

Ministry of Municipal Affairs and Housing
777 Bay Street, 16th Floor
Toronto, ON, M7A 2J3

February 3, 2023
4438-2

Attn: Julianna Zhuo, Ministry of Municipal Affairs and Housing

**RE: Settlement Area Boundary Expansion – Municipal Comprehensive Review
275 Elizabeth Street
Township of Adjala-Tosorontio**

Weston Consulting has been retained by the owner of the lands municipally known as 275 Elizabeth Street in the Township of Adjala-Tosorontio (herein referred to as the “subject lands”) in order to comment on the County of Simcoe’s Settlement Area Boundary Expansion as part of the County’s Municipal Comprehensive Review (“MCR”). The purpose of this letter is to provide a formal submission as part of the County of Simcoe’s MCR, notably Official Plan Amendment Number 7 (“OPA No. 7”), on behalf of our client in support a request in consideration of the inclusion of the subject lands within the Alliston Primary Settlement Area within the Town of New Tecumseth.

A. County of Simcoe Municipal Comprehensive Review

The County of Simcoe is in the process of updating their Official Plan as part of the MCR to better align the policies of the Plan with the current Provincial policy regime, and to properly guide population and employment growth within the County to 2051. The County of Simcoe enacted By-law No.6977 to adopt OPA No. 7 on August 9, 2022. The effect of this amendment is to allocate population and employment growth to each of the sixteen local municipalities, and to determine density and intensification targets, as well as future community area and employment area land needs.

OPA No. 7 (Phase 1 Growth Management) includes the following components:

- Provides a hierarchy on the four types of settlement areas in the County, and classification of the 93 settlement areas, based on the four types of settlement areas;
- Incorporates population and employment forecasts;
- Increases the County-wide minimum intensification target from 32% to 35% to further focus growth in delineated built-up areas;
- Increase the County-wide minimum designated greenfield area density target from 39 residents and jobs per hectare to 51 residents and jobs per hectare;
- Requires growth phasing plans that support growth and identify logical boundaries that build on key community infrastructure;
- Identify how much additional designated greenfield area land is required for community uses and employment lands
- Provide clarity on where public service facilities are permitted

OPA No. 7 identifies Adjala-Tosorontio as having Category 3 and Category 4 Settlement Areas in Table A. This category is intended for settlement areas that do not have a delineated built boundary, but which have existing or planned municipal and wastewater systems. The subject lands are situated directly adjacent to the community of Alliston, located in the Township of New Tecumseth, which is classified as a Primary Settlement area, as per OPA No. 7.

Table B of OPA No. 7 outlines the population forecasts for local municipalities in the County. Adjala-Tosorontio forecasted population increase between 2021 and 2051 is 710 residents. New Tecumseth's forecasted population increase between 2021 and 2051 is 35,110 residents.

Table C of OPA No. 7 outlines the employment forecasts for local municipalities in the County. Adjala-Tosorontio employment forecast between 2021 and 2051 is 360. New Tecumseth's employment forecast between 2021 and 2051 is 10,870.

Table D of OPA No. 7 outlines intensification targets for local municipalities in the County. Adjala-Tosorontio intensification target is not included in Table D. New Tecumseth's intensification target is 37%, whereas Simcoe County's average intensification target is 35%.

Table E of OPA No. 7 outlines designated greenfield area density targets for each local municipality. Adjala-Tosorontio's greenfield area density target is not included in Table E. New Tecumseth's designated greenfield area density target is 55 residents and jobs combined per hectare, whereas Simcoe County's anticipates an average of 51 residents and jobs combined per hectare.

As per Table F, OPA No. 7 stipulates that New Tecumseth is anticipated to accommodate 448.4 hectares for community uses, and 75.2 hectares for employment lands. Part of this growth will be directed towards Alliston, being a Primary Settlement Area in the Town of New Tecumseth.

OPA No. 7 has been adopted by the County, and is under review by the Province of Ontario.

OPA No. 7 outlines policies providing criteria for local municipalities to assess and recommend certain lands for inclusion in the settlement area boundaries, including:

3.2.28 For those municipalities that are required to plan for additional designated greenfield area through settlement area expansion in accordance with this section, a comprehensive planning process shall be undertaken to identify the most appropriate location(s) for additional growth and development that best:

- i) Protects natural heritage features and areas;*
- ii) Promotes coordinated, efficient and cost-effective infrastructure;*
- iii) Promotes fiscal responsibility; and*
- iv) Ensures the development of compact, complete and healthy communities*

3.2.9 In addition to the above, the local municipality will be required to demonstrate in support of the recommended location(s) for additional urban development that:

- i. There is sufficient capacity in existing or planned infrastructure and public service facilities;*
- ii. The infrastructure and public service facilities needed would be financially viable over the full life cycle of these assets;*
- iii. The proposed expansion would be informed by applicable water and wastewater master plans or equivalent and stormwater master plans or equivalent, as appropriate;*
- iv. The proposed expansion, including the associated water, wastewater and stormwater servicing, would be planned and demonstrated to 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;*
- v. Key hydrologic areas and the Natural Heritage System for the Growth Plan have been avoided where possible;*

- vi. *Prime agricultural areas have been avoided where possible;*
- vii. *The settlement area to be expanded is in compliance with the minimum distance separation formulae;*
- viii. *Any adverse impacts on the agri-food network, including agricultural operations, from expanding settlement areas would be avoided, or if avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment; and*
- ix. *The policies of Sections 2 (Wise Use and Management of Resources) and 3 (Protecting Public Health and Safety) of the Provincial Policy Statement are applied.*

The purpose of this letter is to outline consideration that would support a settlement area boundary expansion from the east to include the subject lands. This would assist in accommodating the forecasted population growth in the County and meet the land use needs for the Township of Adjala-Tosorontio and the Township of New Tecumseth over the planning horizon. It is our opinion and the view of our client that the subject lands should be included in any future expansion of the Alliston Primary Settlement Area in order to assist in the creation of residential and employment uses to accommodate the County’s anticipated growth.

B. Description of the Subject Lands and Site Context

The subject lands are located adjacent to the Alliston Primary Settlement Area, being situated within the Town of New Tecumseth. The subject lands are situated within the Township of Adjala-Tosorontio. The subject lands are approximately 23.81 hectares in area, and are currently vacant agricultural lands (Figure 1).



Figure 1: Air Photo of the Subject Lands

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

- **North:** The lands to the north consists of single detached family dwellings, as commercial uses. Further north includes agricultural lands, and Earl Rowe Provincial Park.
- **South:** The lands to the south consists of agricultural lands, and greenfield lands being converted into housing.
- **East:** East of the lands is the Town of New Tecumseth, notably the community of Alliston. The lands directly west are defined predominantly by single detached dwellings, and community uses.
- **West:** West of the lands are commercial uses and agricultural lands.

C. Settlement Area Expansion

Our request is to include the subject lands within or adjacent to the Alliston Settlement Area, which is a Primary Settlement Area, in order to allow for Community Area and/or Employment Area land uses to be developed. The subject lands provide a total area of 23.8 hectares and are currently adjacent to an existing settlement boundary, as seen in Figure 2.

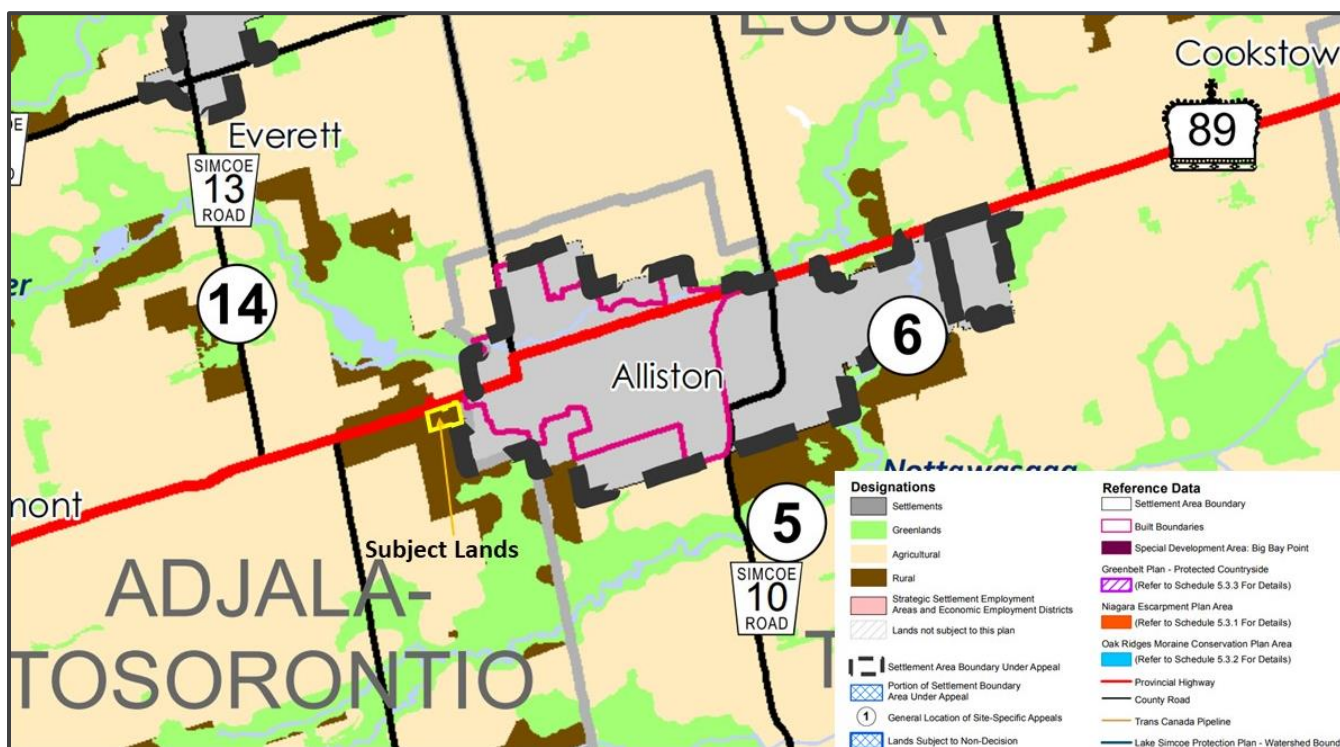


Figure 2: County of Simcoe Schedule 5.1 – Land Use Designations

The following provides a preliminary rationale for the proposed settlement expansion based on consideration of the criteria of both OPA No. 7 and Growth Plan policy 2.2.8.3. The Growth Plan provides the following policies related to settlement area boundary expansions:

3. Where the need for a settlement boundary expansion has been justified in accordance with policy 2.2.8.2, the feasibility of the proposed expansion will be determined and the most appropriate location for the proposed expansion will be identified based on the comprehensive application of all of the policies in the Plan, including the following:

- a) *there is sufficient capacity in existing or planned infrastructure and public service facilities;*
- b) *the infrastructure and public service facilities needed would be financially viable over the full life cycle of these assets;*
- c) *the proposed expansion would be informed by applicable water and wastewater master plans or equivalent and stormwater master plans or equivalent, as appropriate;*
- d) *the proposed expansion, including the associated water, wastewater and stormwater servicing, would be planned and demonstrated to 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;*
- e) *key hydrologic areas and the Natural Heritage System for the Growth Plan should be avoided where possible;*
- f) *prime agricultural areas should be avoided where possible. To support the Agricultural System, alternative locations across the upper- or single-tier municipality will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the Agricultural System and in accordance with the following:*
 - i. *expansion into specialty crop areas is prohibited;*
 - ii. *reasonable alternatives that avoid prime agricultural areas are evaluated; and*
 - iii. *where prime agricultural areas cannot be avoided, lower priority agricultural lands are used;*
- g) *the settlement area to be expanded is in compliance with the minimum distance separation formulae;*
- h) *any adverse impacts on the agri-food network, including agricultural operations, from expanding settlement areas would be avoided, or if avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment;*
- i) *the policies of Sections 2 (Wise Use and Management of Resources) and 3 (Protecting Public Health and Safety) of the PPS are applied;*
- j) *the proposed expansion would meet any applicable requirements of the Greenbelt, Oak Ridges Moraine Conservation, Niagara Escarpment, and Lake Simcoe Protection Plans and any applicable source protection plan; and*
- k) *within the Protected Countryside in the Greenbelt Area:*
 - i. *the settlement area to be expanded is identified in the Greenbelt Plan as a Town/Village;*
 - ii. *the proposed expansion would be modest in size, representing no more than a 5 per cent increase in the geographic size of the settlement area based on the settlement area boundary delineated in the applicable official plan as of July 1, 2017, up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area;*
 - iii. *the proposed expansion would support the achievement of complete communities or the local agricultural economy; iv. the proposed uses cannot be reasonably accommodated within the existing settlement area boundary; v. the proposed expansion would be serviced by existing municipal water and wastewater systems without impacting future intensification opportunities in the existing settlement area; and vi. expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited.*

The criteria identified in OPA No. 7 and in the Growth Plan 2020 have been categorized below with a response to each demonstrating that the proposed settlement area boundary expansion to include the subject lands meets applicable criteria.

Continuous Built Environment

Figure 3 shows that to the east of the subject lands includes the Alliston Settlement Area which is comprised of single detached dwellings, various community uses, and industrial uses. Additionally, Figure 3 depicts the

settlement area to the north of the subject lands. In our opinion, it would be appropriate to include the subject lands along with the adjacent parcel in the settlement area expansion to allow for a continuous and logical transition and continuation of Alliston.

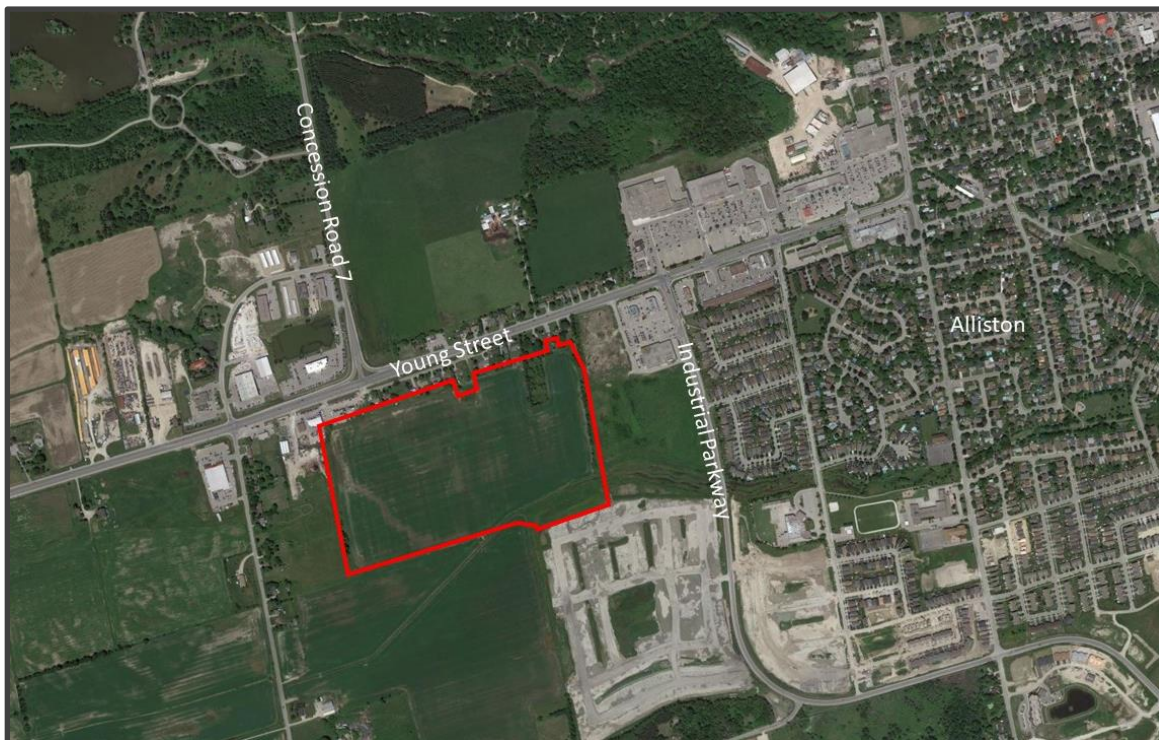


Figure 3: Air Photo of Surrounding Area

Land Needs Assessment

Based on the Land Needs Assessment prepared by Hemson Consulting, the Township of Adjala-Tosorontio is expected to grow by 710 people from 2021 to 2051. The Town of New Tecumseth is expected to grow by 35,110 people, much of which will be accommodated into the Alliston Settlement area.

As the eastern boundary of the subject lands are situated along the western boundary of the Town of New Tecumseth, the incorporation of the subject lands into or adjacent to the Primary Settlement area boundary of Alliston will help to further accommodate growth, and help to fulfill the County’s population and community area targets, in a logical manner.

Provincial and Regional Plans

The subject lands are not situated within the Greenbelt Plan or Oak Ridges Moraine Plan area. As a result, an expansion of the Alliston Primary Settlement Area is not expected to impact any provincial natural heritage systems. In addition, the lands are identified as rural, and not agricultural.

Compact, Complete and Healthy Communities

Incorporating the subject lands into or adjacent to the Alliston Primary Settlement Area, and subsequent development of vacant lands will support the creation of compact, complete and healthy communities as nearby amenities, services, community resources and existing infrastructure will be contemplated.

Community Services

To the east of the subject lands includes the Alliston Primary Settlement Area, which includes various commercial uses. These uses include retail stores, restaurants, grocery stores, a shopping mall, an arena, religious institutions, as well as secondary and elementary schools. Any expansion of the settlement area boundary to include the subject lands and subsequent proposed developments will be supported by community services and facilities.

D. Conclusion

The subject lands would be serviceable, given the proximity to nearby existing infrastructure, and they are situated adjacent to an existing Primary Settlement Area.

Given the proximity of the lands to the Allison Primary Settlement area, the subject lands are representative of an appropriate expansion to the Allison Primary Settlement Area, or could be established as a settlement adjacent to and integrated with Alliston. Should the County and/or Province deem it necessary to expand the Alliston Primary Settlement Area to accommodate future population and employment growth, it is our position that the subject lands would be suitable for the expansion.

Weston Consulting and our client 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 with respect to this matter. Thank you for reviewing this request. If you have any questions regarding the above comments, please contact the undersigned.

Yours truly,

Weston Consulting

Per:



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