

February 3, 2023

Julianna Zhuo
Municipal Services Office - Central Ontario
Ministry of Municipal Affairs & Housing
Province of Ontario
777 Bay Street, 16th floor
Toronto, Ontario
M7A 2J3

Dear Ms. Zhuo:

**RE: SUBMISSION ON COUNTY OF SIMCOE OPA 7 – ERO #019-6113; MINISTRY #43-OP- 221936
2414 CONCESSION ROAD 8, COLGAN, TOWNSHIP OF ADJALA-TOSORONTIO
OUR FILE: 1258A**

On behalf of our client, 2572407 Ontario Inc., please accept this submission regarding County of Simcoe Official Plan Amendment No. 7 (“OPA 7”). Our client is the owner of approximately 100 acres of land in the Village of Colgan in the Township of Adjala-Tosorontio in the County of Simcoe. The property is municipally addressed as 2414 Concession Road 8 and is shown in red in **Figure 1** below (the “Subject Lands”).

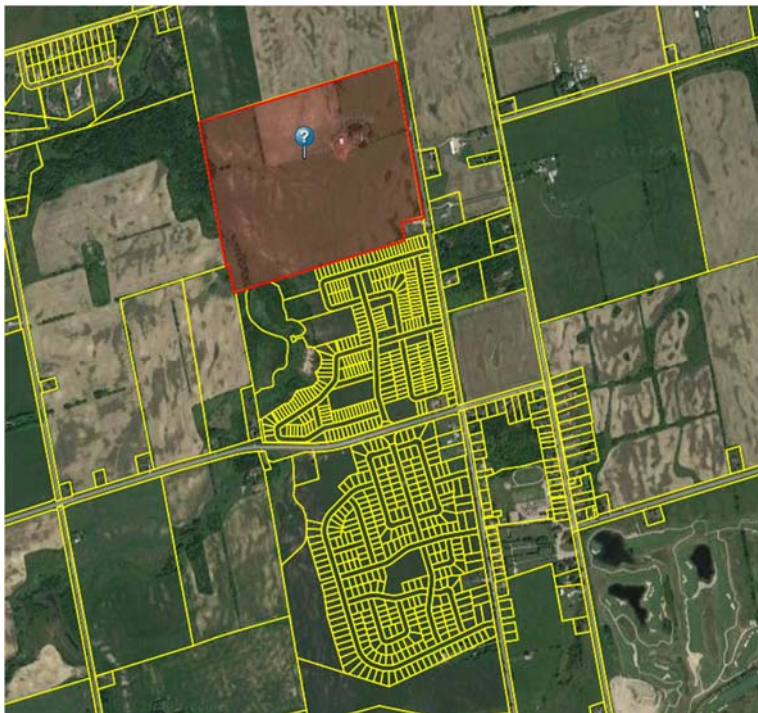


Figure 1: Subject Lands (in red)

Background

The Subject Lands are located to the immediate north of an ongoing subdivision development by Tribute Homes ("Colgan Crossings") as shown below in **Figure 2**.



Figure 2: Demonstration Plan for Tribute's Colgan Crossing Subdivision

It is our client's understanding that through the design and approval of Colgan Crossing, servicing for their development was oversized and can accommodate additional housing units. To this effect, our client has prepared a concept plan for the development of their lands which would utilize this excess servicing capacity and provide additional **353 housing units** and approximately **160 retirement suites** to address the widely reported housing crisis the Province is facing. See **Figure 3** below.

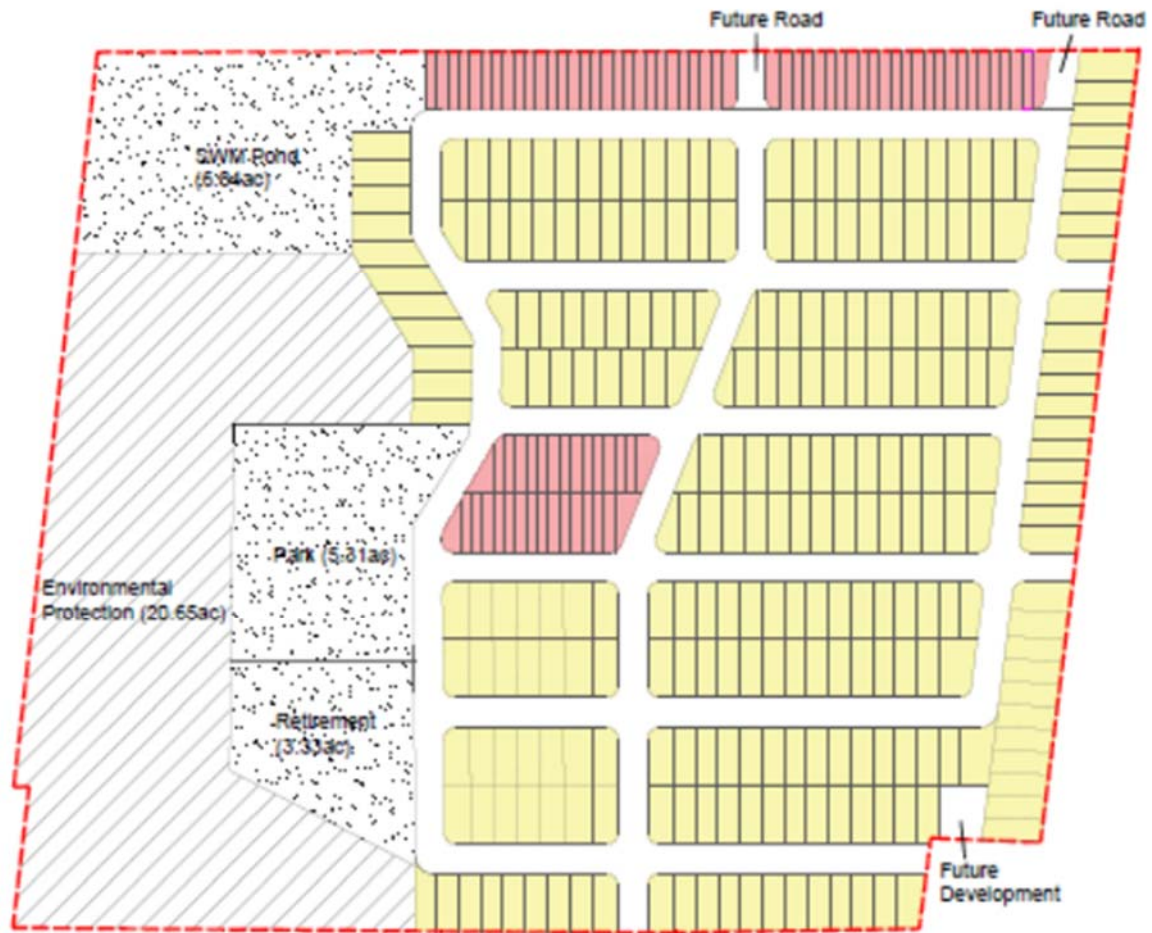


Figure 3: Demonstration Plan for the Subject Lands

Comments on OPA 7

One of the main components of OPA 7 is to incorporate the population and employment forecasts for the County established by the Growth Plan and allocate that population and employment forecasts to the 16 local municipalities. While the County undertook an extensive process to allocate population and employment to each of the local municipalities to 2051, our client believes that the allocation provided to Adjala-Tosorontio Township is not reflective of the existing approved development proposals nor future growth potential, as depicted in the above demonstration plan for the Subject Lands.

To this effect, the County set out the in Table B of OPA 7 the following population allocation for the local municipalities:

**TABLE B
POPULATION FORECAST FOR 2051 BY LOCAL
MUNICIPALITY**

<i>Local Municipality</i>	2021 Population	2051 Population	2021-2051 Increase
Adjala-Tosorontio	11,260	11,970	710
Bradford West Gwillimbury	44,490	83,470	38,980
Clearview	15,220	21,820	6,600
Collingwood	25,470	42,690	17,220
Essa	23,810	34,740	10,930
Innisfil	44,710	84,450	39,740
Midland	18,250	24,290	6,040
New Tecumseth	45,480	80,590	35,110
Oro-Medonte	23,770	26,230	2,460
Penetanguishene	10,340	14,390	4,050
Ramara	10,680	12,870	2,190
Severn	14,750	17,790	3,040
Springwater	22,320	32,490	10,170
Tay	11,410	13,130	1,720
Tiny	13,240	16,010	2,770
Wasaga Beach	25,480	38,090	12,610
Total	360,680	555,000	194,320
Note: Totals may not add precisely due to rounding			

For Adjala-Tosorontio Township the County has only allocated a population of 11,970 to 2051, which effectively represents only a population increase of 710 persons between 2021 and 2051. We note that this is effectively representative of the existing population with limited if no substantive growth in the Township, equating to approximately 23 persons per year or approximately 7 homes being occupied per year. It is interesting to note that no other local municipality has been allocated growth as low as Adjala-Tosorontio Township – even Townships further north have been allocated more population growth.

This lack of growth does not make sense, given that the Tribute Draft Plan of Subdivisions themselves account for 622 new homes and 170 retirement suites, equivalent to approximately 2,036 persons. As noted above, the Subject Lands would further add 353 housing units and approximately 160 retirement suites, equivalent to approximately 1,300 persons. This is in addition to other development applications that are approved and / or in progress in the Township.

It is therefore evident that the County's allocation of only 710 persons does not reflect the existing conditions nor any accommodation for future growth. This limited allocation will result in the servicing infrastructure in Colgan being underutilized and will not allow for further housing to be created to address the housing crisis.

We therefore request that the Province:

1. As there is a need to recognize the existing and future growth in Adjala-Tosorontio Township (estimated at 5,710 persons) that Table B "Population Forecast for 2051 by Local Municipality" be adjusted by either:
 - a. Increasing the overall population allocated to the County of Simcoe, to add 5,000 more population and specifically allocate the additional 5,000 population to Adjala-Tosorontio Township (total of 5,710 persons); or
 - b. Increasing the population in Adjala-Tosorontio Township by reallocating the additional 5,000 population from other local municipalities.
2. Adjusting Table F "Designated Greenfield Area Land Needs for Community Uses and Employment Lands in Local Municipalities – 2021 to 2051" by adding "50 hectares" to Adjala-Tosorontio Township in the column titled "Community Uses (Gross Hectares)".
3. Adjusting Schedule 5.1 "Land Use Designations" by designating the Subject Lands as "Settlement Area" per the map excerpt below:

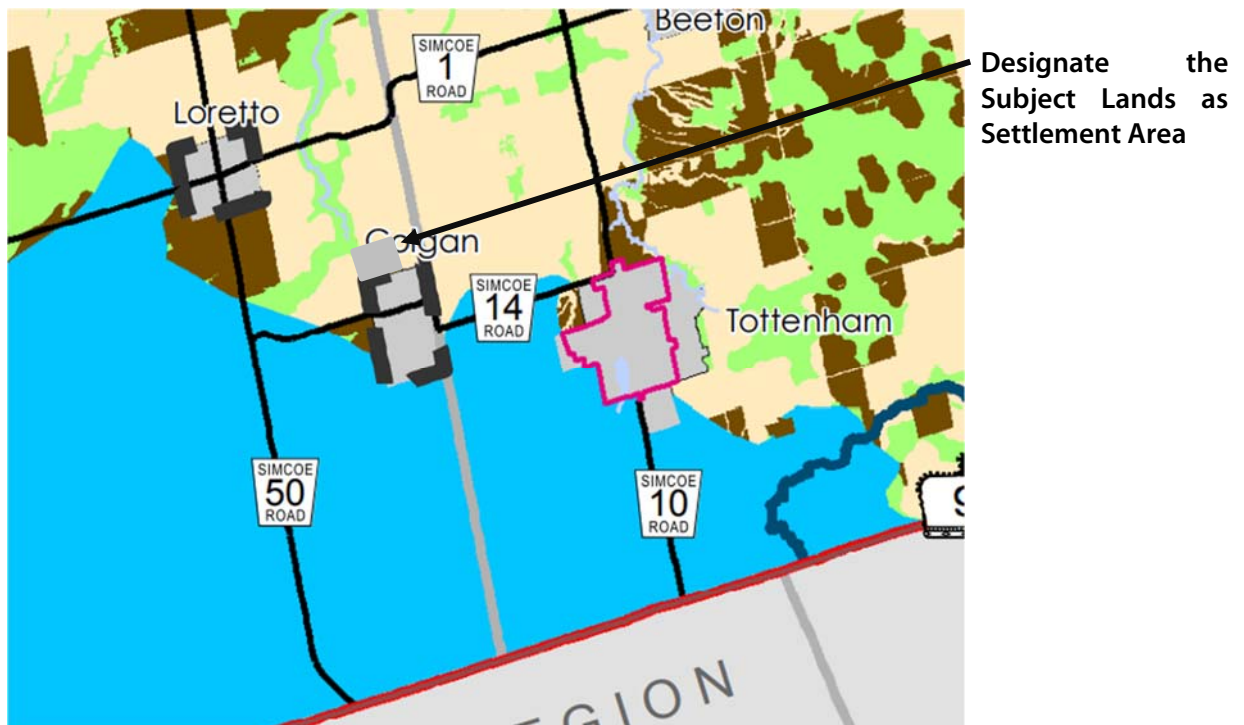


Figure 4: Modification to Schedule 5.1 of the County of Simcoe Official Plan

Please feel free to contact us if you have any questions or wish to discuss in further detail.

Thank you.

Yours Truly,

MHBC

A handwritten signature in black ink, appearing to read 'D. McKay', is written over a light beige rectangular background.

David A. McKay, MSc, MLAI, MCIP, RPP
Vice President and Partner

cc: *Clients*