

February 2nd, 2023

Hon. Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street – 17th Floor
Toronto, ON M7A 2J3

RE: ERO #019-6113
8156 Yonge Street, Stroud, Innisfil, County of Simcoe
Lands located at the south-west corner of Yonge Street and Lockhart Road
Comments on County of Simcoe OPA 7 (MCR Phase 1 Growth Management)
Consideration for Addition of Lands to Settlement Area Boundary

The Biglieri Group Ltd. (“TBG”) represents the owner of the lands municipally known as 8156 Yonge Street in the Town of Innisfil (“Subject Site”). This letter has been prepared to provide commentary on County of Simcoe OPA 7 (MCR Phase 1 Growth Management) as well as to support a formal request for the Subject Site to be considered for inclusion in the resultant Settlement Area Boundary Expansion in the County of Simcoe and Town of Innisfil. Ultimately, the intent is for the property to be redesignated from *Agricultural* to *Settlements* in the County Official Plan.

The letter is organized in the following Sections:

- A. Subject Site and Surrounding Land Uses
- B. Policy Framework (PPS, Growth Plan, Simcoe OP, Innisfil OP and Innisfil ZBL)
- C. Comments On Simcoe OPA 7
- D. Criteria for Settlement Area Boundary Expansion Consideration
- E. Appendices

SECTION A – SUBJECT SITE & SURROUNDING LAND USES

The Subject Site is located at the southwest corner of Yonge Street and Lockhart Road, municipally recognized as 8156 Yonge Street (**Figure 1**). The site is approximately 30.97 hectare (76.52 acres) in size and has a frontage of approximately 524.85 metres along Yonge Street and approximately 593.56 metres along Lockhart Road.

The surrounding land uses (**Figure 2**) include:

North: City of Barrie city boundary (Neighbourhood and Medium density designations), Barrie South Go Station, and beyond Kempenfelt Bay.

South: Stroud settlement boundary (Village Neighbourhood and Downtown Commercial Area designations which includes grocery stores, pharmacies, retail stores and restaurants), and beyond agricultural lands.

East: Agricultural lands.

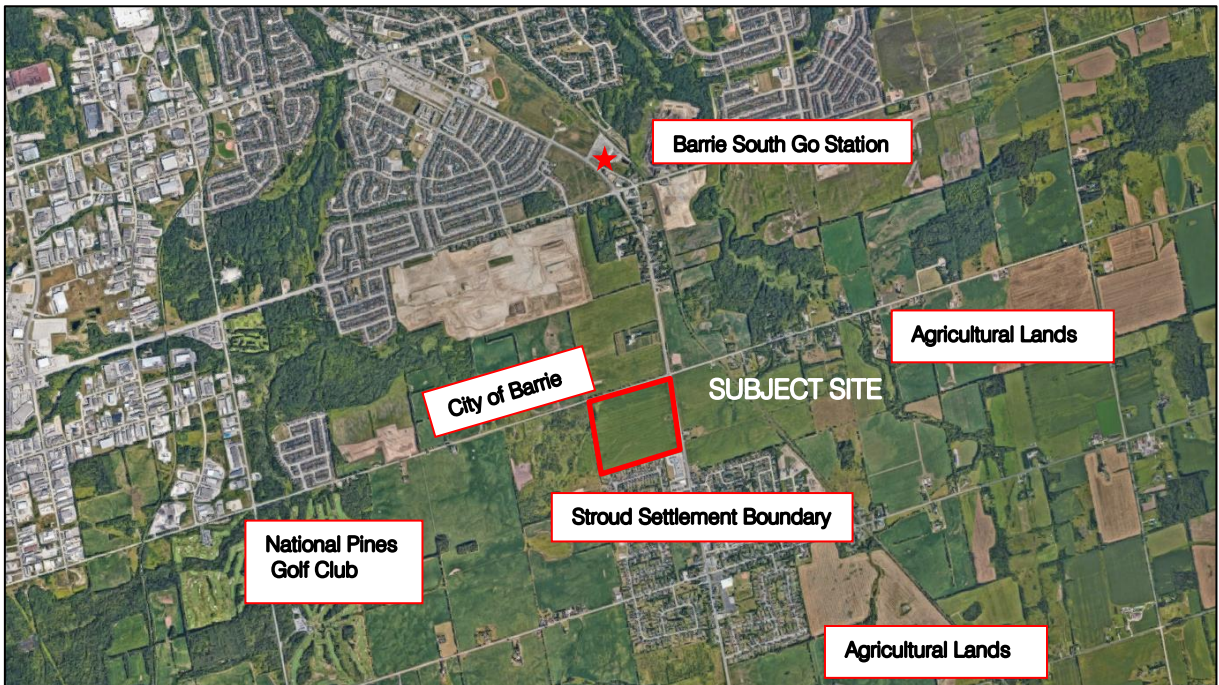
West: Agricultural lands and National Pines Golf Club.

Figure 1. Subject Site



(Source: Google, 2021)

Figure 2 – Site Context



(Source: Google, 2021)

SECTION B – POLICY BACKGROUND

Provincial Policy Statement (2020)

The Provincial Policy Statement (“PPS”) provides overall direction on matters of provincial interest related to municipal planning decisions. Decisions made under the Planning Act, shall be consistent with the PPS.

The PPS supports sustaining healthy, liveable and safe communities by promoting efficient development and land use patterns, accommodating a range and mix of affordable and market-based residential units, avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas that are adjacent or close to settlement areas, by promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to optimize transit investment and minimize land consumption and servicing costs, and by ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs (Policy 1.1.1a, b, d, e, g).

The PPS also directs that sufficient lands shall be made available to accommodate an appropriate range and mix of lands uses to meet projected needs for a time horizon of up to 25 years. An alternative timeframe may be used for specific areas of the Province subject to a provincial plan or planning exercise (Policy 1.1.2).

Policy 1.1.3.8 of the PPS states that a planning authority may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a comprehensive review (“MCR”) and only where a series of criteria have been demonstrated.

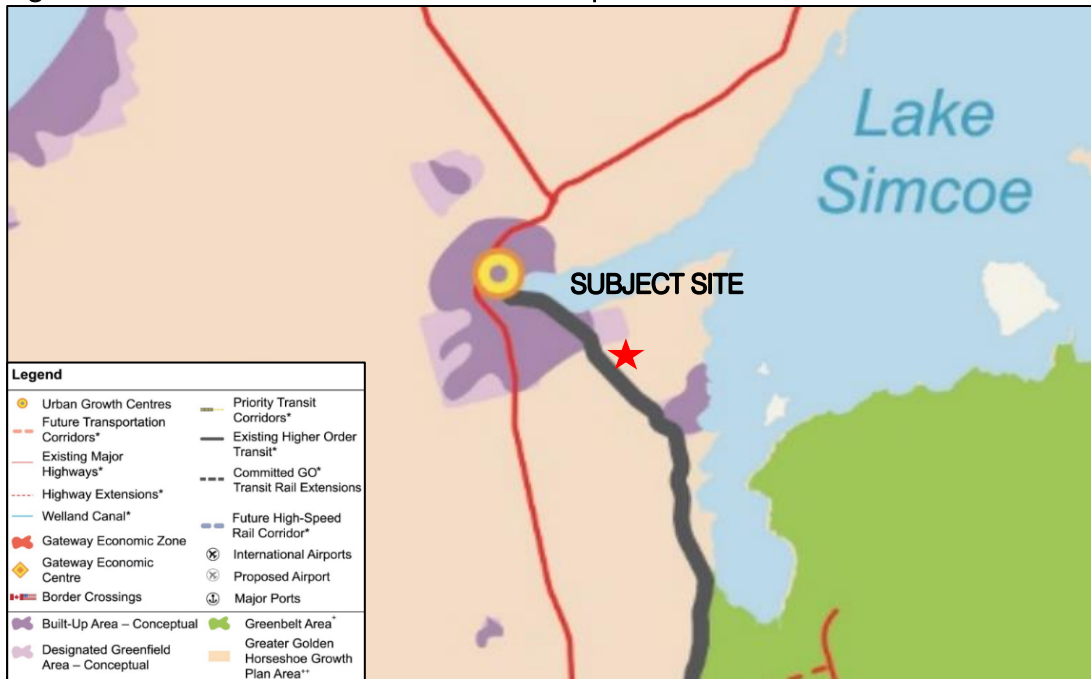
It is noted that County of Simcoe is currently undergoing a MCR where-in it will identify lands for settlement area expansion.

Growth Plan (2020)

The Subject Site is subject to the A Place to Grow: Growth Plan for the Greater Golden Horseshoe (“Growth Plan”) (**Figure 3**). Policy 2.2.8.2 states that a settlement area boundary expansion may only occur through a municipal comprehensive review (“MCR”), and where a series of provided criteria have been demonstrated. Policy 2.2.8.3 provides additional criteria for determining the feasibility and most appropriate location for proposed expansions.

It is noted that the County of Simcoe is currently undergoing a MCR where-in it will identify lands for settlement area expansion and will consider comprehensively the policies in Section 2.2.8.2-3.

Figure 3. Schedule 2 – A Place to Grow Concept



(Source: MMAH, 2020)

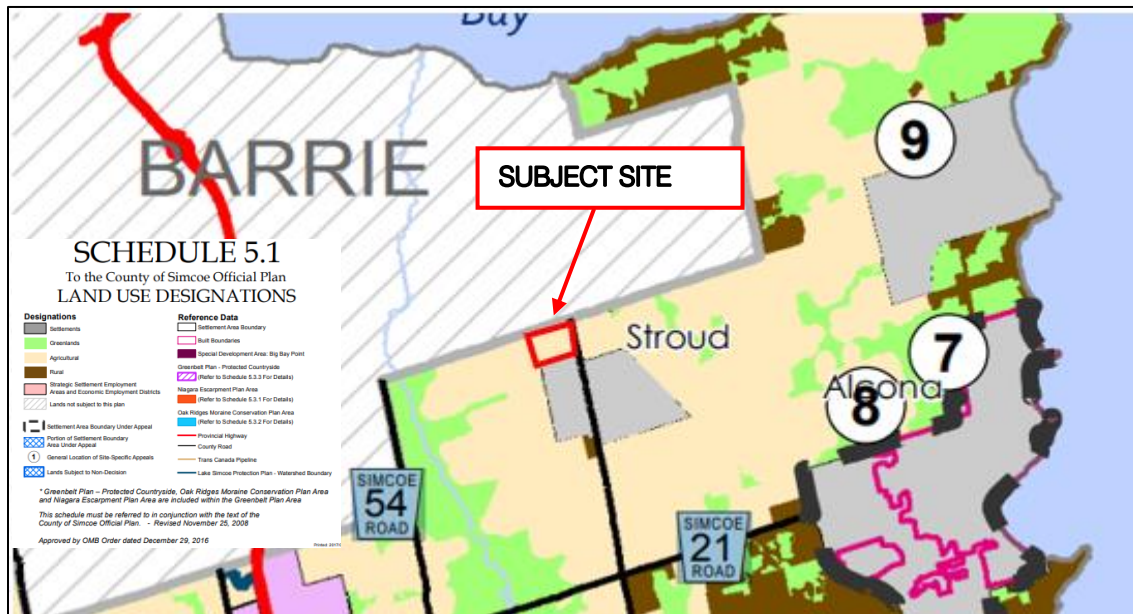
Current County of Simcoe Official Plan (December 29, 2016)

The Subject Site is designated *Agricultural* in the County of Simcoe Official Plan, per Schedule 5.1 - Land Use Designations (Figure 4). Per policy 3.6.5, the lands are identified as a *prime agricultural area*. All types, sizes and intensities of agricultural uses and normal farm practices shall be promoted and protected in accordance with provincial standards.

Policy 3.6.11 states that proposals to re-designate lands from the *Agricultural* designation may only be considered for expansions to settlement areas in accordance with applicable policies of this Plan, Provincial policy statements issued under the Planning Act and Provincial plans.

Inclusion of the Site in the Settlement Area Boundary would result in re-designating the site to *Settlements* in the County Official Plan; which Policy 3.6.11 suggests is permissible. Consistent with the PPS and Growth Plan, Policy 3.5.17 further states that Settlement Area Boundary Expansions may occur only in accordance with an approved municipal comprehensive review that is consistent with a growth management study (currently underway through the County of Simcoe MCR process) and where a series of considerations included in the policy have been demonstrated. Similarly, policy 3.5.18 outlines a further set of criteria for the decision on direction or location of Settlement Area Expansions where they are needed to meet projected development needs.

Figure 4. Subject Site in County of Simcoe Official Plan: Schedule 5.1 Land Use Designations



(Source: County of Simcoe Official Plan, Schedule 5.1, 2016)

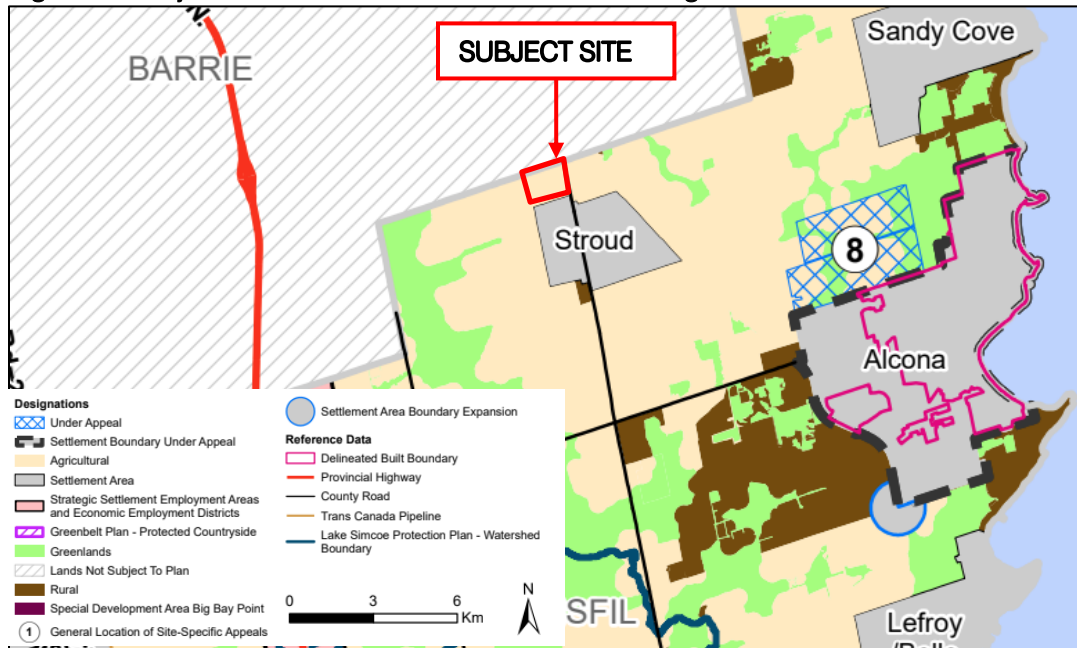
Adopted County of Simcoe Official Plan (August 9, 2022)

County of Simcoe is currently undergoing a Municipal Comprehensive Review (MCR), to bring the County Official Plan into conformity with the Growth Plan. On August 9, 2022, OPA No. 7 (Municipal Comprehensive Review Phase 1 Growth Management) was adopted by County of Simcoe Council.

The Subject Site is designated *Agricultural* in the Adopted County of Simcoe Official Plan, per Schedule 5.1 - Land Use Designations Alcona Settlement Area Boundary Expansion (Figure 5). The Subject Site does not consist of Specialty Crop lands.

County of Simcoe is taking a phased approach to the MCR process, with each phase addressing a component of the MCR which ultimately becomes an amendment to the County of Simcoe Official Plan. Phase One of the County’s MCR process is to allocate population and employment growth and to determine the amount of land needed to accommodate this growth. Accordingly, the Adopted County of Simcoe Official Plan does not contain precise locations for Settlement Area Expansion (outside of the Alcona area).

Figure 5. Subject Site in Schedule 5.1: Land Use Designations Alcona SABE



(Source: Adopted County of Simcoe Official Plan Schedule 5.1: Land Use Designations, 2022)

In the Supplemental Memorandum from a Council Workshop released by the County on December 21, 2021 regarding MCR updates, it is stated that “for any municipalities that may need to expand a settlement, the decision on where that expansion is most appropriate will be based on an evaluation process, which will be conducted collaboratively by the local municipalities and the County. Further, it is important to note that prior to any settlement area expansion being considered by the County, the local municipalities will need to demonstrate that there is sufficient capacity in existing or planned infrastructure and public service facilities. In addition, local municipalities will need to review and consider the impacts of settlement area expansions on natural heritage, the Natural Heritage System for the Growth Plan and prime agricultural areas in the consideration of expansion options.”

Another component of OPA 7 is to develop a hierarchy of settlement areas, which for County of Simcoe constitutes 4 categories with accompanying criteria. The Subject Site is located north of Stroud, a Category 3 Settlement Area per the Adopted County of Simcoe Official Plan. Category 3 Settlement Areas are defined as “settlement areas that do not have a delineated built boundary but which have existing or planned municipal water and wastewater systems” per policy 3.1.1. The focus of growth in the County is directed towards Category 1 and Category 2 Settlement Areas in conformity with Growth Plan policy 2.2.1.2. Category 3 Settlement Areas account for the remainder of growth in the County, per Table A of Policy 3.2.2 c) (Table 1).

Table 1. Settlement Areas – Category 3

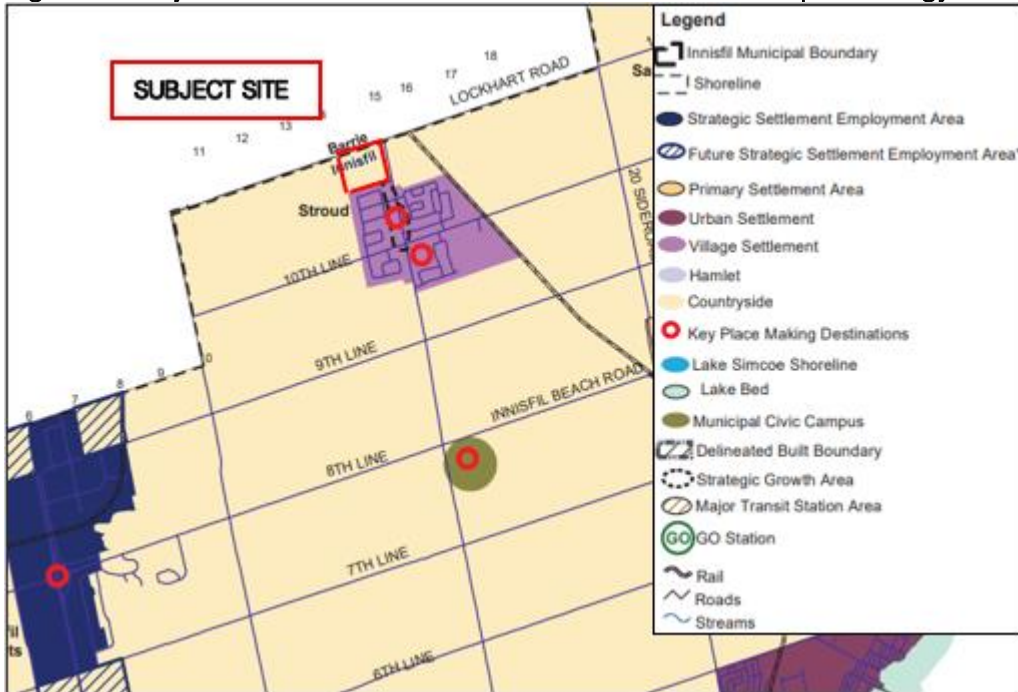
Category 3 - Settlement Areas that do not have a delineated built boundary but which have existing or planned municipal water and wastewater systems	
Atherley-Uptergrove	Ramara
Baxter	Essa
Bond Head	Bradford West Gwillimbury
Brechin	Ramara
Centre Vespra	Springwater
Colgan	Adjala-Tosorontio
Craighurst	Oro-Medonte
Everett	Adjala-Tosorontio
Hillsdale	Springwater
Horseshoe Valley	Oro-Medonte
Lagoon City	Ramara
Lefroy/ Belle-Ewart	Innisfil
New Lowell	Clearview
Nottawa	Clearview
Sandy Cove	Innisfil
Snow Valley	Springwater
Stroud	Innisfil
Thornton	Essa
Washago	Severn portion

(Source: Simcoe Official Plan Amendment – Growth Management, 2022)

Town of Innisfil Official Plan (Consolidated, August 2020)

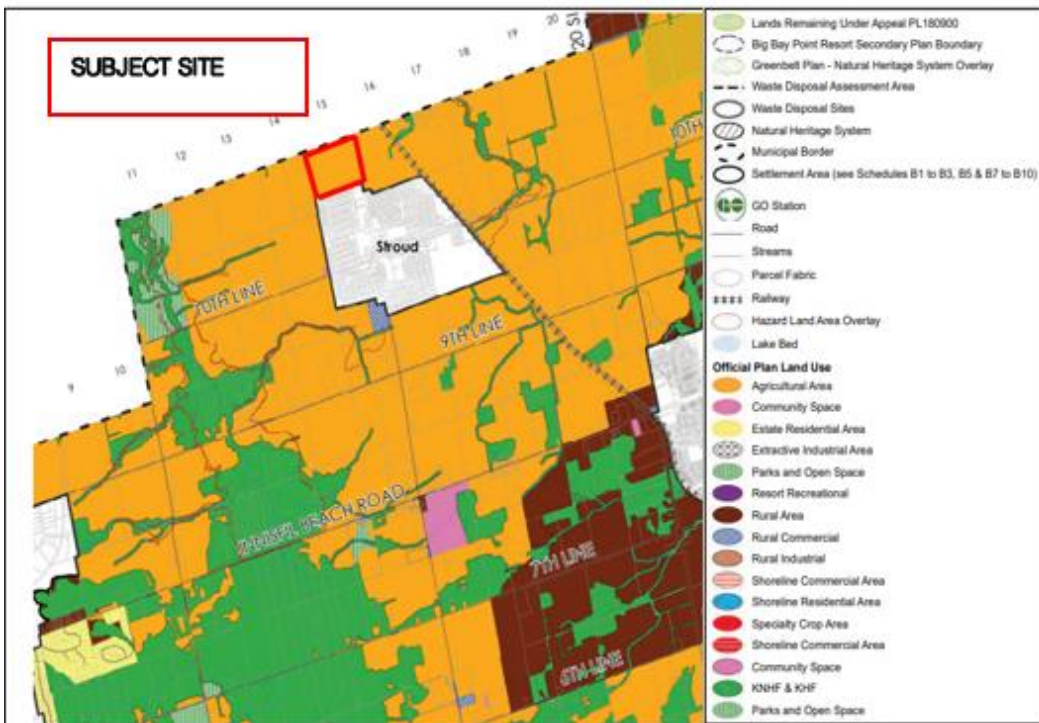
The Subject Site is designated *Countryside* in the Innisfil Official Plan, per Schedule A (Figure 6). It is designated *Agricultural Area* per Schedule B – Land Use (Figure 7), and designated *Agricultural Area* per Schedule BB, in the Provincial Agricultural Land Base Map (Appendix 2). With respect to the timing and considerations for Settlement Area Boundary expansion, the Policies of the Innisfil Official Plan conform to the policies of the PPS, Growth Plan and County Official Plan. They generally permit for consideration of expansion to the Settlement Area Boundary at the time of the Simcoe MCR.

Figure 6. Subject Site in Innisfil Official Plan Schedule A: Municipal Strategy



(Source: Town of Innisfil Official Plan, 2018)

Figure 7. Subject Site in Innisfil Official Plan Schedule B: Land Use



(Source: Town of Innisfil Official Plan, 2018)

Section 9 of the Innisfil Official Plan (“OP”) provides an overview of the settlement hierarchy in Innisfil, which consists of Primary Settlement Areas (Alcona), Urban Settlement Areas (Lefroy-Belle Ewart and Sandy Cove), Village Settlement Areas (Cookstown and Stroud) and Hamlets (Gilford, Churchill and Fennell’s Corners). It also outlines growth policies for each Settlement type (policy 9.1). While a majority of growth is directed towards the Primary Settlement Areas, the Innisfil OP does have growth considerations for Village Settlement Areas through intensification, due to existing servicing capacity.

Section 9.8 of the Official Plan outlines policies regarding Settlement Area Boundary Expansions. Policy 9.8.1 indicates that Settlement Area Boundaries are only to be amended through an MCR conducted by Simcoe. Further, policy 9.8.3 encourages Simcoe to prioritize lands abutting the future GO station in Alcona in future expansions – clearly expressing a preference to locate new expansions in proximity to higher order transit.

The Subject Site is located immediately north of the community of Stroud (a Village Settlement Area). Policy 9.4.5 states *“If full municipal services are extended to Stroud or if the servicing capacity of Cookstown is expanded, the Village Settlements may be considered for redesignation as Urban Settlements as part of the Town’s next Official Plan review and the County’s Municipal Comprehensive Review”*. Further, per the Innisfil Master Servicing Plan, Stroud is serviced by a municipal groundwater system. The Stroud system has sufficient water treatment capacity to meet the projected future needs associated with the community’s limited growth to the year 2031. InnServices (the utility service provider) is currently evaluating the groundwater supply and system to determine appropriate measures to ensure reliable water supply for existing residents, but also to accommodate planned growth.

As outlined above, the Town is currently considering the expansion of municipal servicing in Stroud, and the County is currently progressing through a MCR process. Further, the Site is located in proximity to an existing GO Station (Barrie South Go Station). Accordingly, it is an appropriate time to consider a Settlement Area Boundary Expansion to Stroud as part of the current MCR process.

SECTION C – COMMENTS ON SIMCOE OPA 7

As outlined above, the purpose of OPA 7 is to update policies on growth management in accordance with the Growth Plan for the Greater Golden Horseshoe and the Provincial Policy Statement. It is important to note that OPA 7 does not provide for expansion of a settlement areas (outside of Alcona); which is to be dealt with in future OPAs. Commentary on OPA 7 is provided below:

- As noted above, OPA 7 (Table A) categorizes Stroud as a Category 3 Settlement Area. TBG believes this is an appropriate characterization of Stroud.
- TBG would support revisions to OPA 7, specifically to policies 3.2.2 b) and c). TBG would recommend that the Category 2 and 3 Settlement Areas be treated equally with respect to growth priorities, as the primary distinction between Category 2 and 3 Settlement Areas is existence of a delineated built boundary (rather than the physical characteristics of the individual settlement areas). Accordingly, there may be certain Category 3 Settlement Areas (such as Stroud) whose location and physical characteristics may support a greater share of Growth (proximity to higher order transit, proximity to community services and facilities, surrounding land use context).

- TBG supports amendments to OPA 7 which would explicitly permit for expansion of the settlement area boundaries of Category 3 settlement areas, where deemed appropriate through MCR.
- TBG supports the policy direction in OPA 7 which focuses growth to locations with existing or planned transit, with a priority on higher order transit as well as existing or planned public service facilities (3.2.2e iii) & iv).
- TBG supports the intensification targets as set out for Innisfil in Table D as being appropriate for the municipality.

SECTION D – CRITERIA FOR SETTLEMENT AREA BOUNDARY EXPANSION CONSIDERATION

The assessment criteria listed below have received Council endorsement as part of the Planning Our Growth to 2051 Municipal Comprehensive Review process (Innisfil). In order to determine appropriate locations for SABEs the Town of Innisfil has developed an evaluation criterion (based on the input received from Council and County staff). The criteria provides a framework for Council to assess SABE requests. TBG has reviewed the criteria in comparison to the Subject Lands. This analysis demonstrates that the Subject Lands are good candidate to be included in the SABE.

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).*

As part of the ongoing County of Simcoe Municipal Comprehensive Review, the County has completed a Land Needs Assessment (“LNA”) exercise. An Explanatory Memorandum prepared by Hemson Consulting Ltd. (“Hemson”) for the LNA, was initially released October 1, 2021. An updated Growth Forecast and Land Needs Assessment report was released by Hemson on March 31, 2022. According to both documents, the Growth Plan requires that the County plan for 555,000 people and 198,000 jobs by 2051.

The County has been split into two regional market areas (“RMA”). Growth is occurring faster in the Southern RMA where 63% of population growth is forecast to occur. The results of the LNA show that there is a need for 1,156 hectares of land in the Southern RMA, and more specifically that 70.02 hectares of Designated Greenfield Area will be required in Town of Innisfil.

As such, the Subject Site is a candidate for Settlement Area Boundary Expansion given the need for additional lands in Town of Innisfil, and its adjacent to the urban boundaries of both Stroud (south) and Barrie (north).

2. *The expansion does not result in Designated Greenfield Area (DGA) land area capacity that would exceed the 2051 horizon of the Growth Plan.*

This will be achieved through Simcoe’s MCR and LNA processes as described above.

3. *The expansion area will be informed by applicable water and wastewater master plans and stormwater master plans, as appropriate.*

The current Town of Innisfil Master Servicing Plan states that Stroud water system has sufficient water treatment capacity to meet the projected future needs associated with the community’s

limited growth to the year 2031 which takes into account low density residential development. Wastewater servicing within Stroud is provided through private septic systems and no issues have been identified. Currently, there are no municipal wastewater servicing projects recommends for Stroud for the period to the year 2031. However, as noted above, the Town of Innisfil is currently studying the infrastructure required to accommodate planned growth in Stroud.

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 Subject Site is located immediately north of the Stroud settlement boundary. It is also located immediately south of the southern boundary of the City of Barrie. Accordingly, development of the Lands would not contribute to leap-frogging development and would represent a logical expansion of the settlement boundary. Further, based on its location, the Subject Lands would be able to make use of existing community services and facilities as well as transit options in both the City of Barrie as well as the community of Stroud, making it an ideal location for settlement boundary expansion.

5. *The expansion cannot result in land being added to a settlement if that land is situated in another municipality.*

Not applicable to the Subject Lands.

6. *Expansion into a Specialty Crop area and lands subject to the Greenbelt Plan is prohibited.*

Not applicable to the Subject Lands.

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.*

The Subject Lands are not located in any wellhead protection zones.

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.*

The Subject Lands are identified as Prime Agricultural Area per Ontario's Agricultural System Portal. The owner will work with the County and Town to complete an Agricultural Impact Assessment to determine mitigation measures (if applicable). However, it should be noted that the Lands area bound on two sides by existing or planned residential development (north and south). Accordingly, it is not expected that a SABE would present new impacts to the agri-food network.

9. *The expansion area complies with the minimum distance separation formulae (MDS).*

Based on preliminary research in the Ontario's Agricultural System Portal the closest livestock facility is approximately 27 kilometres to the north of the Subject Site in Springwater and therefore there does not appear to be an issue with MDS compliance. See **Appendix 1** for Livestock Mapping. A complete MDS analysis would be completed through a future development application.

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.

See Response to #8. See **Appendix 2** for Agricultural Land Base Mapping.

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.

Town of Innisfil's Designated Greenfield Area density target is 55 residents and jobs combined per Hectare as per County of Simcoe OPA 7. See **Appendix 3**. It is expected that development of the Subject Site could achieve these densities subject to the provision of full services in the community of Stroud.

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.

This criteria expresses a preference for expansion to occur in proximity to MTSA's and GO Stations. The Subject Site is approximately 1.72 kilometres south of the current Barrie South GO Station. Accordingly, expansion of the SABE in northern Stroud would achieve the same objectives as expansion in the vicinity of the Alcona GO Station.

13. The expansion area has appropriately considered matters related to sustainability and climate change.

To be further reviewed through the MCR process.

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.

The following services are within 1.5 kilometres radius of the Subject Site located in Stroud settlement boundary. See **Appendix 4** for Public Services and Facilities Mapping.

- | | |
|------------------------------------|-------------------------------|
| 1. Sunnybrae Public School | 6. Stroud Veterinary Hospital |
| 2. Village North Baseball Diamond | 7. Innisfil Funeral Home |
| 3. Dempster Park | 8. Canadian Farm Animal Care |
| 4. Innisfil Fire Station 3 | 9. Innisfil Wellness Centre |
| 5. Stroud Innisfil Community Arena | 10. Stroud Dental |

It should also be noted that the Lands are in proximity to the southern limit of the Barrie Urban Boundary and will be able to make use of Public Services and Facilities located in the City of Barrie.

15. The expansion area is located where it can support a range and balance of housing (including affordable housing) and employment options.

Assuming provision of full services to Stroud, these elements can be accommodated through future development of the Subject Lands.

16. The expansion area will contribute to achieving compact, walkable, sustainable and healthy communities that enhance a sense of place.

Assuming provision of full services to Stroud, these elements can be accommodated through future development of the Subject Lands. It is also worth noting that the Site is within 1.72km of the Barrie South GO station as well as within 800m of commercial uses located on the east and west sides of Yonge Street within Stroud.

17. The expansion area adequately protects and avoids development within key natural heritage features and hydrologic features.

A review of available MNR, Simcoe and Innisfil mapping does not indicate the presence of any natural heritage features on the Subject Lands. The northwest corner of the Subject Site is regulated Lake Simcoe Region Conservation Area (LSRCA). The client will ensure appropriate measures to ensure protection of key natural heritage features and hydrologic features. The client will work with the municipality and LSRCA to identify developable limits and areas of protections.

18. The expansion area provides an appropriate rural interface.

The Subject Lands are adjacent to urban uses (to the south) and planned urban uses (to the north).

CONCLUSION

TBG provides the information in this letter for review by the MMAH in consideration of OPA 7 as well as for the County and Town in consideration of future SABEs. TBG believes that the Subject Lands are well located for future SABE due to their location between two settlement area boundaries and their proximity to higher order transit and community facilities and services, subject to the provision of full municipal services in Stroud.

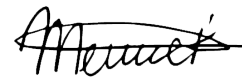
Respectfully,
THE BIGLIERI GROUP LTD.



Michael Testaguzza, MCIP RPP
Senior Associate



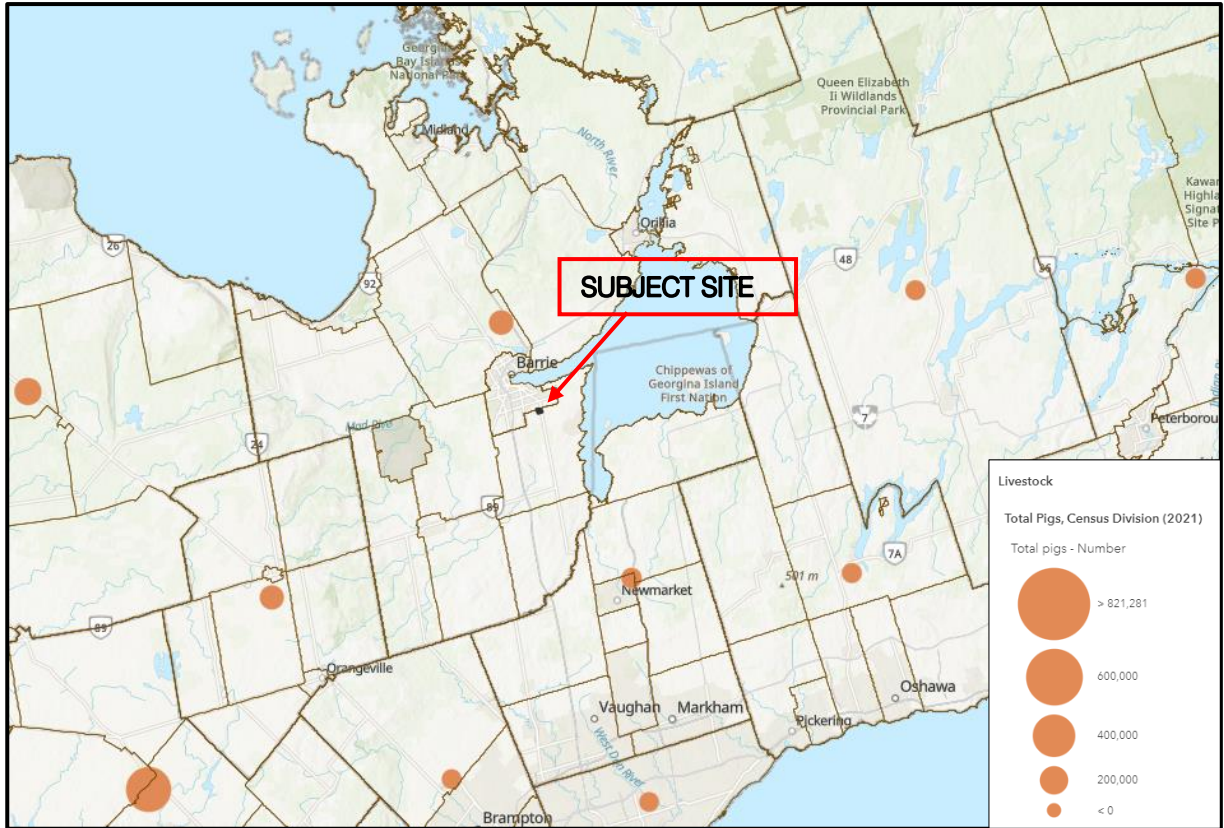
Shilpi Saraf-Uiterlinden, M.E.S. (PI)
Planner



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Planner

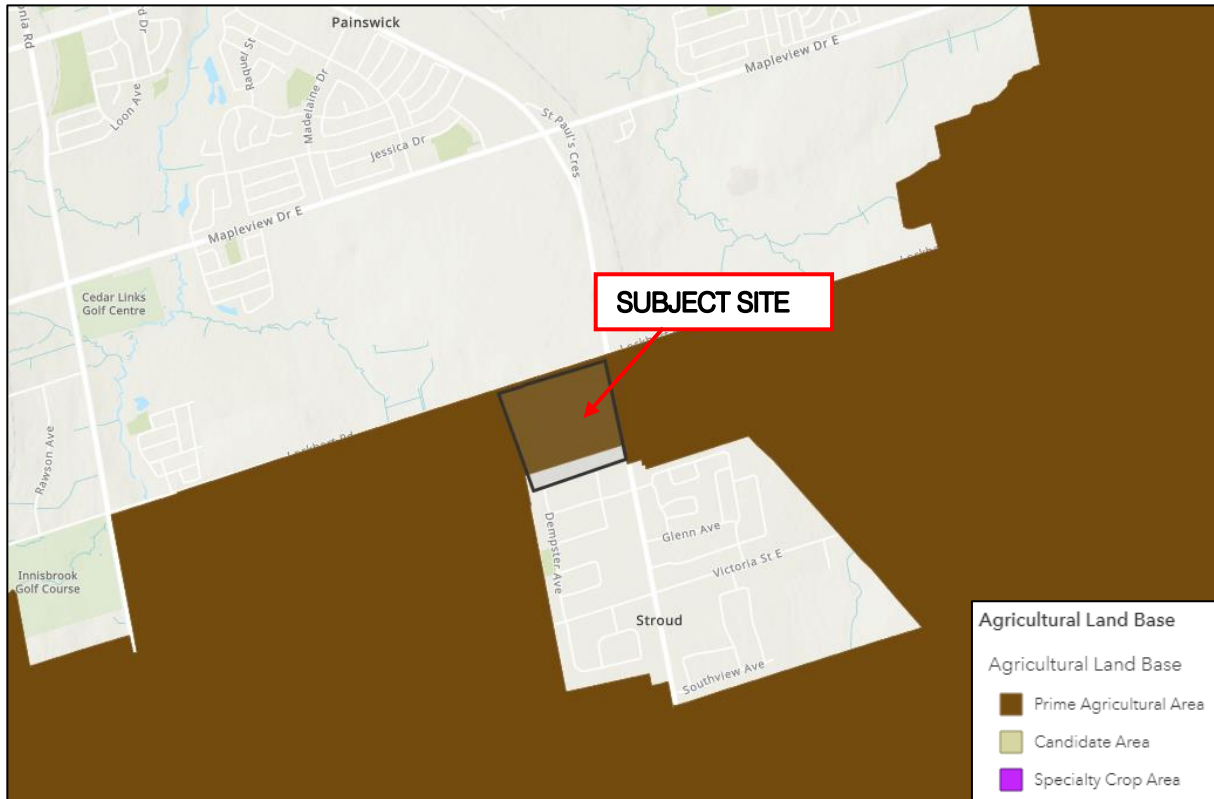
SECTION D – APPENDICE

APPENDIX 1 – LIVESTOCK MAPPING



(Source: Agricultural Systems Mapping)

APPENDIX 2 – AGRICULTURAL LAND BASE MAPPING



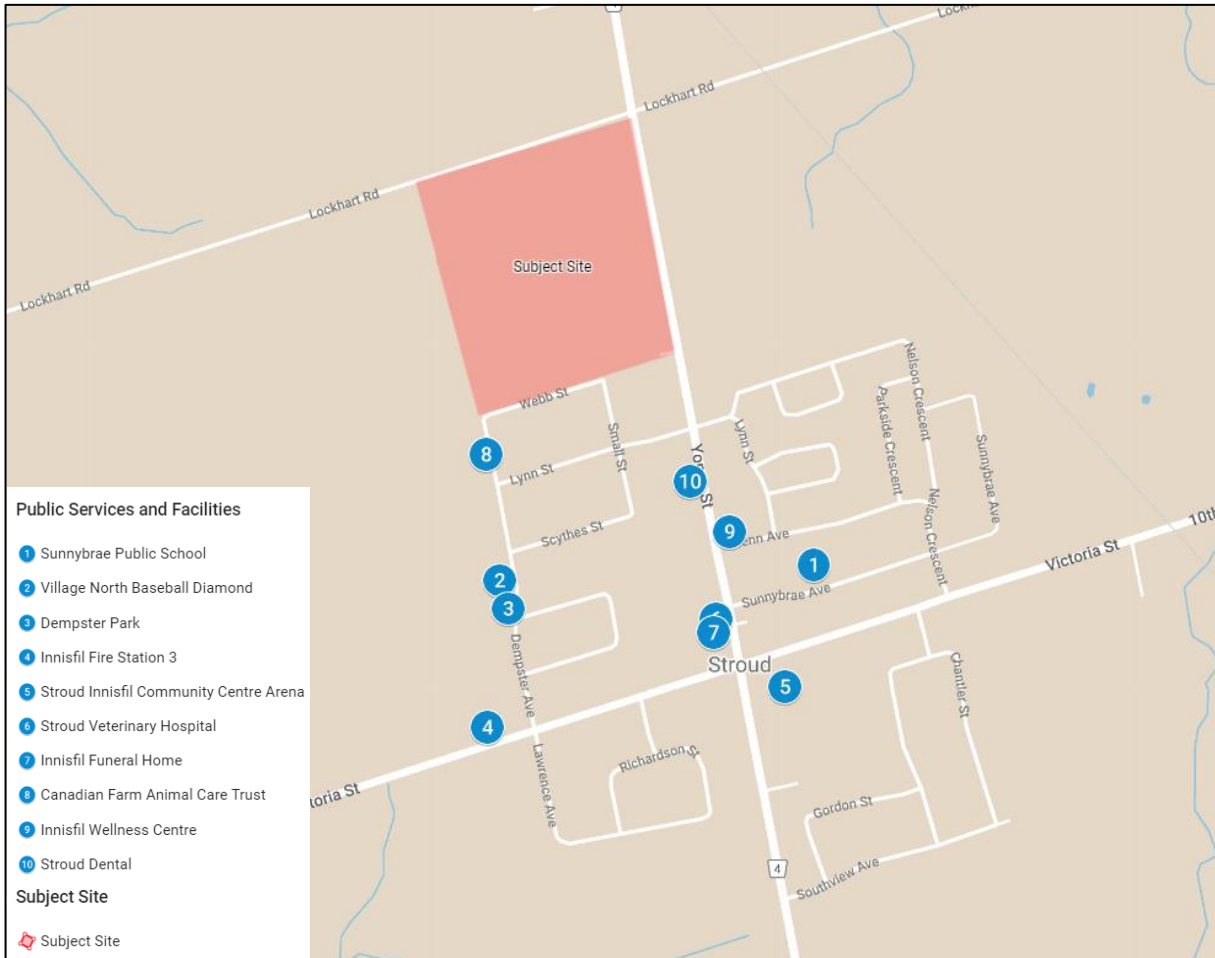
(Source: Agricultural Systems Mapping)

APPENDIX 3 – DESIGNATED AREA DENSITY TARGETS FOR LOCAL MUNICIPALITIES

Local Municipality	Designated Greenfield Area Density Target (Residents and Jobs Combined per Hectare)
Bradford West Gwillimbury	55
Clearview	45
Collingwood	55
Essa	45
Innisfil	55
Midland	55
New Tecumseth	55
Penetanguishene	55
Severn	45
Springwater	45
Tay	45
Wasaga Beach	55
Simcoe County	51

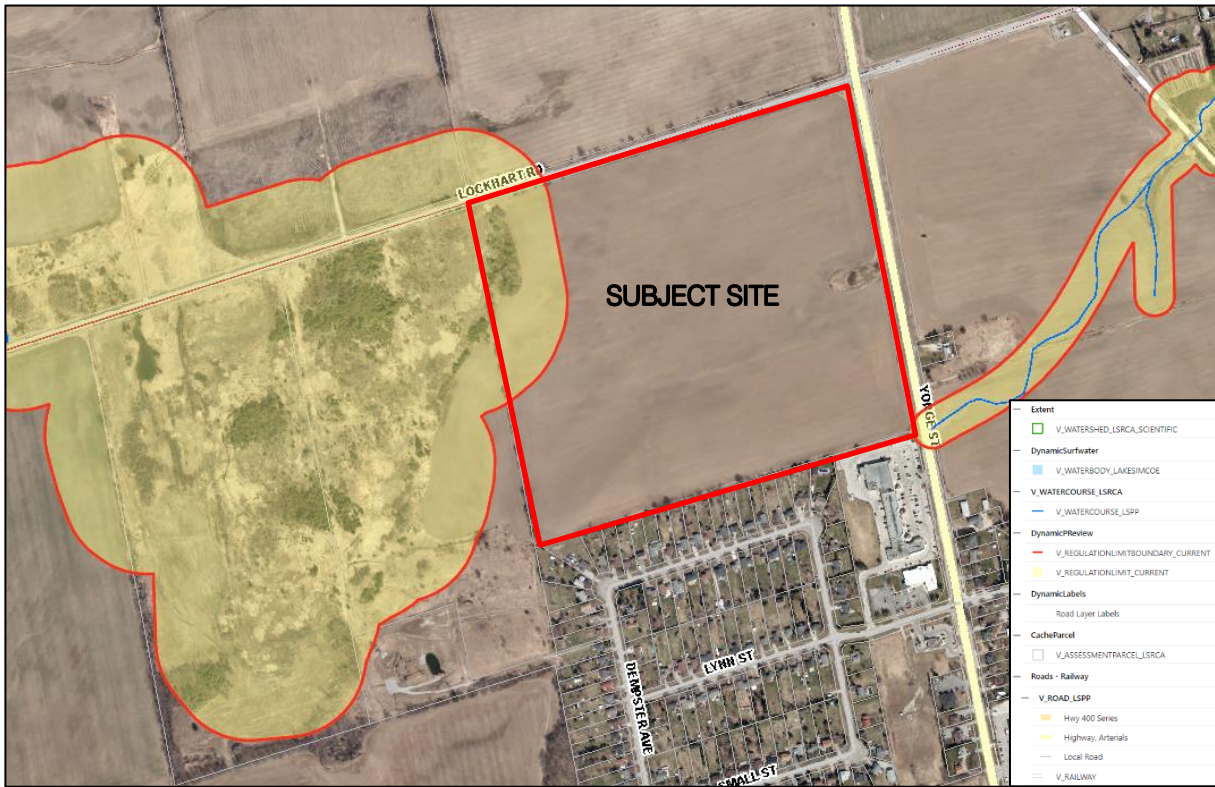
(Source: Simcoe OPA 7, August 2022)

APPENDIX 4 – PUBLIC SERVICES AND FACILITIES MAPPING



(Source: Google My Maps, 2023)

APPENDIX 5 – LSRCA REGULATED MAPPING



Source: LSRCA, 2021