



February 1, 2023

Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, Ontario  
M7A 2J3

Dear Minister Clark:

**Re: Tribute Communities Response to ERO Number 019-61223  
Ministry File 43-OP-221936, Posted December 5, 2022  
Request for an Easterly Adjustment to the Settlement Boundary of  
Tottenham, Town of New Tecumseth, County of Simcoe**

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On behalf of Tribute Communities (“Tribute”), I am responding to ERO Posting 019-61223, pertaining to Official Plan Amendment 7 to the County of Simcoe Official Plan.

Separate correspondence dated December 20, 2022, has been filed with respect to lands that Tribute owns, located immediately abutting, and east of the existing Settlement Area boundary of Tottenham, within the County of Simcoe. That property is legally described as the South Half of Lot 8, Concession 4, and is municipally known as 6370 4<sup>th</sup> Line.

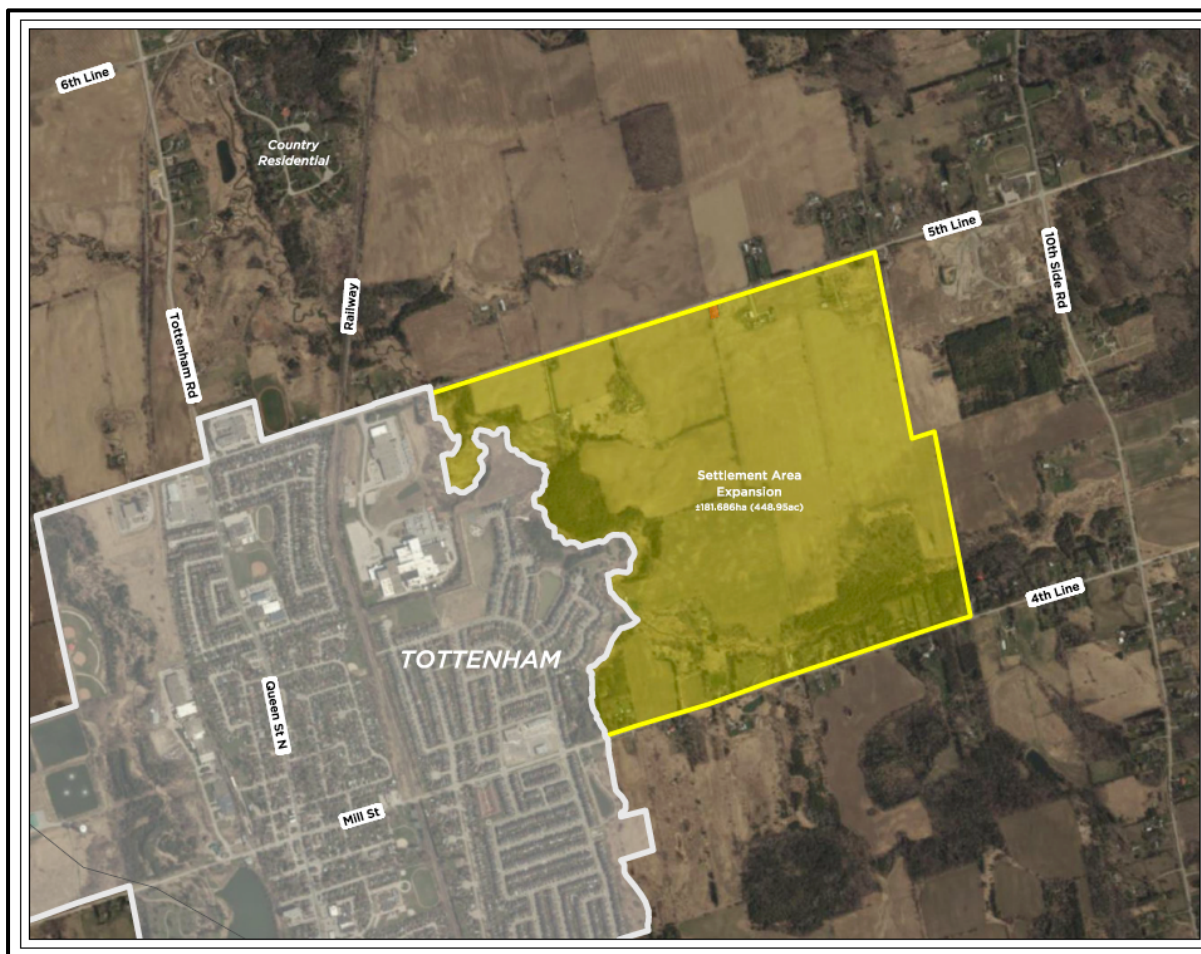
The purpose of this second response is to outline Tribute’s request for the easterly expansion of the Tottenham Settlement to incorporate additional lands, municipally known as 6239, 6303, 6381 and 6449 5<sup>th</sup> Line.

### **Rationale for the Easterly Boundary Expansion to Tottenham**

Based on an analysis undertaken by Hemson Consulting as part of the Simcoe County Municipal Comprehensive Review process, there are insufficient lands within the existing settlement areas in the Town of New Tecumseth to accommodate growth and the analysis found that 448 hectares of lands need to be added to New Tecumseth, however, specific locations were not identified. On behalf of Tribute, a comprehensive Community Area Land Needs Assessment was prepared by urbanMetrics which confirmed the findings of Hemson Consulting that there are insufficient lands within the Settlement Area to accommodate growth, however, urbanMetrics concluded that at least 617 hectares are required to accommodate that growth.

The purpose of this correspondence is to indicate to the Province that Tribute supports boundary expansions within the County of Simcoe generally and more specifically in Tottenham. It is Tribute's specific request that the Province, when making its decision on OPA 7, should clearly delineate the expansion areas throughout the County, including lands immediately east of Tottenham, between the 4<sup>th</sup> and 5<sup>th</sup> Lines, as shown on Figure 1 below.

**Figure 1: Proposed Easterly Expansion of Tottenham**



Tribute has actively participated in the County of Simcoe's Municipal Comprehensive Review process, including the provision of numerous detailed reports which make it clear that the Tottenham settlement area should be expanded. In line with the Province's recently released *Housing Task Force Report*, the inclusion lands east of the Tottenham settlement boundary will assist in



addressing Ontario's housing crisis by providing housing sooner, and with residential densities that respond to the demonstrated need, as well as the opportunity to provide attainable housing.

The lands identified in Figure 1 consist of approximately 182 hectares (450 acres) and could accommodate an estimated 2,500 residential units, consisting of various forms of housing types and tenures, which reflect market demand, all on full municipal services. The 182 hectares includes the 38.5 hectares which were the subject of Tribute's December 20, 2022 response to the posting of County of Simcoe Official Plan Amendment 7 (ERO Number 019-61223). A range and mix of housing types that are attainable could be provided within a density that meets or exceeds the minimum density targets set by the Province and the County of Simcoe.

The planning rationale and technical studies have been completed for a portion of these lands, including analyses in the fields of civil engineering, natural heritage, agronomy, and land economics. These technical reports were provided to the County of Simcoe and the Town of New Tecumseth in August 2021. Addendum reports can be readily prepared and submitted for the additional lands.

### **Tottenham is a candidate community for settlement boundary expansion**

Tottenham is a fully serviced community and is identified in the Town of New Tecumseth Official Plan (2019) as one of the three settlement areas in the Town where future growth will be accommodated. Existing public services in Tottenham include schools, commercial shopping areas, a community and fitness centre, municipal parks, a place of worship, library, fire station and a large recreational area (Tottenham Conservation Area).

The expansion of the Tottenham Settlement Area boundary to the east to include properties municipally known as 6239, 6303, 6381 and 6449 5<sup>th</sup> Line would result in additional resident support of the local economy and the optimization of the public investment in these community facilities. Further, based on the Community Area Land Needs Assessment prepared by urbanMetrics, there is not a sufficient supply of residential lands available in the Tottenham Settlement Area to accommodate the forecast population growth to 2031. Therefore, a Settlement Area boundary expansion is required prior to 2031 to accommodate this forecast population growth and avoid housing shortages.

### **Conclusion**

Based on all of the work completed by the County of Simcoe and by Tribute, it is clear that there needs to be an expansion of the settlement area boundaries within the County of Simcoe in order to accommodate growth to 2051 in accordance with Provincial Policy. The population forecasting work completed by Hemson



Consulting Ltd. and urbanMetrics both demonstrate that there is an insufficient supply of residential lands to accommodate the forecasted growth within the County generally and in New Tecumseth (Tottenham), specifically.

Tribute supports the easterly expansion of the Tottenham settlement area to ensure that proposed growth can be accommodated based on a market-based approach, thereby ensuring that housing will be affordable.

In addition, the work completed by Tribute clearly demonstrates that an expansion of the Tottenham settlement boundary specifically as part of the County's urban boundary expansion to include the Tribute Lands, represents logical and orderly planning. The settlement boundary expansion responds to a clear need articulated by all levels of government (lower tier, upper tier and Provincial) for Urban Residential lands in Tottenham, New Tecumseth, the County of Simcoe, and the Province of Ontario generally.

A decision by the Province to expand the County of Simcoe's settlement area boundaries, including the easterly expansion of the Tottenham Settlement Area will assist both the Town, the County, and the Province in accommodating the forecasted growth on lands that can be readily serviced with the extension of existing municipal water and wastewater infrastructure. Tribute has done a significant amount of work to ensure that they can proceed with the necessary development applications in short order to ensure that homes can be built on the Tribute Lands in the near term.

If additional information is required, please do not hesitate to contact me.

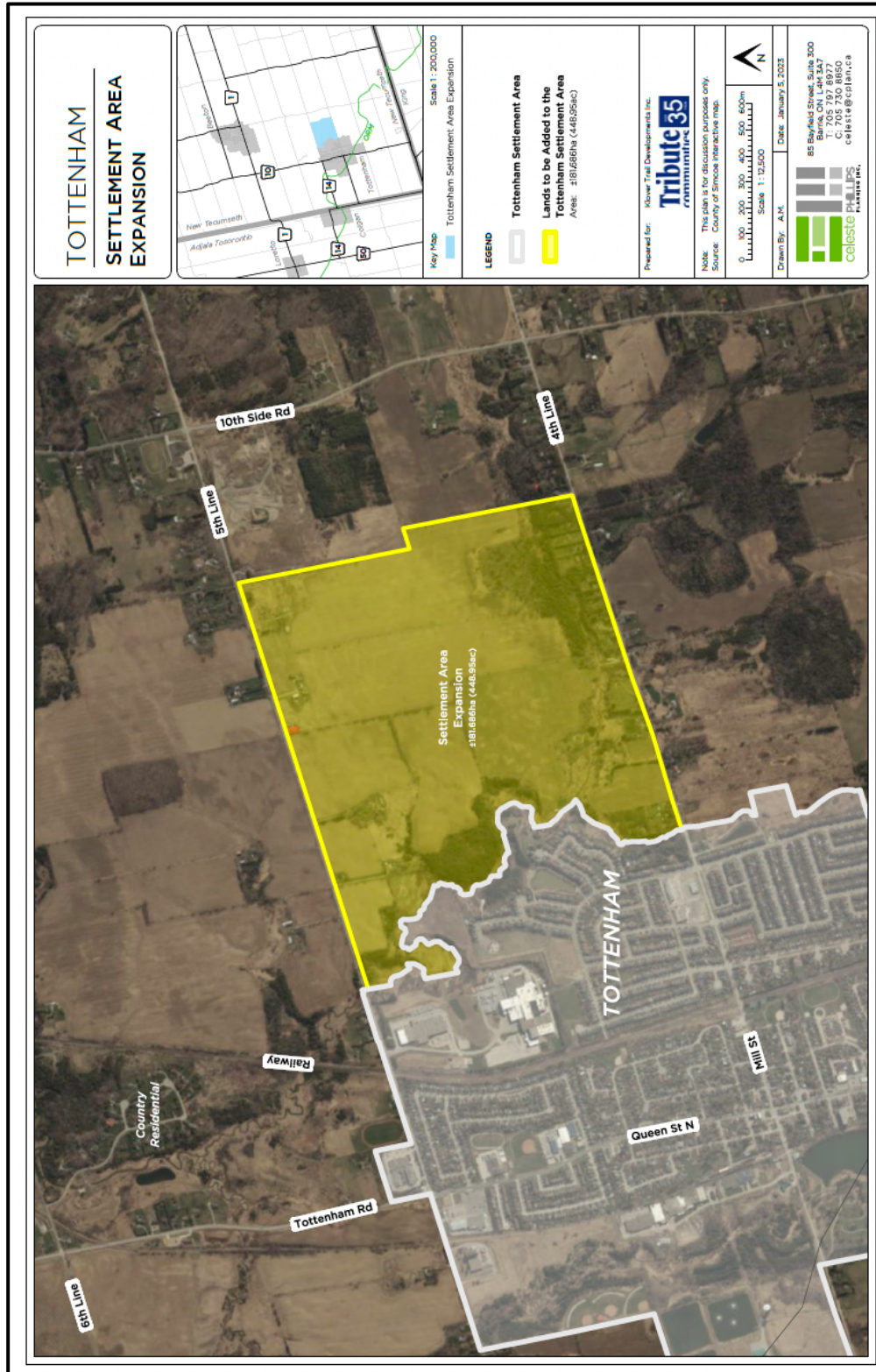
Sincerely,

Celeste Phillips, MCIP RPP

Copy:

H. Evans, ADM, Ministry of Municipal Affairs  
- R. Amato  
- K. Jensen  
Tribute Communities  
- S. Deveaux  
- L. Stocco  
N. Westendorp, County of Simcoe  
B. Hoppe and J. Best, Town of New Tecumseth

85 Bayfield Street, Suite 300, Barrie, ON L4M 3A7  
T 705 797 8977 C 705 730 8850  
[celeste@cplan.ca](mailto:celeste@cplan.ca)



85 Bayfield Street, Suite 300, Barrie, ON L4M 3A7  
T 705 797 8977 C 705 730 8850  
celeste@cplan.ca