



CAPREIT

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February 2, 2023

SUBMITTED TO ENVIRONMENTAL REGISTRY OF ONTARIO

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

**RE: Approval of County of Simcoe's Official Plan (ERO number 019-6113) –
Consideration of Silver Creek Estates to be in the Settlements Area of
Township of Severn, Simcoe County**

Dear Ms Julianna,

We are writing to submit this request on behalf of CAPREIT Apartments Inc., the owner of the lands within Silver Creek Estates, located in the Township of Severn (herein referred to as the "subject property"). The purpose of the correspondence is to provide formal comment as part of the Ministry of Municipal Affairs and Housing's consultation process regarding County of Simcoe's Official Plan No.7 for incorporating the subject property into the Settlements area. This letter details the application history of the subject property, relevant policies, legislation, and regulations under the planning hierarchy.

Description of Subject Lands Location and Context Area Summary

The subject property is located to the east of Carylton Line, south of Trans Canada Trail, in the existing Silver Creek Estates mobile home community. The subject property is legally described as:

PT LT 1 CON 6 SOUTH ORILLIA PT 1,2,3 & 4 51R 29100, S/T RO94922 & RO95583
AMENDED BY RO131518; S/T NSO19368, RO990590, S/T EASEMENT OVER PTS 1,2,3 &
4 PL 51R29100 AS IN SC279015; SEVERN

The subject property has an approximate combined area of 32.9 hectares. The vehicular access to the subject property is provided via J.V. Parkway, and Hilltop Road which are the private roads connected to Carlyon Line as a local municipal road. The subject property consists of existing manufactured home community, and vacant area (see figure 1). The

existing Silver Creek Estates community is located in the middle of the lot and consists of 242 mobile homes, an administration office, maintenance garage, sales office, and restaurant. All existing internal roads within the existing community are privately owned and maintained. A private communal well system and a communal wastewater treatment system serve the existing community. The community was established in 1975 under previous ownership. CAPREIT Apartments Inc. acquired the subject property in 2012. The subject property is located in Ward 3, within the Township of Severn in the County of Simcoe.



Figure 1: Subject Property Aerial Image

Surrounding Uses

The land uses surrounding the subject lands are as follows:

North: Directly to the north of subject lands is a woodlot. Further to the north is a length of the decommissioned Canadian Pacific Railway, beyond which is the Trans-Canada Trail (Also locally known as Uthhoff Trail).

East: Directly east of the subject lands is the length of the decommissioned Canadian Pacific Railway. Further east there are existing naturalized undeveloped lands, zoned for Environmental Protection.

South: Directly to the south of the subject lands is wooded areas, zoned as Rural, containing single-detached residential dwellings accessible from Ryerson Boulevard are also to the south.

West: To the west of the site is Carlyon Line, which is a Local municipal road. Further west, across Carlyon Line, the lands are primarily naturalized and are zoned as Rural and Environmental Protection.

The subject lands contemplate the expansion of the manufactured home community. The subject lands provide an ideal location for the manufactured home, due to its proximity to the

Orillia downtown, the community infrastructure, and open space.

Planning Policy Analysis

Provincial Policy Statement, 2020

The proposed Manufactured Home development does not result in negative direct, indirect or cumulative impacts on the significant woodlands or associated significant wildlife habitat functions (Seepes and Springs; Woodland Area-sensitive Bird Breeding Habitat; Deer Movement Corridor, potential Bat Maternity Colony habitat/habitat of Endangered bats), fish habitat (tributaries of Silver Creek), or individuals or habitat of Endangered or Threatened species consistent with Sections 2.1.5 b) significant woodlands; 2.1.5 d) significant wildlife habitat; 2.1.7 habitat of Endangered and Threatened species; and 2.1.8 development adjacent to significant natural heritage features and functions. By extension, no authorizations issues under the *Fisheries Act or Ontario's Endangered Species Act, 2007* are required. It is also our opinion that the expansion of the existing manufactured home represents a good planning and maintaining the residential character of the subject property is in keeping with the PPS with respect to utilizing the existing lands efficiently and encouraging infill development.

A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020 Consolidation)

The proposed Manufactured Home development does not impact key natural heritage features that are part of the NHS (as amended) or key hydrologic features (permanent streams, intermittent streams, inland lakes and their littoral zones, seepage areas and springs and wetlands) consistent with Section 4.2.3 of Growth Plan. The Growth Plan recognizes the need for more efficient utilization of lands, compact form and supports the principle of higher densities in appropriate areas. The subject property is proposed to be used for manufactured residential units which are more attainable in nature and promotes redevelopment of a vacant land and respects all applicable natural buffers on the site to protect the natural features.

County of Simcoe Official Plan (2008)

The County is undertaking a Municipal Comprehensive Review (MCR). The MCR is a specific planning process used to bring an Official Plan (OP) into conformity with the Growth Plan. It establishes the overall pattern of development and environmental management in the County. The County of Simcoe Official Plan designates the subject lands as *Greenlands* (see Figure 3, Excerpt from the Schedule 5.1, land use - County of Simcoe Official Plan) and as the County's Natural heritage system (County NHS) as per the Growth Plan.



Figure 2: County Official Plan- Land Use Map

Township of Severn has submitted a letter to the County of Simcoe to remove the lands from Greenland designation to allow for urban expansion to include the subject property in the Settlements Area.

Township of Severn Official Plan (TSOP), 2010

The TSOP identifies the subject lands within the South of Division Road Secondary Plan. The continuation of mobile home development is allowed under the Secondary Plan. TSOP also designated the subject property predominantly as Mobile Home Residential. The Mobile Home Residential land use designation encompasses the existing Silver Creek Estates mobile home park. This designation permits the Mobile Home residential use. We would also like to note that, the Township of Severn has submitted a request to the County to include the entire Secondary Plan Area in the Settlements Area.

Conclusion

With the reasons stated above, in our opinion, the request for inclusion of the subject property included in the Settlements Area of the Region to accommodate manufactured homes is appropriate and represents an efficient use of the underutilized lands. The inclusion of the subject lands would also significantly support affordable housing as these units are generally more affordable than standard dwelling units. We are grateful for the continued direction by the Province to improve housing supply. To that end, we respectfully request that you include our lands in the Settlements Area of the Region.

Thank you for the opportunity to provide this letter, we would be open to future discussions regarding this matter. Should you have any questions or require any additional information, please contact the undersigned s.lo@capreit.net

Yours truly,

Shawni Lo,
Director of Development
On behalf of CAPREIT Apartments Inc.