

February 3, 2023

**Submission via Environmental Registry of Ontario**

Hon. Steven Clark  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, ON M5G 2E5

**Re: Simcoe County Official Plan Amendment 7 (Phase 1 Growth Management)  
ERO No. 019-6113  
Comments**

We are owners of various development properties in Simcoe County and as such have an interest in the County's Official Plan Amendment (OPA) 7. We have made previous submissions to the County and have enclosed those letters.

We would like to see the Minister make modifications to OPA 7.

Amongst our many comments, we believe that the County should not have constrained itself to a population of 555,000 to 2051 as shown in Table B of Section 3.2.4. As mentioned in the enclosed letters, previous background work indicated a higher possible population and this extra amount should be allocated to the viable Southern Regional Market Areas – specifically New Tecumseth.

Furthermore, we disagree with Table F of Section 3.2.26. We believe the land area required for New Tecumseth's Community Uses is insufficient. The density targets for the area are too high and the probability of re-development within the Built-Up Area boundaries are probably much lower than the background studies would suggest. This leads to an inability to actually realize the population targets that have been allocated. Given that this area does not have the amount of environmentally sensitive areas as other areas of the Greater Golden Horseshoe, it should be a prime candidate for designating more land for Community Uses.

We would like to thank you for your consideration of these comments and we would be available to discuss.

Yours truly,

**MILLFORD DEVELOPMENT LIMITED**

Frank Orsi

-encls.

August 5, 2022

**E-Mail only to: [clerks@simcoe.ca](mailto:clerks@simcoe.ca)**

County Council  
County of Simcoe Administration Centre  
1110 Highway 26  
Midhurst, ON L9X 1N6

**Attention: John Daly, County Clerk**

Dear Warden Cornell and Members of Council:

**Re: Committee of the Whole | August 9, 2022 | Item 19.1  
CCW 2022-235 | Official Plan Amendment 7 – Growth Management (Phase 1)**

We are owners of various development properties in Simcoe County and as such have an interest in the County's draft Official Plan Amendment (OPA) 7. We provided our written comments on November 12, 2021 to County Planning Staff and a letter to Council June 23, 2022.

We do not believe Council should adopt this OPA as written.

I thank staff for reviewing comments and responding in a comment matrix in the above-mentioned Staff Report. However, the responses do not reflect my comment. (For reference, I have been identified as #17 in Schedule 7 of the Staff Report.)

I do not have an issue, generally, with the delineation of the built up areas as they are mapped today. (I do happen to have a concern with the intensification targets within them for certain areas.)

My largest concern, and my first comment, was that I did not agree that Simcoe County should constrain itself to a population of 555,000 when the Growth Plan clearly allows this to be treated as a minimum.

In a presentation by Hemson Consulting Ltd. to the Ministry of Municipal Affairs and Housing titled Greater Golden Horseshow: Growth Forecasts to 2051 (August 26, 2020), slide 72 (enclosed) makes reference to Simcoe having a population in a high range of 571,000. For that reason, and the ramifications on affordability as a consequence of these constraints, we believe this OPA should be using a higher population target and New Tecumseth should be the candidate for more growth than currently contemplated.

Staff may or may not agree with my comments; nevertheless, my comments should be categorized correctly for Council's benefit.

We thank you for the consideration of these comments.

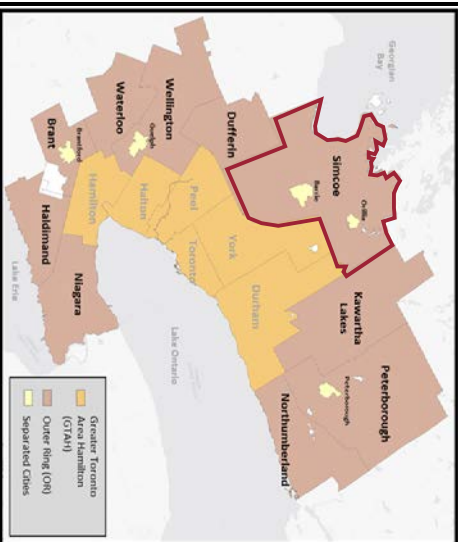
Yours truly,

**MILLFORD DEVELOPMENT LIMITED**

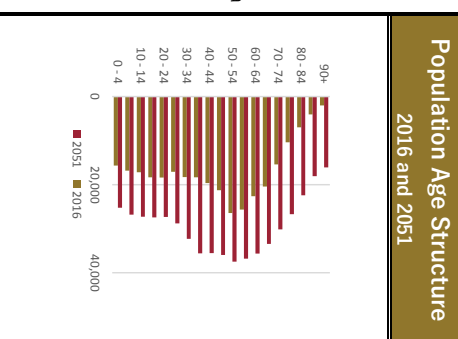
Frank Orsi

Encls. -Slide 72 - Greater Golden Horseshow: Growth Forecasts to 2051 (August 26, 2020)  
-Letter dated June 23, 2022  
-Letter dated November 12, 2022

# County of Simcoe



The County of Simcoe, in the Outer Ring, is located due north of the GTA, to which it is connected by Highway 400. The County's economy is diverse, and includes agricultural, industrial, and tourism-related employment. Urban areas in the south have experienced rapid growth in recent years due to in-migration from the GTA and the relative proximity to jobs in York Region and Toronto. Major employers in the south include a large automotive plant (Honda) and Canadian Forces Base Borden. In the north, urban centres such as Collingwood and Wasaga Beach have also experienced growth, fuelled by the settlement of retirees, second home owners, and tourism. The 2012 Schedule 3 forecasts somewhat underestimated the population of the County in 2019 but slightly overestimated the County's 2019 employment. The 2020 forecasts assume continued steady population and employment growth, building on recent trends.



Year	Population		Housing By Type <sup>1, 2</sup>				Apartment		Total
	Reference	High	Low	Singles/ Semis	Rows	Accessory Units	Rural	Total	
2011	284,000	284,000	284,000	93,600	4,500	1,200	7,200	106,500	
2016	315,000	315,000	315,000	102,100	5,600	1,400	8,500	117,600	
2021	357,000	358,000	357,000	111,000	8,400	1,500	9,900	130,800	
2031	417,000	420,000	414,000	135,900	14,500	1,800	14,100	166,300	
2041	484,000	492,000	476,000	159,900	20,200	2,200	18,700	201,000	
2051	555,000	571,000	540,000	180,200	24,900	2,500	22,300	229,900	
2016-51 Growth	240,000	256,000	225,000	78,100	19,300	1,100	13,800	112,300	
Year	Reference	Employment		Employment By Type				Total	
		High	Low	Major Office	Pop-Related	Emp. Land	Rural		
2011	98,000	98,000	98,000	1,000	51,000	18,000	27,000	98,000	
2016	110,000	110,000	110,000	1,000	57,000	25,000	27,000	110,000	
2021	117,000	117,000	117,000	1,000	64,000	24,000	28,000	117,000	
2031	141,000	143,000	139,000	2,000	76,000	35,000	29,000	141,000	
2041	167,000	173,000	162,000	2,000	89,000	47,000	29,000	167,000	
2051	198,000	210,000	188,000	3,000	103,000	63,000	30,000	198,000	
2016-51 Growth	88,000	100,000	78,000	1,000	46,000	38,000	2,000	88,000	

1. The housing forecast does not replicate/predict the housing mix that would be determined through each municipality's AP/IG conformity work. Planned housing mixes will continue to be decided by municipalities through their local planning processes.  
 2. Singles/Semis includes single-detached and semi-detached houses as well as movable dwellings as defined by Statistics Canada for the Census. Singles/Semis also includes existing houses where an accessory unit has been added. Rows are row houses as defined for the Census. Accessory Units are apartments added to an existing single-detached or semi-detached house. Apartments comprise all apartment buildings, whether greater than or less than 5 storeys.



June 23, 2022

**E-Mail only to: [clerks@simcoe.ca](mailto:clerks@simcoe.ca)**

County Council  
County of Simcoe Administration Centre  
1110 Highway 26  
Midhurst, ON L9X 1N6

**Attention: John Daly, County Clerk**

Dear Warden Cornell and Members of Council:

**Re: County Council Meeting | June 28, 2022  
Municipal Comprehensive Review (MCR)  
Draft Official Plan Amendment – Growth Management (Phase 1)**

We are owners of various development properties in Simcoe County and as such have an interest in the County's draft Official Plan Amendment (OPA). We provided our written comments on November 12, 2021 to County Planning Staff as part of the MCR and after having reviewed the draft OPA we do not support this document as written. We provide our comments below: first as an overview and then by Item Number mentioned in the OPA.

### **Overview**

We agree with the County's approach to create "regional markets" and agree that the "Southern Regional Market Area" should have most of the population allocated to it.

Policy 5.2.4.2 of the Growth Plan allows the County to treat the 2051 population number (555,000) as a minimum. We would like to see a higher total population thus allowing higher allocations to the Southern Regional Markets. Based on previous numbers in the 2017 Growth Plan, and the high amount of growth Simcoe County has been experiencing for the last few years as York Region fills up, we thought the 2020 Growth Plan would have used a 2051 of population at least anywhere from 575,000 to 600,000; hence the "minimum".

We believe the minimum intensification targets and density targets within designated greenfield areas (DGA) are too high. An alternative would be to set the minimums to reflect the prescribed rates within the Growth Plan and allow the lower-tier municipalities to establish higher rates as part of their very detailed MCR's / OP Reviews.

Existing DGA's which are already in approved development areas with previously completed secondary plans, master plans, oversized servicing, and development approvals should not have to go through additional reviews or be mandated by the County's higher targets. Targets can be increased in the currently unapproved areas.

It is important to recognize that designation through an OP does not mean development will occur within the built-up area (BUA). First, one must consider the opportunity of cost of on-going operations over that of re-development; the property owner may be satisfied with the status quo. Second, one must consider the lower probability of small parcels merging to form a decent sized development; small projects may not be worthwhile ventures and capital flows to the more attractive opportunities. Then, there is a question of availability in the remaining servicing capacities or other defects that the older areas may experience (e.g. flooding). As part of a Special Council Meeting on April 12, 2022, a Land Needs Assessment Presentation was given where Slide 46 mentions "Lots of Potential for Redevelopment in Southern RMA" which was followed by a few maps which showed potential areas. We would question the analysis for New Tecumseth properties and this consequently impacts land needs.

We are all for intensification; however, it needs to be implemented at the right time, in the right market, and in the right place. Although it may be counter-intuitive, as we try to create affordable units by mandating increased density targets and restricting the supply of low-density detached units, we may actually be causing unaffordability. Therefore, I question the ambitious targets of intensification in the draft OPA during this review period.

### **Items as Amendments in the OPA**

- **Item 18**

- Section 3.2.4 – Table B

We note that 2051 population numbers for Bradford, Innisfil, and New Tecumseth are lower in the OPA than in a previous draft from the fall 2021. We would like to see these populations increased (especially New Tecumseth).

- Section 3.2.6 – Table D

The intensification target for New Tecumseth (37%) is too high. We doubt the probability of achieving this target.

- Section 3.2.7 – Table E

DGA density targets for Bradford, Innisfil, and New Tecumseth are too high at this time. 40 should be used.

- Section 3.2.7 e)

Recommend to add the word “new” in front of designated greenfield areas; approved areas should not have go through this planning process or held back by the creation of new areas.

- Section 3.2.7 g)

Minimum designated GFA target densities should be on a town-wide basis. The first sentence, while laudable for using the word “intention” in describing the target density to be applied to the site, should be followed up by replacing the words “wherever possible” to “wherever reasonable.”

Furthermore, when it comes to renewing draft plans, “diversifying the housing mix will be required where possible” should be changed to “encouraged where feasible.” A small draft plan cannot have an assortment of every unit type. In multi-phased plans, there may be pre-serving or sales where making modifications would just be intolerable and unreasonable.

- Item 24

- Section 3.2.24 – Table F

The gross hectares for New Tecumseth should be increased.

- Section 3.2.27

The following criteria should also be included when considering adding additional GFA:

x) the settlement area to be expanded completes the community by adding a range of land uses in an appropriate area

xi) employment conversion requests have been considered in the context of the 2051 planning horizon

- Item 34

- Section 3.5.9

This section applies to a town, such as New Tecumseth, where there is a primary settlement area and other settlement areas. We understand this section refers back to Section 3.2.2 and its use of the vague term of “a significant portion” when referring to population allocation to the Primary Settlement Areas. The Growth Plan also uses the term “significant portion” in Section 6 when explaining the population allocation to the Simcoe Sub-area; having compared the numbers, and in both the 2017 and 2020 versions, it would seem as though significant would imply a value

of about 61%. Therefore, more guidance should be provided to assist the local municipality in what significant means so as not starve the second category of Settlement Areas in Section 3.2.3 Table A of future population and growth. A further sentence should be added to Section 3.5.9 to describe the importance of increasing the population to these areas which in doing so has better potential to increase the experienced service level for the currently smaller populations.

- Item 85

Schedule C shows the Conceptual MTSA for Bradford. We understand that Section 3.2.11 allows the Town of Bradford to further refine the boundary as part of its future OPA. However, we take issue with the nearly 900m eastward stub along Bridge Street. We do not see it as an area for residential intensification with the prescribed minimum density target of 150 r&j per ha. On both sides, it backs onto the protected Holland Marsh where there is on-going farming operations. The context of this area needs to be taken into consideration and not just by mapping from the Town's urban boundary. The residents would not want to be subjected to noise or odor and more amenities are needed to create a community than just a train stop. We believe this area should remain with a commercial designation, especially if they provide support services to the marshland or is an on-going farming operation itself, and removed from the MTSA. In the alternative, the MTSA should be stopped at 300m eastward at Given Road. It would be a waste of Town resources to attempt to grow in multiple directions simultaneously and it should not be encouraged to do so.

We value the public consultation process and we wish to thank Council for taking these comments into consideration. It would also be appreciated if Staff could report back on all comments received. We would request to be notified of any future meetings and provided with a notice of the decision.

Yours truly,

**MILLFORD DEVELOPMENT LIMITED**

Frank Orsi

November 12, 2021

By E-Mail: [greg.marek@simcoe.ca](mailto:greg.marek@simcoe.ca)

By E-Mail: [dan.amadio@simcoe.ca](mailto:dan.amadio@simcoe.ca)

Greg Marek, MCIP, RPP  
Manager of Planning (North/West)  
County of Simcoe  
1110 Highway 26  
Midhurst, ON L9X 1N6

Dan Amadio, MCIP, RPP  
Manager of Planning (South/East)  
County of Simcoe  
1110 Highway 26  
Midhurst, ON L9X 1N6

Dear Sirs:

**Re: Simcoe County Municipal Comprehensive Review - Growth and Land Needs Assessment**

We are the owners of certain lands in Simcoe County and wish to comment on the Growth and Land Needs Assessment as part of the County's Municipal Comprehensive Review (MCR).

We understand that Schedule 3 of A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the Growth Plan) allocated a population of 555,000 to the County to 2051. However, Section 5.2.4.2 of the Growth Plan states:

All upper- and single-tier municipalities will, at a minimum, through a *municipal comprehensive review*, apply the forecasts in Schedule 3 or such higher forecasts as are established by the applicable upper- or single-tier municipality through its *municipal comprehensive review* for planning and managing growth to the horizon of this Plan.

It seems as though the Province will allow the County to increase the population by more than prescribed (hence the 'at a minimum') and we believe in the current context of strong housing demand in the GGH that the County should do so. We agree with the County's approach to create "regional markets" and agree that the contemplated "Southern Regional Market Area" should have most of the population allocated to it.

The Provincial commitment to build the Bradford Bypass (linking Highway 400 to the 404), in addition to future upgraded train service, compels us to recommend allocating more population than shown in the first draft MCR schedules to the two most southern (viable) regions: Bradford West Gwillumbury and New Tecumseth.

Given the Lake Simcoe Protection Plan and the future prospect of the Upper York Sanitary Plant, there may be a constraint on servicing capacity for Bradford; New Tecumseth is another candidate for growth. (In one instance, we are owners of 94 acres of land adjacent to the Beeton Settlement Area, directly south of the Simcoe Manor, and will be requesting those lands be included in a boundary expansion as they

were prior to the OMB hearing of OPA 31. A letter to the municipality describing the lands has been enclosed. Consequently, we would be requesting that these lands be removed from agricultural mapping.)

We are also owners of industrial lands in Bradford. In Bradford's previous OP review in 2016, a background study for employment lands by Urban Metrics implied that absorption rate at the time created 200 years of supply. We are starting to see an increase in demand with the newly announced Bypass along with the progressing trend of increasing warehousing closer to the customer as e-commerce surges. However, we do not believe the Town requires 115.3 hectares of additional employment lands given the current vacancies.

Another trend we are seeing is a preference of employees to continue working from home or adopting a hybrid model as the new normal in the post-pandemic world. A survey conducted by PWC Canada showed only 10% of office workers preferred the traditional in-person setting. This trend increases demand for larger residential units with home-office space as people work from home. This trend proposes to create jobs within residential areas which is another way of meeting employment targets in an area versus on designated employment lands. (This is not to be confused with jobs created out of community needs.)

This leads to more land being required for lower density residential purposes which is why we have concerns for the increased density targets for Bradford, New Tecumseth and Innisfil. In the case of Bradford, we do not know how achievable increasing the target from 40% to 45% in the Built Up Area will be; 7,425 units made up of 79% apartments seems too high a number given the market demand for this area. Bradford's OP created a downtown core, where we own lands, to specifically intensify the BUA – but the designation would only go so far. We would also question the 8,006 units needed in New Tecumseth's BUA with 80% apartments. In the case of Innisfil, we do not understand how the higher densities anticipated for the Orbit lands fit into the chart; consequently, we do not know if the Designated Green Field target is being increased to 55 due to the Orbit.

In short, we see an affinity for 'lower' density housing in Simcoe County and we have concerns that this planned economy does not reflect market preferences. This in turn is one reason, amongst many, leading to future price increases for the product because the market is being prevented from achieving equilibrium.

We thank you for the opportunity to provide our comments and we look forward to future iterations of the plan.

Yours Truly,

**MILLFORD DEVELOPMENT LIMITED**

Frank Orsi

encls. – letter to New Tecumseth Nov. 12, 2021

November 12, 2021

By E-Mail: [jb@newtecumseth.ca](mailto:jb@newtecumseth.ca)

Jennifer Best, MCIP, RPP  
Director of Planning & Building  
Town of New Tecumseth  
10 Wellington St. E.  
Alliston, ON L9R 1A1

Dear Madame:

**Re: Report #PD-2021-45 – Municipal Comprehensive Review Update on Growth Management**

Millford Development Limited and Mod-Aire Homes Limited are the registered owners of approximately 94 acres of land located in the southeast corner of the 8<sup>th</sup> Line and 10<sup>th</sup> Side Road adjacent to the current settlement boundary of Beeton and across of the Beeton Manor. These lands are legally described as part of the north half of Lot 11, Concession 7, Tecumseth (the Subject Land).

We are writing in response to Staff Report #PD-2021-45 to the Committee of the Whole dated September 13, 2021. We note that the County of Simcoe is conducting a Municipal Comprehensive Review to allocate additional population to the year 2051 to the lower tier municipalities across the County. While the Town of New Tecumseth has yet to initiate its Official Plan Review process, landowners have been writing into the Town to have their lands considered for future growth. Given the history of the Subject Land, we feel it should be considered for an area of boundary expansion, if it was not being considered already, and added to the request map at this time.



Map showing the Subject Land

## History

As it relates to the Subject Land, the owners granted an easement to the Corporation of the Village of Beeton (the name at the time) on November 25, 1980 for the purposes of the municipality to install and maintain its watermain to the Beeton Springs Reservoir. This has been registered as Instrument Number 858840 and is shown on Part 2 of Reference Plan 51R-14208 which generally runs north-south bisecting the Subject Land. (It's our understanding that the current size of this watermain is 400mm.)

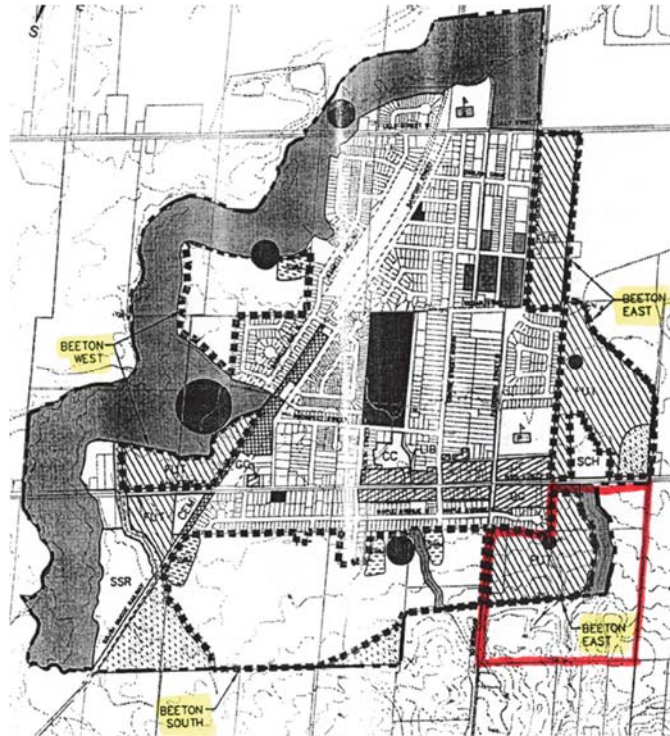
It was on May 9, 1986 that our plan of subdivision was registered as Plan 51M-254 with the residual remaining as the Subject Land. This Plan created Maple Avenue, 23 lots, a block for stormwater management (SWM), and a block of approximately one acre in size fronting the 8<sup>th</sup> Line; this was the limit of the settlement area at the time. The one acre block (beside the newly built Simcoe Paramedics Station) is designated as Corridor Commercial in the current OP and remains vacant while the SWM block remains in our private ownership although it has been assumed.



Map showing 51M-254 and remaining block fronting 8<sup>th</sup> Line from the Subject Land

## Official Plan Amendment 31 (Beeton Community Secondary Plan)

In 2004, the Town of New Tecumseth initiated the process to review the Secondary Plan of Beeton (OPA 31) including background studies and a Master Servicing Plan. Draft Schedule 'A' to OPA 31 dated June 2004 shows the Subject Land as being included in the proposed settlement boundary as part of the 'Beeton East' expansion area. The drawing had designated the Subject Land as 'future residential' and even showed a location for a future park.



Map from Draft OPA 31 Schedule A – Beeton Secondary Plan (June 2004)

However, it was determined that there was not enough population to be allocated and the final iteration of the Beeton Secondary Plan had reduced the expansion of the boundary which omitted the Subject Land and other lands from it. This matter had been appealed to the Ontario Municipal Board (Case Number PL060354) where Mod-Aire was granted participant status. In the Board’s Order issued December 5, 2007, the Member included a statement from Mod-Aire requesting “that if the Town of New Tecumseth is successful in obtaining an increased population allocation in the current County of Simcoe Growth Management Study, the Beeton Community should be a candidate for some of that population allocation.”

**Development Context**

The Subject Land is suitable for development as analyzed by high-level background studies previously conducted during the OPA 31. The soils are mapped as being a silty clay loam and have good drainage characteristics. There is a woodlot feature in the very southeast corner of the land; however, in respecting current policy, buffering can be used to minimize disturbances and promote stewardship of the natural heritage feature. It should be noted that the draft Natural Heritage System mapping (Oct. 25, 2021), derived from Provincial mapping, being conducted by North-South Environmental, as part of Simcoe County’s MCR, does not include any



features on the Subject Land. Mapping also shows that the Subject Land is outside of regulated flood hazard areas.

The Subject Land is adjacent to the existing settlement boundary and local infrastructure. There is existing residential to the west and to the north there is supporting commercial retail (e.g. grocery store, retail, Tim Horton's, etc.) Not only is the commercial retail within walking distance, an elementary school exists within 800m of the Subject Land. Furthermore, having frontage on both primary arterial and arterial roads, as classified by the OP, this accessibility presents itself to allow for a range of mixed uses and occupancy types. Moreover, the Beeton Manor has a redevelopment plan approved by Simcoe County to create an age in place community producing an attractive, vibrant area. For these reasons, amongst others, the Subject Land should be considered a highly suited candidate for an area boundary expansion.

We recognize the Town may be creating principles and establishing criteria to evaluate lands for consideration. We look forward to participating in the Town's Official Plan Review Process and would be available to discuss our proposal at a future time.

In the meantime, we plan to enclose this letter with our correspondence to Simcoe County as it conducts phase one of its MCR.

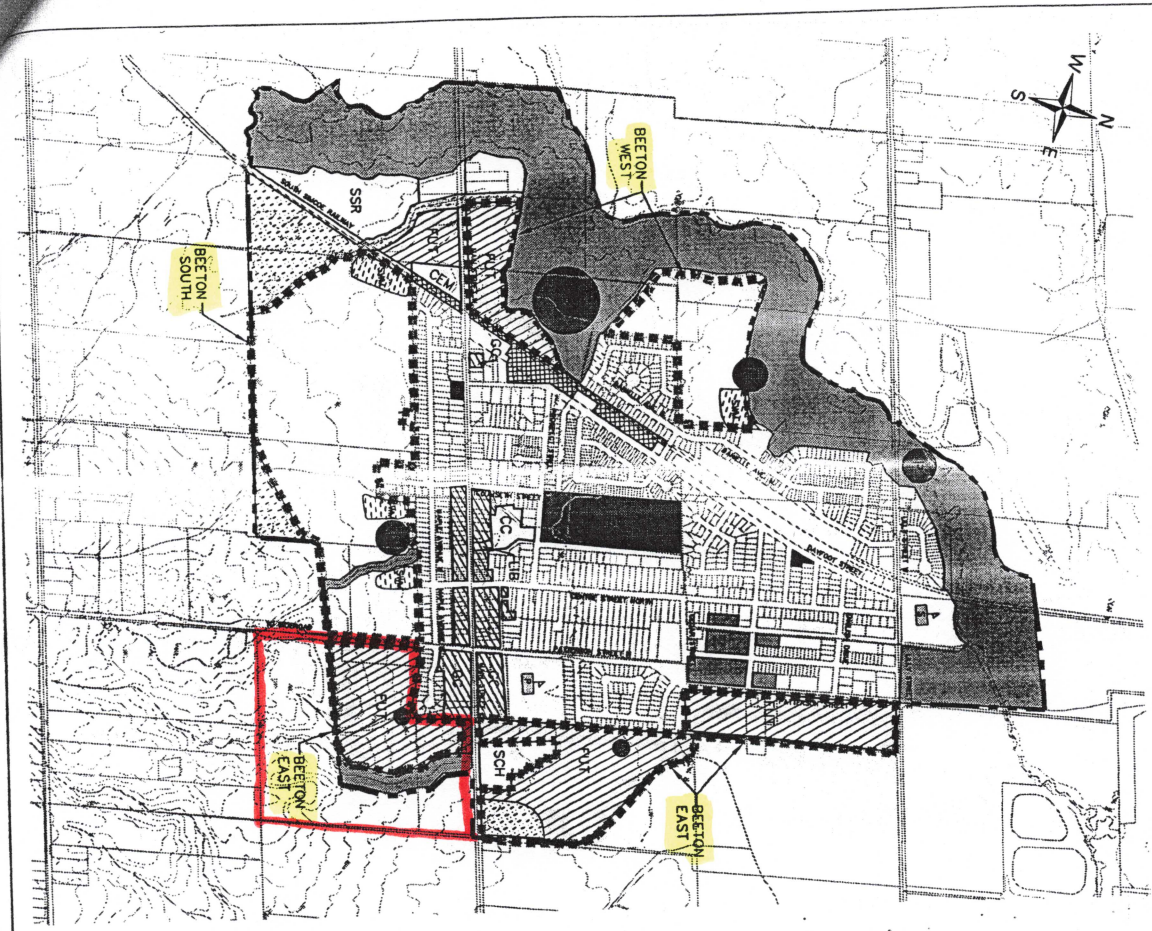
Yours Truly,

**MILLFORD DEVELOPMENT LIMITED**

Frank Orsi

encls.

cc Jim Craig – Mod-Aire Homes Ltd.



COMMUNITY OF BEETON  
 TOWN OF NEW TECUMSETH  
 SECONDARY PLAN  
 MASTER SERVICING PLAN  
 DRAFT - BEETON SECONDARY PLAN  
 SCHEDULE 'A' TO OFFICIAL PLAN  
 AMENDMENT NO. 31

PUBLIC MEETING - JUNE 9 2004  
 SCALE = 1:15000

- LEGEND:**
- COMMUNITY BOUNDARY
  - ▨ LOW DENSITY RESIDENTIAL
  - ▧ FUTURE RESIDENTIAL
  - ▩ VILLAGE (URBAN) COMMERCIAL
  - ▤ STORMWATER MANAGEMENT FACILITY
  - ▥ URBAN INDUSTRIAL
  - ▦ SPECIAL POLICY DISTRICT (LIMITS TO BE DETERMINED)
  - ▧ OPEN SPACE - HAZARDOUS LANDS
  - ▨ OPEN SPACE - ENVIRONMENTAL PROTECTION
  - ▩ VILLAGE (GENERAL) COMMERCIAL
- PARK LAND**
- NEIGHBOURHOOD PARK
  - LOCAL PARK
- INSTITUTIONAL**
- Ⓢ SCHOOLS (S) (P)
  - ⓐ CEMETERY
  - Ⓛ LIBRARY
  - ⒸⒸ COMMUNITY CENTRE
  - ⓈⒸ SENIOR CITIZENS HOME
- SPECIAL USE**
- ▭ SSR SOUTH SIMCOE RAILWAY

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