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February 3, 2023

Re: 1643 and 1809 Snow Valley Road, 2636 and 2694 and 2842 Wilson Drive, Township of Springwater (Snow Valley Settlement Area) ERO No. 019-6113 (County of Simcoe OPA No. 7)

This submission is in response to the Environmental Registry of Ontario's posting number 019-6113 with respect to the County of Simcoe's Official Plan Amendment No. 7.

This submission focuses on the lands located at 1643 and 1809 Snow Valley Road, 2636 and 2694 and 2842 Wilson Drive, Township of Springwater. The entirety of the land holdings are within the Snow Valley Settlement Area.

Figure 1 – Aerial Location Map



Purpose of Submission

The purpose of this submission is to request that the province amend Section 3.2.4 (Table B) of County of Simcoe Official Plan Amendment No. 7 by increasing the Township of Springwater's population forecast from 32,490 to 38,490.

Attached to this letter as Appendix A is a conceptual development plan which illustrates that the subject properties can support the achievement of a complete community. The plan includes low-density, medium-density, and high-density residential development, while also providing commercial lands, recreational trail connections and parkland. The concept plan has also been designed to accommodate the continued operation of the Vespra Hills Golf Club. The concept plan illustrates the potential for approximately 1,000 dwelling units.

The request to increase the Township of Springwater's population forecast from 32,490 to 38,490 would accommodate the development of the entire 169-hectare land holding.

Location and Description of Subject Property

The municipal addresses of the subject properties are as follows:

- 1643 Snow Valley Road
- 1809 Snow Valley Road
- 2636 Wilson Drive
- 2694 Wilson Drive
- 2842 Wilson Drive

The total area of the subject properties is approximately 169 hectares (417 acres). Of the 169-hectare land holding, approximately 115 hectares (285 acres) is developed as the Vespra Hills Golf Club, and approximately 30 acres (75 acres) is used agriculturally. There is a stream which traverses the property from south to north.

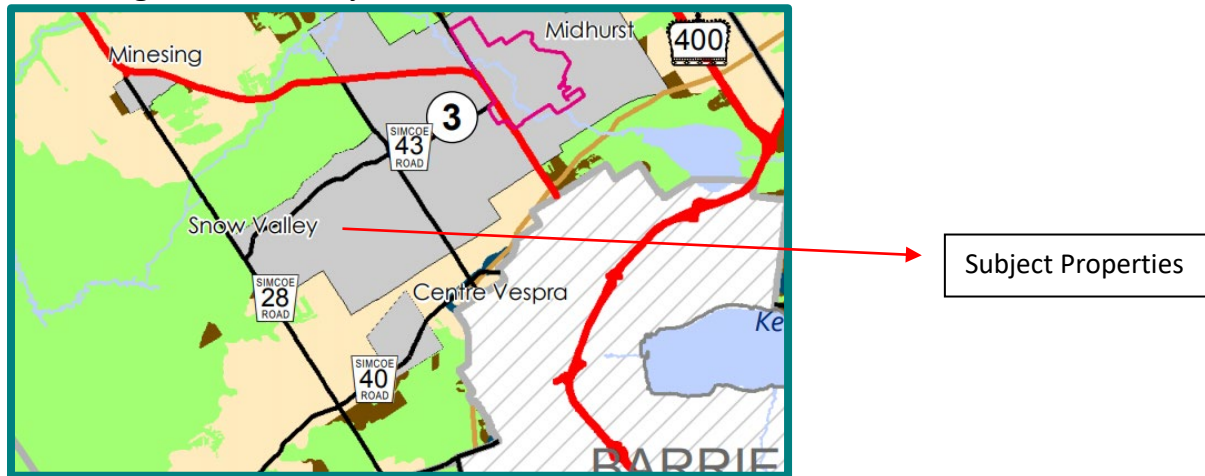
The entire land holding is located within the Snow Valley Settlement Area, however the subject properties do not currently benefit from a land use designation that supports development.

The request to increase the Township of Springwater's population forecast from 32,490 to 38,490 would accommodate the development of the entire 169-hectare land holding, which would enhance the planning policy justification to redesignate the land holdings to 'Urban Residential'.

County of Simcoe Official Plan (OMB Approved December 2016)

The subject property is located within the Snow Valley Settlement Area as illustrated on County of Simcoe Official Plan Land Use Schedule 5.1 (see below).

Figure 2 – County of Simcoe Land Use Schedule 5.1



Section 3.5.7 of the County Official Plan directs that settlement areas shall be the focus of population and employment growth and their vitality and regeneration shall be promoted.

Residential, commercial, industrial, institutional, and recreational land uses shall be developed within settlement area boundaries on land appropriately designated in a local municipal official plan for the use. Land use designation changes within settlement area boundaries do not require a County Official Plan amendment.

The uses permitted within the County's settlement area boundaries may be further restricted or prohibited in the local municipal official plans to facilitate urban development.

County of Simcoe Municipal Comprehensive Review Process

Planning for both residential and employment growth within the County of Simcoe is a top-down process, which takes its direction from A Place to Grow: The Growth Plan for the Greater Golden Horseshoe (“the Growth Plan”).

The Growth Plan stipulates that the County’s population will grow by 194,000 from 361,000 in 2021 to 555,000 in 2051. As the upper tier municipality, the County of Simcoe has the responsibility to allocate this growth, which is done via a Municipal Comprehensive Review (“MCR”) process. The MCR process is currently underway.

As part of the MCR process, the County hired Hemson Consulting to prepare a ‘Growth Forecast and Land Needs Assessment Report’. The Hemson report establishes the long-term growth outlook for the County and ultimately determines the amount of urban land required to accommodate the growth outlook.

The Hemson report was issued in March of 2022. Table 11 of the Hemson report illustrates that the Township of Springwater must plan for an additional 10,170 residential units thru to 2051.

Hemson’s Land Needs Assessment Report informed County of Simcoe Official Plan Amendment No. 7.

The purpose of this submission is to request that the province amend Section 3.2.4 (Table B) of County of Simcoe Official Plan Amendment No. 7 by increasing the Township of Springwater’s population forecast from 32,490 to 38,490.

Township of Springwater DRAFT Official Plan (September 2022)

The Township commenced its Official Plan Review (“OPR”) process within public visioning workshops in 2016 before releasing a discussion paper and growth management strategy in 2018. Final background studies including an Intensification Strategy were released and ultimately accepted by Township Council in September of 2021 and a draft of the Township Official Plan was released for comment in September 2022.

The proposed land use designations pertaining to the subject properties are illustrated on draft Land Use Schedule A-12 (Figure 3 – following page).

The golf course lands are designated Tourist Recreational Open Space and Tourist Recreational Commercial by the draft Official Plan. The 42 hectare parcel situated at the northwest corner of Wilson Drive and Seadon Road is designated Agricultural.

Figure 3 – Draft Township OP Schedule A12 (Snow Valley Settlement Area)



Despite being located within the Snow Valley Settlement Area, residential development is not permitted within any of the three proposed land use designations.

With this letter we respectfully request that draft Official Plan schedule A12 be revised to include the entire land holding within the 'Urban Residential' designation.

The request to increase the Township of Springwater's population forecast from 32,490 to 38,490 would accommodate the development of the entire 169-hectare land holding, which would enhance the planning policy justification to redesignate the land holdings to 'Urban Residential'.

Summary of Justification Amend Section 3.2.4 (Table B) of County OPA No. 7

Section 3.2.4 (Table B) of County of Simcoe Official Plan Amendment No. 7 by increasing the Township of Springwater's population forecast from 32,490 to 38,490.

The foundation of the request to Amend OPA Section 3.2.4 (Table B) to increase the Township of Springwater's population forecast from 32,490 to 38,490 is that the entire land holding is within the Snow Valley Settlement Area, and further, that fully serviced residential growth is occurring to the north, east and west of the subject properties.

Section 1.1.3.1 of the Provincial Policy Statement directs that settlement areas shall be the focus of growth and development.

Section 1.1.3.7(a) of the Provincial Policy Statement directs planning authorities to establish and implement phasing policies to ensure that intensification and redevelopment targets are achieved within designated growth areas. Subsection (b) directs that the phasing policies ensure the orderly progression of development within designated growth areas and the timely provision of the infrastructure and public service facilities required to meet current and projected needs.

Morgan Planning Comment:

Increasing the Township of Springwater's population forecast from 32,490 to 38,490 will enhance the planning policy justification to redesignate the land holdings to 'Urban Residential'. The resultant redesignation to 'Urban Residential' will establish a short-term development horizon for the properties thus encouraging the development community and the Township to begin the infrastructure planning required to accommodate the growth.

A Place to Grow: The Growth Plan for the Greater Golden Horseshoe (the Growth Plan), provides direction regarding where and how to grow. Population and employment forecasts for upper – or single tier municipalities are contained within Schedule 3 of the Growth Plan. Upper and single tier municipalities are responsible for planning for the growth allocated in Schedule 3 in accordance with the policies in subsection 5.2.4 of the Growth Plan.

Section 2.2.1.2 of the Growth Plan provides criteria outlining how and where the population and employment growth is to be directed. The criteria direct the vast majority of growth to settlement areas that:

- i. Have a delineated built boundary;
- ii. Have existing or planned municipal water and wastewater systems; and
- iii. Can support the achievement of complete communities.

Morgan Planning Comment:

The Snow Valley Settlement Area is referred to within the Township's 2021 Growth Management Strategy (GMS) as an 'Intermediate Settlement Area'. Snow Valley is a growing community that is immediately adjacent to Midhurst, which is referred to in the GMS as a 'Major Settlement Area'. The two settlement areas are separated by Wilson Road and are both located within the Township of Springwater.

The growth within Snow Valley and Midhurst is supported by municipal services. It is understood that those municipal services are being and have been constructed by the development community.

Increasing the population forecast for Springwater will assist in establishing a short-term development horizon for the subject properties thus encouraging the

development community and the Township to begin the infrastructure planning required to accommodate the additional growth. Expanding these existing municipal services is likely to decrease the proportional servicing costs to developers within Snow Valley and Midhurst, while enabling growth within a defined settlement area.

Attached to this letter as Appendix A is a conceptual development plan which illustrates that the subject property can support the achievement of a complete community. The plan includes low-density, medium-density, and high-density residential development, while also providing commercial lands, recreational trail connections and parkland. The concept plan has also been designed to accommodate the continued operation of the Vespra Hills Golf Club.

The *More Homes Built Faster Act, 2022, S.O. 2022 (Bill 23)* (the 'Act') received Royal Assent on November 28, 2022. The Province describes the Act as part of a long-term strategy to increase house supply and provide attainable housing options with a goal of building 1.5 million homes in the next 10 years.

The Act implements fundamental changes to nine pieces of legislation related to development in Ontario, including the *City of Toronto Act*; the *Conservation Authorities Act*; the *Development Charges Act*; the *Municipal Act*, the *Ontario Land Tribunal Act*, the *Ontario Underground Infrastructure Notification System Act*; and the *Planning Act*.

One of the fundamental changes to the Planning Act is the role of some upper-tier municipalities, including the County of Simcoe. Upon release and ratification of the implementation regulations the County of Simcoe will be defined in the Planning Act as an 'upper tier municipality without planning responsibilities'. Upon implementation, the County of Simcoe will not have an official plan. Further, the County of Simcoe will no longer be the approval authority for lower-tier official plans, lower-tier official plan amendments or subdivision applications. Upon implementation it is understood that the approval authority for lower tier official plans and official plan amendments will be the Minister of Municipal Affairs and Housing. It is understood that the overarching purpose of these legislative changes is to streamline the development approval processes, to achieve the Province's goal of building 1.5 million homes in the next 10 years.

Another core element of the *More Homes Built Faster Act, 2022* is a housing focused policy review of A Place to Grow (the Growth Plan) and the Provincial Policy Statement (the PPS). The Ministry of Municipal Affairs and Housing (MMAH) is looking to integrate the Growth Plan and the PPS into a new province-wide planning policy instrument that removes or streamlines policies that result in duplication, delays or burden in the development of housing and leverages the housing-supportive policies of both documents. The MMAH is seeking public feedback on the integration of the Growth Plan and PPS via Environmental Registry of Ontario Posting No. 019-6177.

It is understood that the overarching purpose of the integration of the Growth Plan and the PPS is to streamline the development approval processes, to achieve the Province's goal of building 1.5 million homes in the next 10 years.

Morgan Planning Comment:

Increasing the Township of Springwater's population forecast from 32,490 to 38,490 will enhance the planning policy justification to redesignate the land holdings to 'Urban Residential'. The resultant redesignation to 'Urban Residential' will establish a short-term development horizon for the properties thus encouraging the development community and the Township to begin the infrastructure planning required to accommodate the growth.

Accommodating the requested population increase will also assist the province in achieving its objective of building 1.5 million homes within the next 10 years.

Concluding Remarks

The purpose of this submission is to request that the province amend Section 3.2.4 (Table B) of County of Simcoe Official Plan Amendment No. 7 by increasing the Township of Springwater's population forecast from 32,490 to 38,490.

Attached to this letter as Appendix A is a conceptual development plan which illustrates that the subject properties can support the achievement of a complete community. The plan includes low-density, medium-density, and high-density residential development, while also providing commercial lands, recreational trail connections and parkland. The concept plan has also been designed to accommodate the continued operation of the Vespra Hills Golf Club. The concept plan illustrates the potential for approximately 1,000 dwelling units.

The request to increase the Township of Springwater's population forecast from 32,490 to 38,490 would accommodate the development of the entire 169-hectare land holding.

Respectfully submitted,
MORGAN Planning & Development Inc.



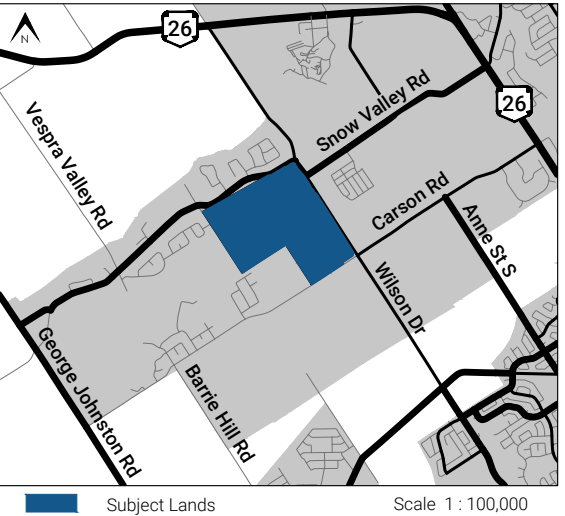
Joshua Morgan, RPP



CONCEPT PLAN

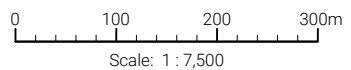
VESPRA HILLS GOLF CLUB

2694 & 2842 Wilson Drive
 Part of Lots 13-15, Concession 7
 Snow Valley, Township of Springwater, County of Simcoe



LEGEND

- Subject Lands
 Lot Area: ±168.939ha (417.46ac)
 To be Developed: ±69.669ha (172.15ac)
 Golf Course Lands: ±93.180ha (230.25ac)
- Low Density Residential
 Saleable Frontage: ±9,560m
- Medium Density Residential
 Saleable Frontage: ±970m
- High Density Residential - ±1.513ha (3.74ac)
- Commercial Blocks - ±3.881ha (9.59ac)
- Park Block - ±3.223ha (7.96ac)
- Stormwater Management - ±3.232ha (7.99ac)
- Walkway/Serviceing Blocks
- Trails



Note: This drawing is for discussion purposes only.
 Boundary to be verified by an O.L.S.

Source: County of Simcoe interactive map.

Drawn By: A.M. | Date: November 22, 2022 | File No: 918



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