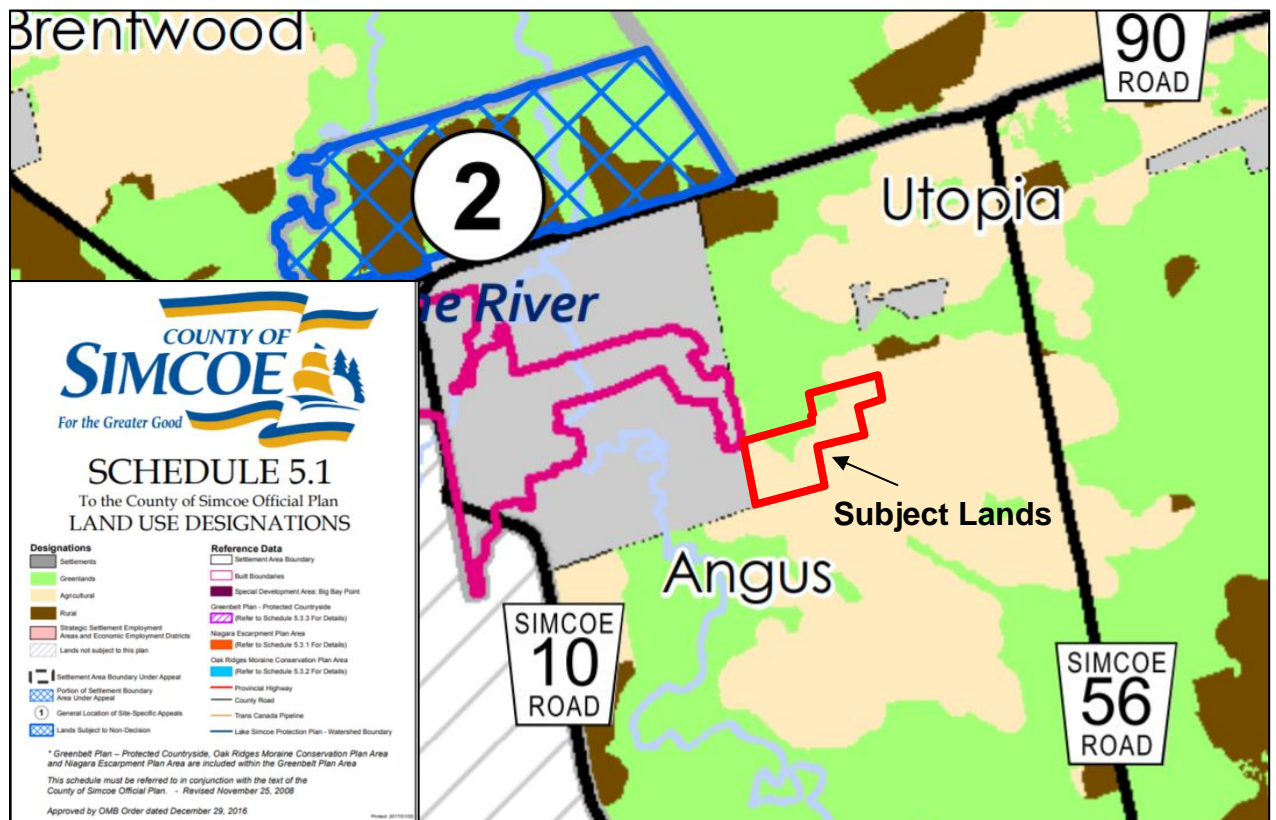


Figure 2: County of Simcoe Official Plan Schedule 5.1: Land Use Designations

The Growth Plan for the Greater Golden Horseshoe, 2020 (“Growth Plan”) provides direction on settlement area boundary expansions and maintains policies which allow for the inclusion of prime agricultural areas within the boundary in certain instances. Section 3.5.17 of the County’s Official Plan provides similar policies, recognizing that in some cases, this is appropriate. This section of the County’s Official Plan states the following:

Settlement area boundary expansions may occur only in accordance with an approved municipal comprehensive review that is consistent with the growth management study in 3.5.8 and where it has been demonstrated that:

- 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;*
- The expansion makes available sufficient lands for a time horizon not exceeding 20 years, based on the analysis provided for in subsection (a) above;*
- 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;*
- 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.*

The above policies are to be examined during a Municipal Comprehensive Review to determine which settlement areas require expansion to accommodate the forecasted growth allocated by the Growth Plan and to determine which lands are to be included within the boundary. As per Schedule 3 of the Growth Plan, the County of Simcoe is expected to have a population of 555,000 and 198,000 jobs by the year 2051. It is the County's responsibility, in consultation with the public and lower-tier municipalities, to determine the allocation strategy for each lower-tier municipality and their respective settlement areas.

The Growth Management Strategy in the County of Simcoe Official Plan states that growth and development will be directed to settlement areas where it can be effectively serviced, with a particular emphasis on *primary settlement areas*. The *primary settlement areas* in Simcoe County include the Town of Collingwood, Town of Midland, Town of Penetanguishene, and the communities of Alcona in Innisfil, Alliston in New Tecumseth, and Bradford in the Town of Bradford West Gwillimbury. Settlement expansions will first be considered for the *primary settlement areas*. Angus is not a *primary settlement area*, but as per Section D of this Letter, it is well positioned to expand to accommodate future population and employment growth in the Township of Essa.

C2. Township of Essa Official Plan

The Township of Essa Official Plan designates the subject lands as *Agricultural* with an *Environmental – Flood Prone Area* bisecting the western portion the site (**Figure 3**). The *Agricultural* designation conforms to the County of Simcoe designation. The intent of this designation is to protect and promote the agricultural resource base of the Township. As can be seen in Figure 3, the subject lands are adjacent to the eastern edge of the Angus Settlement Area.

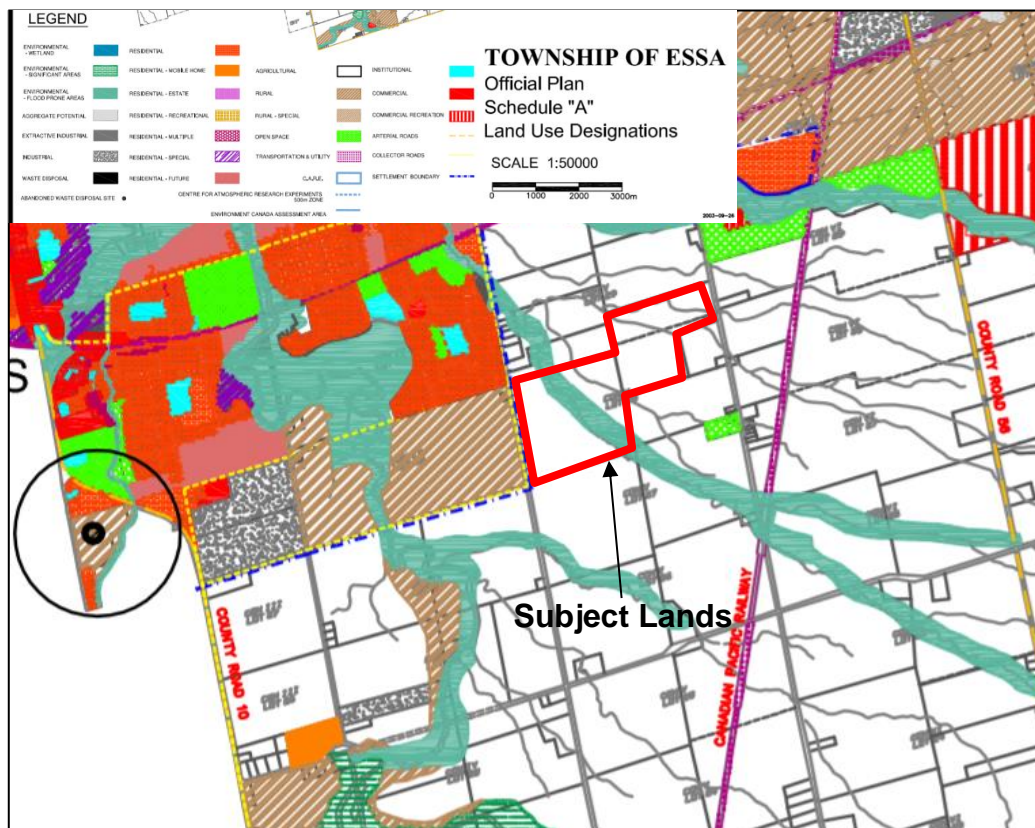


Figure 3: Township of Essa Official Plan Schedule "A" Land Use Designations

Section 3 of the Official Plan contains the Concept of the Official Plan which states that "urban development within the Township is to be primarily directed to the Angus area where it can be serviced with full water supply and sewage disposal facilities." Further, the Growth Management Strategy as contained in Section 5 directs that the majority of growth will occur in three settlement areas, Angus, Thornton, and Baxter. Within the Township of Essa, Angus is a settlement area expected to accommodate the majority of additional future growth.

D. Additional Considerations

D1. Servicing Considerations

On March 27, 2012, the County of Simcoe Council adopted a motion supporting in principle the 'County of Simcoe Water and Wastewater Visioning Strategy' and directed County staff to work with area municipalities and government agencies to promote and facilitate the proposed partnerships, opportunities and recommendations contained within the report. With respect to the Township of Essa, the report found the following:

- "Based on the approved population growth indicated through the Simcoe County's Official Plan, no future negative water servicing gaps are expected to occur as a result of the proposed development within this Municipality; and,

- There is also no net servicing gap for future wastewater flows projected at the Angus Wastewater Treatment Plant, even if all the proposed Township 2031 growth was proposed to occur in Angus.”

While the report does not comment specifically on the Township’s capacity for growth beyond the 2031 timeline, the information in the report indicates that there is a positive servicing gap for both water and wastewater that would permit additional growth.

Preliminary servicing investigations have been conducted for the subject lands. A Preliminary Servicing Due Diligence Report was prepared by Cole Engineering in 2012 to assess potential constraints for storm, sanitary and water servicing. The Report found that development of the subject lands may require two on-site stormwater management pond blocks, with the details of these blocks to be refined during a future development stage. Further, the Report concluded that a sanitary trunk sewer exists on Centre Street, 1200 metres from the subject lands and that the Township had (in 2012) uncommitted reserve capacity for 1540 persons (570 units) beyond the 2031 population and employment growth projections that should be utilized for additional growth in Angus. Lastly, Angus’s well water supply system consists of three treatment plants, six wells and watermains and the Township had undertaken the construction of a watermain on Willoughby Road from County Road 10 to 5th Line, to the west of the subject lands. The Report also notes that watermains were constructed for the residential subdivision directly to the west of the subject lands.

This preliminary investigation concluded that, at that time, there was capacity at the water and wastewater treatment facilities for further growth in Angus beyond that projected for 2031. The provision of municipal servicing for the subject lands will be further reviewed and discussed with the Township and County.

D2. Compatibility Considerations

The subject lands are situated to the east of 5th Line, adjacent to Angus’s settlement boundary. We recognize that a portion of the subject lands is constrained with woodlands and a watercourse that would require further evaluation and protection but the majority of the subject lands do not contain environmental constraints. The subject lands are immediately adjacent to existing development serviced with municipal infrastructure. If the subject lands were to be included within the Angus Settlement Area, the landowner would develop the lands to be compatible with the residential nature of the adjacent uses to the west. Developing the lands for residential uses would not only be compatible with the adjacent neighbourhoods but would not adversely impact the environmental integrity of the natural features on the subject lands.

Additionally, an expansion of the settlement boundary towards the east in closer proximity to Utopia would provide greater economies of scale for the Township servicing and infrastructure. The City of Barrie and Highway 400 are also located to the east of Angus, which would provide residents with closer access to a greater range of services and employment opportunities not currently offered in Angus.

The Township's Official Plan provides policies which direct that Angus is a settlement area expected to accommodate growth. The Township's Official Plan only considers growth targets up to 2031. These figures are anticipated to increase based on the 2051 growth targets released by the Province which the County is reviewing and responsible for allocating to the area municipalities. There are limited opportunities in Angus to expand the settlement boundary. The lands to the north of the boundary are heavily constrained environmentally and entirely regulated by the NVCA, while the lands to the west are constrained by the positioning of the CFB Borden base. The lands to the east and south are less constrained by natural heritage features compared to the lands to the north. If an expansion were to include lands to the south, it may be more suitable for employment uses rather than residential uses given the existing land uses in the southwest portion of Angus. An expansion of the Angus Settlement Area to include the subject lands is a logical expansion of the settlement area for additional residential uses.

E. Concluding Remarks

The subject lands are well positioned geographically, situated directly east of Angus's settlement boundary, are in close proximity to an existing residential subdivision serviced with transportation and water and sewer services and are not heavily encumbered environmentally. These lands, which have the potential to be developed, are being underutilized.

In our opinion, the subject lands are representative of an appropriate expansion of the Angus settlement boundary. Should the County deem it necessary to expand Angus to accommodate future population and employment growth, and to do so in a direction which would capture the subject lands, it is our position that the subject lands would be appropriate to include.

Weston Consulting and the landowner would like to reserve the right to provide further comments on the MCR process as it relates to the future development of the subject lands and respectfully request to be notified of any future reports, public meetings and decisions in relation to this matter. Thank you for reviewing this request. If you have any questions regarding the above comments, please contact the undersigned at extension 309 or Kayly Robbins at extension 315.

Yours truly,

Weston Consulting

Per:



Jenna Thibault, BSc, MPL, MCIP, RPP
Senior Planner

- c. G. Marek, County of Simcoe, Manager of Planning
- D. Amadio, County of Simcoe, Manager of Planning
- J. Daly, County of Simcoe, County Clerk
- A. Powell, Township of Essa, Manager of Planning and Development

G. Ambrose, Angus Manor Park Developments Inc.
R. Guetter, Weston Consulting