

WESTON CONSULTING

planning + urban design

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

February 2, 2023
File 7674

**RE: Planning Letter – County of Simcoe Official Plan Amendment,
OPA No. 7 (ERO 019-6113)
Southeast Corner of Shore Acres Drive and 20th Sideroad, Innisfil**

Weston Consulting is the planner for the West family, the owner of the lands located at the southeast corner of Shore Acres Drive and 20th Sideroad in the Town of Innisfil (herein referred to as the “Subject Lands”). The Subject Lands are located directly outside of the Gilford Settlement Area. 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”).

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 are in support of the policies in OPA 7 that identify that an additional 104.2 ha of Designated Greenfield Area (DGA) lands are required for community uses within Innisfil (this is excluding the 37 ha of land added to the Alcona Settlement Area by OPA 7). We do not have any substantive concerns with OPA 7 but do have some comments as it relates to the matter of servicing as it pertains to settlement area boundary expansion requests.

Category 4 - Rural Settlements and Private Servicing

Policy Section 3.1.1 (Item 9 in OPA 7) directs a significant portion of growth and development to settlement areas that can be effectively serviced, with particular emphasis on primary settlement areas (Lands categorized as Category 1). Gilford has been categorized as a Category 4 – Rural Settlements area. We understand Category 4 – Rural Settlements to be areas that have a municipal water or waste water system (partial services) or have no municipal water or wastewater systems in place. This is a distinction from Category 3 areas which have existing or planned municipal water and wastewater systems.

In taking this opportunity to provide our feedback on OPA 7, we want to highlight that the Subject Lands, located adjacent to the Gilford Settlement Area, have capacity for water and private septic servicing. In our opinion, there should be consideration to treat the idea of servicing the same way whether private or not private. We believe that so long as lands can be serviced, by whatever means, and so long as there are no adverse impacts such as on the environment and human health and safety, that lands which fall within this category should be deemed as ‘serviceable’.

Lands, such as the Subject Lands, are not to be looked past simply because of a lack of public servicing availability.

There is precedent in this regard seeing as development in Gilford relies on private wastewater treatment facilities. The Shore Acres Drive Residential Development for North Town Developments, located at 1291 Shore Acres Drive, is one of these cases. This project has received approval and is directly to the east of the Subject Lands. A 2019 Stormwater Management and Functional Servicing Report, prepared by a.m. candaras associates inc., detailed that the site would be serviced with municipal water and individual private onsite sewage systems. Gilford is not serviced with a municipal sanitary system and a municipal system is not expected to be extended to Gilford within a near time horizon. This development, along with other developments in the area including The Cooks Bay Marina redevelopment project at 1155 Gilford Road, have had to proceed with an on-site, private wastewater treatment and disposal system to be serviced. It is our opinion that subject to the appropriate studies, private servicing is a viable and effective solution for servicing Category 4 – Rural Settlements, demonstrating that it is appropriate to direct growth to Category 4 lands.

Concluding Remarks

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 Gilford Settlement Area (refer to Appendix 1). The Subject Lands are well positioned, situated directly west and north of Gilford's Settlement Area Boundary, represent a logical continuation of previous expansions to the settlement area boundary and satisfy the draft criteria for settlement area boundary expansions that was created by the Town of Innisfil.

We have reviewed OPA 7 and as noted above, support the additional DGA land need allocated for Innisfil. We are in general agreement with the criteria outlined in Section 3.2.29 related to assessing settlement area expansions but suggest that consideration in the policy language be given to acknowledging that private servicing, in certain cases, is just as viable an option as existing or planned infrastructure.

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,

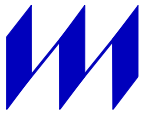
Weston Consulting

Per:



Jenna Thibault, BSc, MPL, MCIP, RPP
Associate

Appendix 1 – Settlement Boundary Expansion Request – Submission Letter dated June 1, 2022



WESTON CONSULTING

planning + urban design

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

June 1, 2022
File 7674

Attn: Greg Marek, Manager of Planning

**RE: Simcoe County Municipal Comprehensive Review
Gilford Settlement Area Boundary Expansion Request
Southeast Corner of Shore Acres Drive and 20th Sideroad, Innisfil**

Weston Consulting is the planner for the West family, the owner of the lands located at the southeast corner of Shore Acres Drive and 20th Sideroad in the Town of Innisfil (herein referred to as the “Subject Lands” or “site”). The purpose of this letter 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 Gilford Settlement Area.

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 align with current Provincial policy and properly guide population and employment growth within the County. Based on a staff report from a Special Council Meeting on the Municipal Comprehensive Review held on April 12, 2022 (CO 2022-117), the County of Simcoe has finalized their Draft Land Needs Assessment and is currently conducting their Provincial Natural Heritage System review and refinement.

A key component of the MCR process 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. In addition to formally submitting this written correspondence to County Staff, we request that this correspondence be included as a written submission for the upcoming June 28 Statutory Public Meeting related to growth management work for the MCR.

B. Description of the Subject Lands & Site Context

The Subject Lands are located at the southeast corner of Shore Acres Drive and 20th Sideroad in the Town of Innisfil. They have a total area of 11.47 ha (28.35 acres). Refer to Figure 1 for an aerial view of the site. The lands are vacant and rural in nature. The Subject Lands are directly west and north of the Gilford Settlement Area in the Town of Innisfil, as defined by the County of Simcoe Official Plan. The site has a total frontage of approximately 500 metres along Shore Acres

Drive and 205 metres along 20th Sideroad. The north and east portion of the site is regulated by the Lake Simcoe Region Conservation Authority (LSRCA), which includes a small watercourse that crosses the Subject Lands.



Figure 1: Aerial View of the Subject Lands

B1. Surrounding Land Uses

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

North: The Subject Lands are bordered by Shore Acres Drive to the North. The South Innisfil Arboretum and Luck Property, a park, is to the north of the Subject Lands.

East: A Metrolinx Rail Corridor servicing regional transit is located directly east of the Subject Lands. In addition, the Town of Innisfil has approved a Draft Plan of Subdivision and Zoning By-law Amendment for a residential development located at 1291 Shore Acres Drive (File Nos.: D12-2017-002 & D14-2017-020). The development features thirty-three (33) single-detached residential lots, two (2) blocks for environmental protection, one (1) block for stormwater management, one (1) road widening block along Shore Acres Drive, one (1) block for parkland and two (2) streets to be conveyed to the town. It is part of the Gilford Settlement Area as defined by the County of Simcoe Official Plan.

West: The Subject Lands are bordered by 20th Sideroad to the west. Agricultural lands are situated on the west side of 20th Sideroad.

South: The Subject Lands are bordered on the south by ten (10) residential lots for single detached dwellings and one (1) small commercial plaza, which are all along Gilford Road. These lands previously formed part of the Subject Lands before being severed into eleven (11) lots. In addition, on the south side of Gilford Road, directly across from such ten (10) residential dwellings previously part of the Subject

Lands, is a newer subdivision of twenty-two (22) single-detached residential dwellings.

C. Policy Context

C1. County of Simcoe Official Plan

The County of Simcoe Official Plan designates the Subject Lands as *Agricultural*. Refer to Figure 2 showing Schedule 5.1: Land Use Designations. The *Agricultural* designation identifies *Prime Agricultural Areas*, with the objective of protecting land for long-term use for agriculture. Lands to the north and west of Shore Acres Drive and 20th Sideroad, respectively, are designated as *Greenlands* and *Agricultural*. The *Greenlands* designation represents the *Natural Heritage System* in the County and is intended to protect natural heritage features and areas and their ecological functions. Lands directly to the south and east of the Subject Lands are designated as part of the *Settlement Area Boundary* of Gilford.

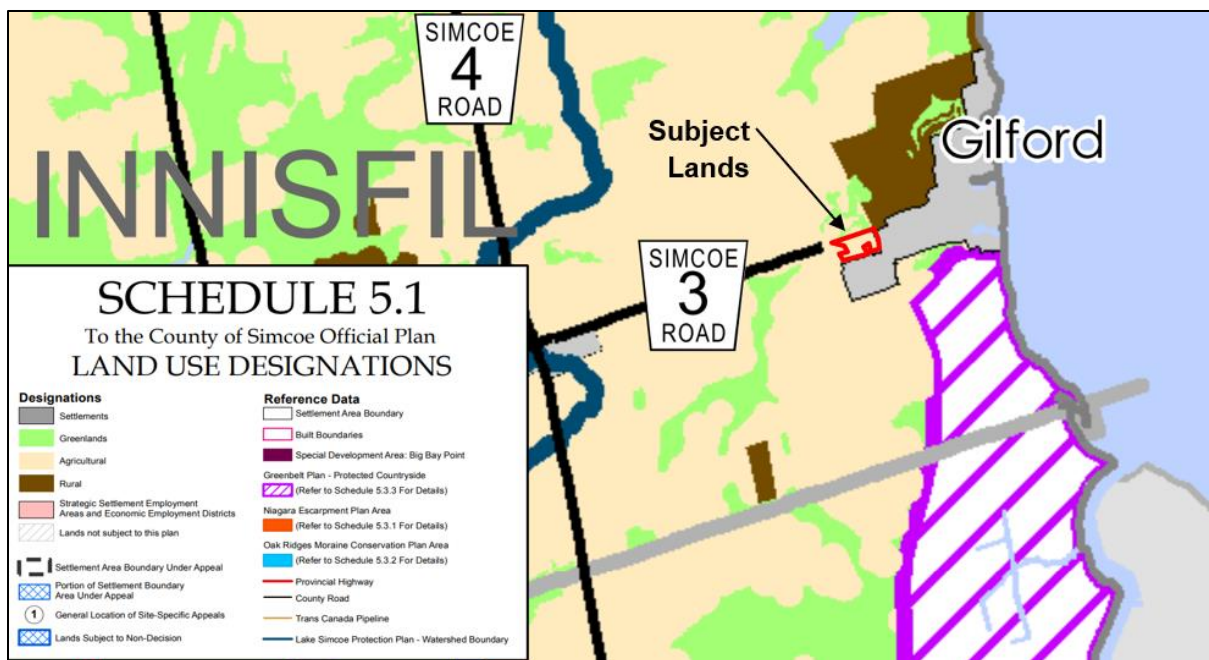


Figure 2: County of Simcoe Official Plan Schedule 5.1: Land Use Designations

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:

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

Although the Subject Lands are considered as *prime agricultural areas*, the criteria for a settlement area boundary expansion, specifically that related to *prime agricultural areas* as noted by County of Simcoe Official Plan Policy 3.5.8 f), can be met. The first criterion is met as the Subject Lands are not a specialty crop area. In addition, most lands outside of the Settlement Area Boundary that would be identified for potential settlement area inclusion are *prime agricultural areas*, *specialty crop areas* or environmentally constrained lands. No reasonable alternatives exist to avoid agricultural lands or for lower priority agricultural lands. Further, the Subject Lands are not suitable for agricultural purposes given that a portion of the lands are regulated by the LSRCA.

Section 3.1.1 of the County of Simcoe Official Plan outlines the Growth Management Strategy, which 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*. Gilford is not a *primary settlement area*, but it is well positioned to expand to accommodate future population and employment growth in the Town of Innisfil.

C2. Town of Innisfil Official Plan

The Town of Innisfil Official Plan designates the Subject Lands as *Agricultural* and *Key Natural Heritage Features & Key Hydrologic Features*. The *Agricultural* designation conforms to the County of Simcoe land use designation, with an intent to protect and promote the agricultural resources in Innisfil. The *Key Natural Heritage Features & Key Hydrologic Features* designation at the north of the Subject Lands is consistent with the small watercourse which traverses the site. The purpose of the *Key Natural Heritage Features & Key Hydrologic Features* designation is to protect natural heritage features in the Town of Innisfil which are outside of the Greenbelt Plan Area. Section 17.1.10 of the Town of Innisfil Official Plan prohibits development or site alteration of lands designated as *Key Natural Heritage Features & Key Hydrologic Features*. It should be noted that any development proposed for the Subject Lands would respect the development limits of existing natural features and include the required buffers.

The land use designations for the Subject Lands and surrounding lands are shown in Schedule B: Land Use and Schedule B10: Land Use - Gilford of the Official Plan. Figure 3 and Figure 4 show that the site is directly adjacent to the Gilford Settlement Area. In addition, a small portion of the Subject Lands, at the east along Gilford Road, are located within the settlement boundary.

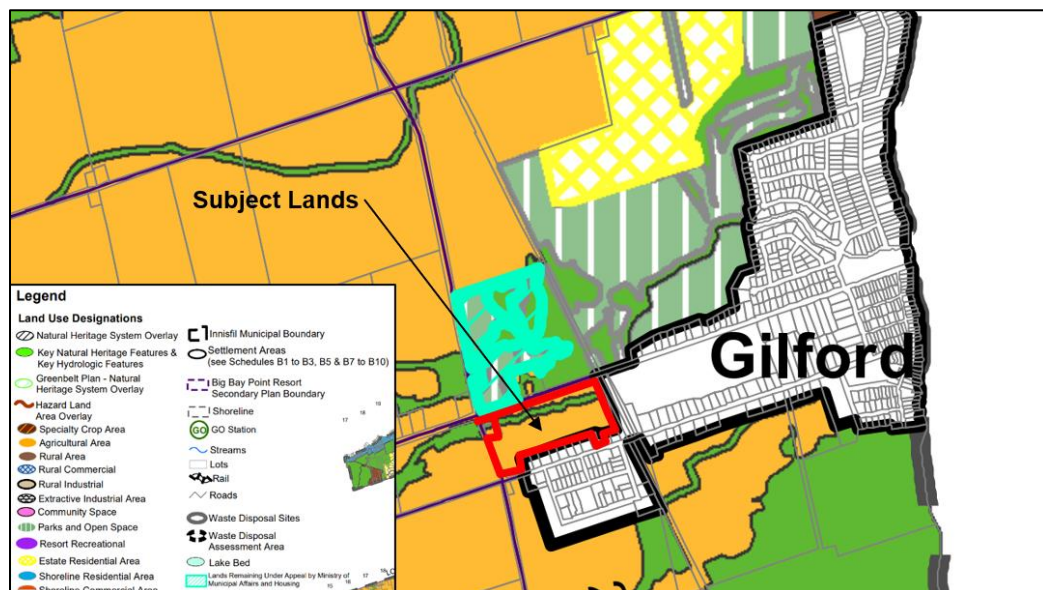


Figure 3: Town of Innisfil Official Plan Schedule B: Land Use

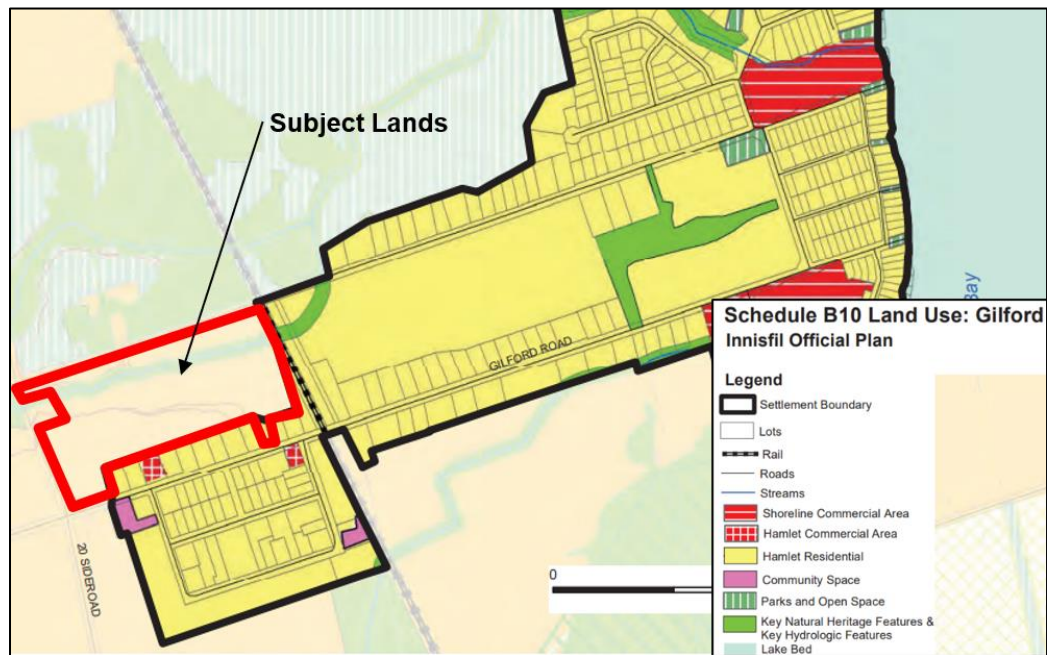


Figure 4: Town of Innisfil Official Plan Schedule B10: Land Use – Gilford

Section 9 of the Official Plan states that growth is to be directed towards the primary settlement area of Alcona. Gilford is identified as a hamlet, where growth is limited to infill within the boundaries of the settlement area. In addition, the *Community Strategic Plan 2020-2030* and *Innovative Innisfil 2030* reports identify goals and objectives for planning and managing strategic growth, promoting economic development and improving service offerings. The plans provide detailed implementation on the direction of growth within designated settlement areas, while providing appropriate protections towards green spaces and agricultural lands. Section 9.8 expands on this by outlining specific policies regarding settlement area boundary expansions. Most notably, expansions to the Settlement Area Boundary can be outlined as part of the MCR process and must address population and employment growth forecasts.

Town of Innisfil Staff Report DSR-176-21, dated December 8, 2021, specifies draft criteria on requests for settlement area boundary expansions. The staff report considers policy recommendations from the County of Simcoe Municipal Comprehensive Review (MCR), as well as recommendations from the County of Simcoe Draft Land Needs Assessment, in forming priority areas for settlement boundary expansions and establishing draft criteria to assess lands for inclusion. Outlined below are the draft criteria.

- a) *There is a demonstrated need for additional land within a particular municipality given the results of a Land Needs Assessment (LNA) that is being completed at the time of a Municipal Comprehensive Review (MCR).*
- b) *The expansion does not result in Designated Greenfield Area (DGA) land area capacity that would exceed the 2051 horizon of the Growth Plan.*

- c) *The expansion area will be informed by applicable water and wastewater master plans and stormwater master plans, as appropriate.*
- d) *The expansion area must be located immediately adjacent/contiguous with an existing Primary Settlement Area or Settlement Area as defined in the Growth Plan.*
- e) *The expansion cannot result in land being added to a settlement if that land is situated in another municipality.*
- f) *Expansion into a Specialty Crop area and lands subject to the Greenbelt Plan is prohibited.*
- g) *The expansion area will avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the water resource system including the quality and quantity of water*
- h) *It should be demonstrated how any adverse impacts on the agri-food network including agricultural operations from expanding settlement areas will be avoided and if avoidance is not possible, minimized and mitigated.*
- i) *The expansion area complies with the minimum distance separation formulae (MDS).*
- j) *Prime agricultural areas are avoided where possible by considering and evaluating alternative locations. Where prime agricultural areas cannot be avoided, lower priority agricultural lands will be used.*
- k) *The expansion area is located where development would support achievement of the Town's density and intensification targets and meets the policy intent of the Town's Official Plan.*
- l) *Significant growth will be directed to Alcona, prioritizing the Major Transit Station Area surrounding the GO Station and areas subject to the Alcona South and Alcona North Secondary Plans*
- m) *The expansion area has appropriately considered matters related to sustainability and climate change.*
- n) *The expansion area would be located to maximize the use of existing infrastructure and public service facilities. The infrastructure and public service facilities needed would be financially viable over the full life cycle of these assets.*
- o) *The expansion area is located where it can support a range and balance of housing (including affordable housing) and employment options.*
- p) *The expansion area will contribute to achieving compact, walkable, sustainable and healthy communities that enhance a sense of place.*
- q) *The expansion area adequately protects and avoids development within key natural heritage features and hydrologic features.*
- r) *The expansion area provides an appropriate rural interface.*

It is our opinion that there are opportunities to expand the settlement area in Gilford to meet the growth objectives laid out in the Town of Innisfil Official Plan and *Community Strategic Plan*. Section D of this letter outlines the reasons why this settlement area boundary expansion request for the Subject Lands is appropriate, including a detailed assessment of how these above noted draft criteria are satisfied. Appendix 1 includes a detailed table outlining how each of the draft criteria for settlement boundary expansions is met.

D. Additional Considerations

D1. Assessment of the Innisfil Draft Criteria for Settlement Area Boundary Expansions

Following policy recommendations from the County of Simcoe MCR and Draft Land Needs Assessment, the Town of Innisfil created detailed draft criteria for settlement area boundary expansions. It is our opinion that the Subject Lands fulfill the criteria established by the Town of Innisfil, with respect to compatibility with adjacent land uses, site servicing and growth management as dictated by the draft Land Needs Assessment. In addition, the Subject Lands are not suitable for agricultural purposes and future development would not pose any potential negative environmental impacts on the Subject Lands or surrounding area. Refer to the Appendix 1 for an assessment of the Subject Lands against the draft criteria.

D2. Compatibility Considerations

The Subject Lands are located at the southeast corner of Shore Acres Drive and 20th Sideroad in the Town of Innisfil. The Subject Lands are an ideal candidate for inclusion into the Gilford Settlement Area as they border the existing Gilford Settlement Area Boundary, and development of the site would be compatible with adjacent uses including residential, natural heritage and agricultural land uses. The development of the lands for residential uses would not only be compatible with the adjacent uses, but would not adversely impact the environmental integrity of the natural features on the Subject Lands through the use of appropriate development limits and setbacks. An environmental impact study would be a requirement through the development approvals process and would ensure that the integrity of any existing nature features is maintained.

The Subject Lands are appropriate for inclusion in the Settlement Area Boundary, to be developed for residential uses, given their close proximity to existing and recently approved residential uses. To the south of the site, the Subject Lands abut the property lines of ten (10) single detached dwellings and one (1) commercial plaza along Gilford Road. These lands are part of the Gilford Settlement Area. In addition, on the south side of Gilford Road, directly across from such ten (10) residential dwellings previously part of the Subject Lands, is a newer subdivision of twenty-two (22) single-detached residential dwellings. To the east of the site, the Town of Innisfil has recently approved a Draft Plan of Subdivision and Zoning By-law Amendment for a residential development located at 1291 Shore Acres Drive (File Nos.: D12-2017-002 & D14-2017-020). The development features thirty-three (33) single-detached residential lots, two (2) blocks for environmental protection, one (1) block for stormwater management, one (1) road widening block along Shore Acres Drive, one (1) block for parkland and two (2) streets to be conveyed to the town. This approved development illustrates how residential development can co-exist adjacent to existing natural features. Existing environmental constraints on this adjacent property were zoned *Environmental Protection* (EP) blocks to ensure no negative impacts to natural features. A ten (10) metre buffer was maintained between the tree line and *Environmental Protection* blocks, with additional grading considerations to maintain appropriate setbacks between residential uses and the post-development regional floodline.

Additional consideration has been given to adjacent agricultural land uses as part of this settlement area boundary expansion request. Adjacent agricultural uses do not contain livestock barns, manure storages or anaerobic digesters. Therefore, the site does not have to meet the requirements to minimize land use conflict through the minimum distance separation formulae (MDS), as specified by the Ontario Ministry of Agricultural, Food and Rural Affairs. Also, the Subject Lands themselves have never been used for agricultural purposes and are not suitable for agricultural purposes given that a portion of the lands is regulated by the LSRCA.

D3. County of Simcoe Land Needs Assessment

Hemson Consulting was retained by the County of Simcoe to conduct its Growth Forecasts and Land Needs Assessment report. In March 2022, a draft copy of the report was published. It outlines the historical growth, framework for analysis, community area land needs assessment and employment area land needs in the County. Most notably, the report states that in order to address additional land needs, a total of 70.2 hectares of new Designated Greenfield Area (“DGA”) will be required in Innisfil. This is additional DGA land beyond the DGA growth which is anticipated to be accommodated by the Orbit transit hub Minster’s Zoning Order (MZO). There is opportunity, and capacity, within the Town of Innisfil for expansion of its settlement area boundaries to capture the additional Community Area land need. Due to the Subject Lands’ location bordering the Gilford Settlement Area, the Subject Lands are well positioned to accommodate the need for additional housing growth. In addition, the total area of the site is only 11.47 hectares in size, with a smaller developable area due to environmental constraints. This is a modest rounding out of the Gilford Settlement Area Boundary and means that the County of Simcoe could reasonably include the Subject Lands in the settlement area, while continuing to accommodate other opportunities for growth across the Town of Innisfil.

D4. Servicing Considerations

The Town of Innisfil Master Servicing Plan Update was published in November 2018. It provides direction on the growth of servicing infrastructure, including water and wastewater facilities to accommodate projected growth and meet servicing needs. Based on Figure 20 of the plan, the site is well serviced by existing water infrastructure. Existing watermains are located on Shore Acres Drive to the north, 20th Sideroad to the west, and Gilford Road to the south. Based on infrastructure capacity and site configuration, the Subject Lands can likely be serviced by the existing watermain along Gilford Road. Residential uses within the Gilford Settlement Area are typically serviced by private septic systems.

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 Town of Innisfil, the report found the following:

- “Potential, negative servicing gaps were determined for both the water and wastewater serving within the Town of Innisfil at current water and wastewater system design capacities. However, based on information from the Town, and supporting completed Class EA, the Phase 3 expansion of the Alcona Water Treatment Plant will occur in the near future. This upgrade would be able to accommodate for all future (2031) growth with respect to water servicing within the Town’s municipal boundaries.”
- “Additionally, the Class Environmental Assessment to expand/upgrade the Lakeshore Wastewater Treatment Plant such that a total capacity of 40,000 m³/day has been completed. On implementation, the expansion would be more than capable of servicing the Town’s future servicing demands”

While the report does not comment specifically on the town’s capacity for growth beyond the 2031 timeline, the information in the report indicates that as of March 2012, there was a negative servicing gap for both water and wastewater. However, the Town of Innisfil Master Servicing Plan states that the recommended water servicing approach for Gilford is to maintain status quo on water servicing until the Lakeshore Water Distribution System is extended south through Lefroy. Therefore, it is assumed that the municipal water servicing in Gilford would be able to support the inclusion of the Subject Lands in an expansion of the Settlement Area Boundary. No municipal sanitary servicing capital projects were recommended for Gilford as private septic systems are typically used to service wastewater within the settlement area.

To confirm the assumption on municipal infrastructure capacity, servicing reports from the recently approved residential development on 1291 Shore Acres Drive were reviewed. The development is serviced by an existing 200mm municipal watermain on Shore Acres Drive, although the existing watermain along Gilford Road may be appropriate to service the Subject Lands. Wastewater servicing on the approved residential development was provided through private septic systems. No additional municipal servicing issues were identified in the reports.

D5. Potential for Urban Boundary Expansion Along Existing Road Network

The Subject Lands are approximately 11.47 ha in size and located at the southeast corner of Shore Acres Drive and 20th Sideroad. The existing Gilford Settlement Area Boundary comprises the southern and eastern boundary of the Subject Lands. Expanding the Settlement Area Boundary to include the Subject Lands would align the Settlement Area Boundary with the natural borders of Shore Acres Drive and 20th Sideroad. This configuration would allow the Settlement Area Boundary to align with the infrastructure and services laid out in the Town of Innisfil Master Servicing Plan. It would also avoid further mid-block boundaries, as was created when a small portion of the Subject Lands along Gilford Road was previously included within the Gilford Settlement Area.

E. Concluding Remarks

The Subject Lands are well positioned, situated directly west and north of Gilford’s Settlement Area, for inclusion within the Settlement Area Boundary. The lands satisfy the draft criteria for

settlement area boundary expansions created by the Town of Innisfil, are compatible with the existing, adjacent land uses and can be appropriately serviced. In addition, the County's draft Land Needs Assessment indicates that there is a need for DGA land outside of what can be accommodated in the Orbit MZO. Inclusion of the Subject Lands in the Gilford Settlement Area would represent a natural extension and rounding out of the settlement area and intensification of lands along serviced municipal roads, Shore Acres Drive and Gilford Road.

The Subject Lands are in close proximity to existing residential uses and the lands, though designated *Agricultural Areas*, are not suitable for prime agricultural uses. A portion of the north and east of the site are regulated by the LSRCA but as demonstrated by other approved developments within the Gilford Settlement Area, it is possible for development to respect natural features through the use of setbacks and clearly defined development limits.

The Subject Lands, which have the potential to be developed, are being underutilized. Directly south of the Subject Lands' property line are 10 residential lots and 1 commercial lot, which were previously part of the Subject Lands prior to being severed into individual lots. These previous severances indicate that the lands are suitable for development and not necessary for agricultural purposes. An expansion of the Settlement Area Boundary to include these lands would be a logical continuation of the expansion to the boundary previously accommodated to include these 11 lots. In our opinion, the Subject Lands are an ideal candidate for a settlement area boundary expansion.

Weston Consulting and the landowner reserve the right to provide further comments on the MCR process as it relates to settlement area boundary expansions and the Subject Lands. We 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 this request, please contact the undersigned at extension 309.

Yours truly,

Weston Consulting

Per:



Jenna Thibault, BSc, MPL, MCIP, RPP
Associate

Appendix 1: Town of Innisfil - Draft Criteria for Settlement Area Boundary Expansion Consideration

- c. D. Amadio, County of Simcoe, Manager of Planning
- J. Daly, County of Simcoe, County Clerk
- M. Nordstrom, Town of Innisfil, Manager of Land Use Planning
- D. West, Landowner

Appendix 1: Town of Innisfil
Draft Criteria for Settlement Area Boundary Expansion Consideration
Southeast Corner of Shore Acres Drive and 20th Sideroad, Innisfil

Item No.	Criteria	Justification	Application
1	There is a demonstrated need for additional land within a particular municipality given the results of a Land Needs Assessment (LNA) that is being completed at the time of a Municipal Comprehensive Review (MCR).	The County of Simcoe Draft Land Needs Assessment states that 70.2 hectares of new Designated Greenfield Area will need to be developed in Innisfil to accommodate growth and housing needs. This is additional land that is needed for development outside of the amount of growth that can be accommodated in the Orbit MZO. While Gilford is outside of the Primary Settlement Areas within Innisfil, it is well suited to support new designated greenfield development.	Mandatory
2	The expansion does not result in Designated Greenfield Area (DGA) land area capacity that would exceed the 2051 horizon of the Growth Plan.	The total area of the Subject Lands is 11.47 hectares, which is under the land area capacity identified by the County of Simcoe Draft Land Needs Assessment for Innisfil. Expanding the Gilford Settlement Area Boundary to include the Subject Lands would represent 16% of the new Designated Greenfield Area required within the municipality. The inclusion of the Subject Lands would support the proposed intensification target of 35% and housing needs to align with the Draft Land Needs Assessment and Growth Plan.	Mandatory
3	The expansion area will be informed by applicable water and wastewater master plans and stormwater master plans, as appropriate.	The Subject Lands are serviceable by existing infrastructure as defined by Figure 20 in the Innisfil Master Servicing Plan. Existing watermains are located on Shore Acres Drive to the north, 20th Sideroad to the west, and Gilford Road. Residential uses within the Gilford Settlement Area are typically serviced by private septic systems.	Mandatory
4	The expansion area must be located immediately adjacent/contiguous with an existing Primary Settlement Area or Settlement Area as defined in the Growth Plan.	The existing Settlement Area Boundary comprises the south and east boundaries of the Subject Lands. Expanding the Settlement Area Boundary to include the Subject Lands would align the Settlement Area Boundary with the natural borders of Shore Acres Road and 20th Sideroad.	Mandatory
5	The expansion cannot result in land being added to a settlement if that land is situated in another municipality.	The Subject Lands are located entirely within the boundaries of the Town of Innisfil and would not result in an expansion to another municipality.	Mandatory
6	Expansion into a Specialty Crop area and lands subject to the Greenbelt Plan is prohibited.	The Subject Lands are not located within a Specialty Crop area or the Greenbelt Plan.	Mandatory
7	The expansion area will avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the water resource system including the quality and quantity of water.	There is a small watercourse that traverses the north portion of the Subject Lands. Development would not result in any potential negative impacts to this natural heritage feature. An environmental assessment report would be required as a part of any future development application to ensure appropriate setbacks and buffers would be provided to this hydrological feature. Also, through the development application process, suitable stormwater management practices would be established that align with the Town of Innisfil Official Plan.	Mandatory
8	It should be demonstrated how any adverse impacts on the agri-food network including agricultural operations from expanding settlement areas will be avoided and if avoidance is not possible, minimized and mitigated.	While Schedule B of the Town of Innisfil Official Plan identifies the Subject Lands as Agricultural, the site is not currently used for agricultural purposes. It is currently a vacant rural lot. Agricultural operations would not be impacted through the expansion of the settlement area to include the Subject Lands. Further, given that a portion of the site is regulated by the LSRCA, the site is not even suitable for agricultural purposes.	Mandatory
9	The expansion area complies with the minimum distance separation formulae (MDS).	Adjacent agricultural uses do not contain livestock barns, manure storages or anaerobic digesters. Therefore, the Subject Lands do not have to meet the requirements to minimize land use conflict through the minimum distance separation formulae (MDS), as specified by the Ontario Ministry of Agricultural, Food and Rural Affairs.	Mandatory
10	Prime agricultural areas are avoided where possible by considering and evaluating alternative locations. Where prime agricultural areas cannot be avoided, lower priority agricultural lands will be used.	While the Subject Lands are located within a <i>Prime Agricultural Area</i> as identified by the Growth Plan, the County of Simcoe Official Plan Section 3.5.8 provides policies outlining when settlement area boundary expansions in prime agricultural areas are appropriate. A large portion of the land in Innisfil, outside of a Settlement Area Boundary, is designated Agricultural. Further, the Subject Lands are not suitable for agricultural purposes given that a portion of the lands are regulated by the LSRCA. Development on the Subject Lands would not impact surrounding agricultural lands that are actually suitable for agricultural purposes.	Mandatory
11	The expansion area is located where development would support achievement of the Town's density and intensification targets and meets the policy intent of the Town's Official Plan.	The Town of Innisfil Official Plan Chapter 9 outlines density and intensification objectives for development in settlement areas. Section 9.5.1 of the Official Plan states that Hamlets will primarily be comprised of large lot single detached dwellings. Development of the Subject Lands would align with these policies, while incorporating a suitable amount of density and intensification supporting the objectives from the Official Plan and Growth Plan.	Town - Required
12	Significant growth will be directed to Alcona, prioritizing the Major Transit Station Area surrounding the GO Station and areas subject to the Alcona South and Alcona North Secondary Plans.	The Town of Innisfil Official Plan Section 9.2 outlines requirements for strategic growth within Primary Settlement Areas, including Alcona. The Draft Land Needs Assessment states that there is 70.2 hectares of new Designated Greenfield Area that will need to be developed in Innisfil in addition to the growth that can be accommodated by the Orbit MZO in Alcona to meet housing needs and population growth. There are opportunities to accommodate growth within other settlement areas within Innisfil.	Town - Required
13	The expansion area has appropriately considered matters related to sustainability and climate change.	The ecological integrity of the Gilford Settlement Area would be kept by ensuring that the natural ecological processes are intact and self-sustaining. Also, the protection of Key Natural Heritage Features and Key Hydrologic Features on the Subject Lands would be maintained through appropriate zoning of these feature and buffers.	Town - Required

Appendix 1: Town of Innisfil
Draft Criteria for Settlement Area Boundary Expansion Consideration
Southeast Corner of Shore Acres Drive and 20th Sideroad, Innisfil

Item No.	Criteria	Justification	Application
14	The expansion area would be located to maximize the use of existing infrastructure and public service facilities. The infrastructure and public service facilities needed would be financially viable over the full life cycle of these assets.	Expansion of the Gilford Settlement Area Boundary to include the Subject Lands would maximize the use of existing infrastructure as specified in the Town of Innisfil Master Servicing Plan and Parks and Recreation Master Plan. This would include considerations for site servicing, as well as public service facilities, to ensure that development can be supported and will contribute to the objective of building complete communities. Existing watermains are located on Shore Acres Drive to the north, 20th Sideroad to the west, and Gilford Road to the south. Based on infrastructure capacity and site configuration, the Subject Lands can likely be serviced by the existing watermain along Gilford Road. Residential uses within the Gilford Settlement Area are typically serviced by private septic systems.	Town - Required
15	The expansion area is located where it can support a range and balance of housing (including affordable housing) and employment options.	Development on the Subject Lands would be able to support the need for a range and balance of housing options as outlined by Section 14.3 of the Town of Innisfil Official Plan. While residential growth within Hamlets is limited to large lot single detached dwellings (Section 9.5.1), there is an adequate provision of housing to meet needs and intensification targets as outlined in the County of Simcoe Draft Land Needs Assessment.	Town - Required
16	The expansion area will contribute to achieving compact, walkable, sustainable and healthy communities that enhance a sense of place.	Sections 14 of the Town of Innisfil Official Plan provides policies on community sustainability, including well-being, accessibility and healthy communities. The location of the Subject Lands in relation to adjacent residential uses would allow the expansion area to achieve a compact and walkable form, which would enhance the livability of the settlement area. The protection of natural heritage features on the Subject Lands would also contribute to enhanced livability within the Gilford Settlement Area.	Town - Required
17	The expansion area adequately protects and avoids development within key natural heritage features and hydrologic features.	Development on the Subject Lands would respect setbacks to Key Natural Heritage Features and Key Hydrologic Features to minimize potential environmental impacts from future development. Through the development approval process, studies would be undertaken to evaluate the significance of natural heritage and hydrologic features on the Subject Lands and ensure that proper setbacks and buffers were applied.	Town - Required
18	The expansion area provides an appropriate rural interface.	Inclusion of the Subject Lands within the Settlement Area Boundary would represent a natural extension of the existing Gilford Settlement Area Boundary and would not pose any adverse impact on the surrounding rural/agricultural lands to the north and west. Development of the Subject Lands for residential uses would be compatible with the lands to the east and south, within the Settlement Area Boundary.	Town - Required