

Rescue Lake Simcoe Coalition
120 Primeau Dr.
Aurora, ON
L4G 6Z4



To Innisfil Council
CC Mary Nordstrom, Tim Cane

**Re: Innisfil and Simcoe County Municipal Comprehensive Review, and October 20, 2021
community meeting**

Dear Mayor Dollin and Innisfil Council,

October 15, 2021

1. The Orbit Ministers' Zoning Order (MZO) for up to 150,000 people has not been included in the Hemson Land Needs Assessment (LNA) calculation for Innisfil. This is a fundamental problem that has to be fixed for Hemson's numbers to make sense. Staff must translate the verbal commitment at the Sept 20th meeting to building up not out, into a land needs assessment for Innisfil that allocates no more land for development than the Orbit, given Council's commitments to the Orbit and the approved development "in progress".
2. Currently, the Hemson breakdown for Innisfil identifies a need for 178 hectares of land - EXCLUDING the Orbit - for future development to 2051. This has to be justified, and as stated above, there should be zero need for new land other than the Orbit.
3. The Hemson LNA does not appear to follow the Growth Plan policy mix for housing types. Single / semi (49%), Rows (13%), Apartments (34%) are the three types listed and these amounts represent the mix needed to achieve the Growth Plan directives. It is unclear why the Innisfil Designated Greenfield allocations are: Single / semi (78%), Rows (10%), Apartments (12%). We believe the DGA allocations have to be in line with the direction from the province. There is too much in the single family home category.
4. Population - doubling to 84,000 by 2051 according to the County. This is going to be a massive challenge to accommodate, and it will be dusty and annoying for residents.

5. We are led to believe by the consultant on the Oct 5th Simcoe County Land Needs Assessment presentation, that MZOs are not included in the population allocations. Staff has to reconcile this. This is going into Innisfil's Official Plan, and these numbers make no sense. The Orbit MZO would accommodate the entire population projection allocated to Innisfil from Simcoe County. In fact, at full build out as pitched to the people of Innisfil, it would accommodate three to four times more people than Simcoe County's population allocation to Innisfil thus far.
6. Reject outright any applications for settlement area boundaries expansions that infringe on the Oak Ridges Moraine or Greenbelt.
7. Reject outright any applications for settlement area boundaries that are not contiguous with existing settlement area boundaries.
8. Reject those settlement area boundary expansion requests in places with few services, ie. Churchill, Lefroy, Gilford.
9. Reject any settlement area boundary expansions on forested land. Innisfil's forest cover, at 28%, is far below the watershed target of 40% high quality natural cover and has a history of approving development in forested areas once in the Environmental Protection land category. See https://rescuelakesimcoe.org/wp-content/uploads/2020/08/Innisfil_Community_Mapping_Report_final.pdf
10. In keeping with the Lake Simcoe Protection Plan, reject any settlement area boundary expansion requests on wetlands of ANY size and regardless of designation.
11. This massive change in the community population and structure is an opportunity to plan well. Building up and intensifying to achieve transit supportive densities of 80 - 100 R&J/Ha and aiming to create 15 minute communities is what the Town should aim for, in strategic built up areas. More low density single use subdivisions is what the Town should plan to stop planning for. There is plenty in the "pipeline" anyway.
12. Intensification - It is unclear if the Orbit lands are considered to be part of the settlement boundary area. If it is, given the commitments to the Orbit and statements made by Council and the Mayor, there is no more need to sprawl into more farmland. That is why Council voted 7-2 for an MZO for this project. Therefore if we assume that the Orbit is within the Built Up Area, the Intensification rate in Innisfil should be 100%.
13. Intensification targets - (the percentage of new growth that goes into existing built up areas)
 - An appropriate minimum intensification target (previously 33%) for annual residential development within the Town's delineated built-up areas (Alcona and Cookstown); 60%.

- An appropriate minimum density target (previously 32 residents and jobs per hectare - R&J/H) for the Town's designated greenfield areas (areas of Alcona and Cookstown outside of delineated built-up areas); 80 R&J/H as per the 2017 Growth Plan. Let's not go backwards.
 - An appropriate minimum density target for the Town's Strategic Growth Areas (the Downtown Commercial Areas of Alcona, Sandy Cove, Lefroy, Cookstown, and Stroud) 200 R&J/H.
 - An appropriate minimum density target for Major Transit Station Area (Orbit/Innisfil GO Station). 300 - 400 R&J/H.
14. Consider this in your allocations of attainable housing. We do not support simply dealing with affordable or attainable housing by relying on the County to build towers. There is so much wrong with that approach, financially and socially. Because the Town has wisely revised their bylaws to allow for more secondary suites and garden suites in existing homes, the ability exists to redevelop a lot for intensification like front/back splits and multi unit buildings that are the same height or one story higher than the surrounding community. These would be a cheaper, more redistributive, and less intrusive way to provide more affordable housing than towers, and does not ghettoize people. It helps address the housing affordability crisis in Simcoe County, the middle class of home owners, is potentially faster to achieve than waiting for apartment buildings to be built, and reduces the number of acres needed for new growth. Innisfil should consider that 5% -10% of the high density apartment units would be unnecessary if this secondary suite program is promoted along with the Ontario program offering \$30k to homeowners who renovate to that end. <https://www.ontario.ca/page/add-second-unit-your-house>. Further, a proportion of townhomes could be replaced with uptake of this model. And it costs the Town virtually nothing, which is good, because the Town has virtually no money.
 15. Housing affordability analysis is needed at the municipal level. It is part of the required Land Needs Assessment process and has not been done at the County level. To not plan for them is an insult to residents of Simcoe County who are struggling to find appropriate housing.
 16. Infrastructure reports are needed at the municipal level for water, wastewater servicing, garbage, landfill, and the costs of delivering services to various areas. Environmental Assessments will be needed for any development that triggers an expansion of the sewage treatment plant. We understand that Innisfil is close to that sewage capacity limit and we certainly know that Lake Simcoe has reached its limit. Current phosphorus loads are more than double the ecological target.
 17. The areas that I would most object to being considered for settlement area expansions, referring to the map Sched 2 in this package from Aug 10th: <https://www.simcoe.ca/Planning/Documents/CCW%202021-265.pdf>.

ISABEQ 20012 in a massive wetland between Belle Ewart and Alcona

ISABEQ-2105 Churchill - prime agriculture, beautiful countryside, not close to any services or shopping except the Go bus and the world's smallest library. Forests on the south edge of this property form part of a continuous band of forest that should be protected.

ISABEQ 2102

ISABEQ 2101

ISABEQ 2109

ISABEQ 2009

ISABEQ 2016

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Claire Malcolmson".

Claire Malcolmson

Executive Director, Rescue Lake Simcoe Coalition

The Rescue Lake Simcoe Coalition is a lake-wide member-based organization, representing 28 groups in the Lake Simcoe watershed, that provides leadership and inspires people to take action to protect Lake Simcoe. www.rescuelakesimcoe.org