

November 12, 2021

County of Simcoe
1110 Highway 26
Midhurst, Ontario L9X 1N6

Submitted via email to: Dan Amadio & Greg Marek
dan.amadio@simcoe.ca, Greg.Marek@simcoe.ca

Dear Mr. Amadio and Mr. Marek,

We, as local community organizations, call on Council to stop urban sprawl in our County so that we can build the healthy, affordable communities that we want and need. Please accept this correspondence as our official comments to the first phase of the MCR process. It has been communicated to us that there will be additional, meaningful opportunities to provide comment as technical reports are completed and a draft OP is released to the public *prior* to finalization of the MCR by the County..

Overall, we ask that you adhere to the first theme of the County's Growth Management Strategy in the Official Plan and choose to move towards creating 15-minute communities within existing built-up areas. In 15-minute communities, "the wide range of land uses provides an opportunity for people to live, work, shop, and find recreation in one compact community" (p. 10). The County's current Official Plan shares this vision, with goals that include:

"to protect, conserve, and enhance the County's natural and cultural heritage";

"To implement growth management to achieve lifestyle quality and efficient and cost effective municipal servicing, development and land use";

"to achieve coordinated land use planning among the County's local municipalities and with neighbouring counties, districts, regions, and separated cities, and First Nations lands;

"to further community economic development which promotes economic sustainability in Simcoe County communities, providing employment and business opportunities;

and "to promote, protect and enhance public health and safety." (p. 5).

Municipalities are responsible for about 50% of domestic carbon emissions; therefore, we have a responsibility and opportunity to make changes that benefit everyone living in Simcoe County (including future generations), take climate action and protect the planet. We have the chance to address the usual planning problems and take on the

dClimate Emergency at the same time – this is a win-win-win for all of us across Simcoe County.

General Recommendations

- **The County of Simcoe should delay any further approval processes for the MCR until the proper analyses are completed and information has been released to the public and stakeholders for meaningful consultation.**

It is our view that the County's process to date has been characterized by a significant lack of information and analysis – in particular to the Land Needs Assessment as well as major Growth Plan policy requirements in relation to water/wastewater/stormwater and housing. This lack of information and analysis has made any meaningful and informed public review and comment virtually impossible and the County's efforts in this regard woefully insufficient.

The missing analyses directly impact the Land Needs Assessment and their absence means any potential settlement expansions identified in that assessment are premature at best and that the County's Municipal Comprehensive Review is not in conformity with various infrastructure, growth management, housing and environmental policies of the Growth Plan.

Other municipalities such as the City of Orillia and the Regions of Durham and Halton have outlined that they will not be able to meet the 2022 deadline as they want to ensure the full analysis is completed. Considering the outstanding amount of analysis and information lacking from the County's MCR process so far, we feel it is appropriate for Simcoe to delay finalizing the MCR to ensure proper study and public consultation.

With that said, there are still general recommendations that we believe would strengthen the County's MCR process and outcomes going forward.

- **Implement a 60% average intensification target and a designated greenfield area density target average of 77 residents and jobs per hectare;**

Research concludes that sprawling development costs a lot more than dense development. Higher-density development is much more cost-effective for infrastructure and servicing, while sprawl ends up being subsidized by municipalities and taxpayers (Trubka, et al., 2010; Environmental Defence, 2013; Diamond & Thompson, 2013; Thompson, 2013; OECD, 2018; Environmental Defence 2019). Moving towards an intensification-first approach and higher densities in the DGA reduces costs of servicing and increases municipal revenue realized from the communities built.

- **Divest from highways and road expansions and consider more effective, evidence-based methods for congestion reduction while reducing commute times for residents;**

It is clear that transit supportive, walkable communities are more effective at reducing congestion while also addressing GHG emissions. Highways and road widenings invoke induced demand, a well documented phenomenon, that increases congestion over time which ultimately makes them an unviable investment. Consistent with GHG reduction We must transition swiftly to active transportation and public transit to dramatically reduce car-dependency. This has co-benefits for public, mental and social health. Although the County's Master Transportation Plan outlines improvements and investments in transit and active transportation, there is still a high reliance on new highways, road widenings and new interchanges. This is the opposite of what must be done to not only alleviate congestion, but to also reduce GHG emissions and car dependency.

- **Develop a climate action plan that enacts a climate lens in all planning decisions and that prioritizes protecting and improving the health of residents**

A County-wide GHG reduction strategy that changes the structures and systems of how we build and invest in communities must be implemented as soon as possible. Transportation and buildings greatly add to GHG emissions and thus we must focus on how to reduce car dependency, decenterize built form that is GHG intense and decrease travel distances. This GHG reduction strategy should include increasing active transportation and reducing car-dependency (i.e. not reliant on EVs); increasing density for energy and infrastructure efficiency; and accountability measures to keep the County in line with GHG reduction targets through to 2051. This must be in addition to 'mainstreaming' climate change into the Official Plan. Considering the urgency of climate action, we believe that it is reasonable to withhold any settlement boundary expansions until the County's GHG reduction strategy is completed which should include examining land use planning and its contributions to GHG emissions.

- **Lead a servicing costs study with local municipalities to determine the cost of growth across the County to inform the LNA**

Recently, Hemson completed a cost-analysis for the City of Ottawa and found that sprawl costs the municipality \$465/person every year, while high-density infill saves the municipality \$606/person every year. Edmonton, Calgary, Halifax and Kingston and others have done similar analyses with similar results. Therefore, it is reasonable to assume similar cost savings would be calculated for the County and yet none of this work has been done to inform where growth should go to ensure a fiscally responsible way to prepare for an increase in our population. Since the County is responsible for the population allocations, it seems logical that the County would want to have a fully

informed position prior to making said allocations. Despite the County not being financially responsible for the servicing infrastructure, it is the recognized planning authority and, as such, needs to work with the lower tier municipalities to ensure alignment with various planning regimes and sets a tone for growth that is socially, financially and environmentally sustainable. Servicing has massive financial implications for municipalities, and should be included in the MCR process as a matter of fiscal due diligence. Residents also deserve to be informed of these financial impacts to them and their communities, as a matter of transparency.

- **Conduct a housing analysis to inform the LNA**

Although the Growth Plan requires municipalities to plan for the affordable housing needs of current and future residents – which are defined as households in the 0-60th income percentiles- there is no information or analysis in relation to household incomes of current and future residents nor are there any targets for affordable housing. This is imperative in Simcoe County where an aging population demands housing of various types and price points. Analyses are required in order to inform the MCR as to which types of housing are needed to conform to the Growth Plan housing policies. This information is fundamental to understanding market demand as household income/affordability are key to determining what housing types would be needed which in turn would directly inform the Land Needs Assessment – as more multi-residential (ie. affordable) housing types require less land.

The Simcoe County MCR has not demonstrated conformity with the Growth Plan housing policies and cannot move forward with any potential settlement expansions until this analysis is undertaken, integrated into the Land Needs Assessment and made publicly available for review and comment.

- **Complete water, wastewater and stormwater master plans to inform the LNA**

Watershed studies have well documented that both Lake Simcoe and the Nottawasaga River watersheds are in various states of degradation that already approved development will exacerbate. There has been no demonstration that identified land needs contained in the MCR Land Needs Assessment can be accommodated without causing negative impacts and/or exceed the assimilative capacity of these watersheds. There is no record of any collaboration with respect to coordinating with other municipalities (ie. York and Durham Regions – Lake Simcoe, Grey and Dufferin Counties – Nottawasaga River) which share and depend on these watersheds for water and wastewater. Integrated infrastructure and planning analyses have not been undertaken nor are there any water, wastewater and stormwater master plans.

The 2020 Growth Plan specifies that municipalities are to coordinate sewage allocations in policy 3.2.6. 4) Water and Wastewater Systems. This too would be a good way to

start scoping what growth is possible, and where, as phosphorus loading limits are in place for all Lake Simcoe sewage treatment plants. This naturally affects development potential. The province should be coordinating this in the context of the Lake Simcoe Protection Plan review and Phosphorus Reduction Strategy update. In the absence of any announced changes those STP limits of today must be respected. These are all policy requirements of the Growth Plan.

The County cannot proceed to move forward to allocate growth or contemplate any settlement boundary expansions pending completion of the above as to do so would be in non-conformity with the Growth Plan. It is the responsibility of an upper tier to conduct this work and it must await further analysis – including from the lower tiers – and made publicly available for review and comment prior to moving forward.

Technical Study-Specific Comments and Recommendations

Land Needs Assessment - LNA/ELS

Please see Appendix 1 - a report prepared by Kevin Eby that summarizes our response to the LNA.

AGRICULTURAL SYSTEMS MAPPING

- **Refinements to the mapping should result in a net increase of farmland recognized under the Prime Agricultural Land System with a focus on including lands Class 1-6 and keeping connectivity between agricultural systems.**

With climate change risking future food supply and food security, it is imperative that we protect more farmland, Class 1-6, to ensure we not only have land that can produce food, but also to keep secondary businesses and agricultural infrastructure intact. Servicing growth on farmland versus intensification is much more expensive, so not only do we lose the arable land that helps mitigate climate change, we also entrench ourselves with a style of growth that bankrupts communities and reduces food security.

We are losing roughly 175 acres of farmland every day and so the County must do its part to ensure that we protect future food supply.

WATERSHED PLAN

The following recommendations should form a coordinated approach to completing the Watershed Plan and since water is instrumental to public and environmental health, it should be a key lens through which planning decisions should be filtered.

- **The County of Simcoe should abandon the Watershed Plan “equivalent” and instead do a proper, fulsome Watershed Plan.**

We are quite concerned that the County of Simcoe is using an “equivalent” instead of a proper Watershed Plan. There is no definition in regulation for a Watershed Plan Equivalent, but ministry staff has clarified that a Watershed Plan Equivalent must be equivalent, and that partially equivalent is unacceptable. The Simcoe equivalent report has an extensive list of caveats and notations about the absence, limitations, and short-comings of reports and data. This is not even close to what a proper Watershed Plan should include.

- **Fully integrate one of existing watershed plans, Lake Simcoe Protection Plan, into the Watershed Plan.**

Watershed plans for the Lake Simcoe watershed, the Lake Simcoe Protection Plan already exist and thus, should be entirely included. What we do not see in the MCR exercise to date is any integration of the Growth Plan water and wastewater systems policies, or the LSPP’s policies, targets, and principles, in the Simcoe County MCR. Protecting the natural features that are so essential for watershed health should be a priority of the MCR, in line with the Simcoe County Official Plan.

- **Assimilative capacity calculations should inform the LNA, population allocations and lands that are included in the NHS and Agricultural Systems Mapping. No population allocations or settlement boundary expansions should proceed until this information is available and can be analyzed against current LNA calculations.**

Earlier studies including the Intergovernmental Action Plan clearly note the assimilative capacity of the Nottawasaga River has peaked. Similarly, the phosphorus loadings for Lake Simcoe have not yet met their target despite best efforts from the LSPP. Placing growth, without constraints that exist within watersheds, is reckless without shared water resources and our future health.

Climate change will only further exacerbate the decline of our watersheds from increased invasive species, blue-green algae events, droughts, floods, loss of tree cover and increased temperatures. We must be mindful of the environment of the future and plan accordingly.

- **Public health and drinking water should be a priority about where growth goes which requires a fulsome, integrated Watershed Plan.**

Incorporation of the Source Water Protection Plans is critical. As outlined in the climate projection impacts for our region, we can likely expect:

- ❖ shallow wells going dry
- ❖ new sources of water need to be found or lake based intakes lowered to meet current water demand (nevermind future demand)

How is the County of Simcoe's Watershed Plan addressing the future water security of our residents and communities? We have not seen any calculations or even mention of water security or restriction of growth based on water availability, current or future. An equivalent study which reads more like a literature review does not meet the criteria to inform local governments about how to best ensure the future health of our communities.

- **The Nottawasaga River watershed requires more attention and higher level of care/protection to ensure the ecological health of the watershed and its assimilative capacity.**

Targets and general principles of the LSPP can be used in the Nottawasaga which experiences essentially the same stresses as the Lake Simcoe watershed. Previous studies clearly outline that the warming of the river, loss of natural cover, degradation of forested wetlands and reduced assimilative capacity and as such, this is a watershed that required immediate attention and stronger protection.

CLIMATE CHANGE

COP26 has highlighted startling revelations about the health of our planet and the urgency in which all people, all levels of government in all countries need to take swift action and ambitious goals. Although we recognize that future reports are coming that will outline a GHG reduction strategy, there is little awareness or climate action ambition within processes where the County could choose to integrate more climate awareness into the other components of the MCR, most notably the LNA.

Climate science is clear - humans and how we interact with the natural world is the cause of climate change. How we build our communities, where we build them, how we heat them, access them and travel to them all add up to our level of GHG emissions. Car dependent communities contribute a significant amount to our domestic GHG emissions. The goal for net zero emissions coincides with the end goal of this MCR of 2051. If there was ever a chance to do something meaningful to help communities prepare for and mitigate climate change, now is the time.

We hope the future climate change report will clearly outline how our local GHG emissions are influenced by local planning decisions and urgently address the need for healthier, more accessible, more resilient communities. One simple way to help mitigate and adapt to climate change is to protect an adequate amount of wetland and forest and natural cover features. In fact, in these dire times, there is no such thing as too much land under protection.

If the MCR does not result in a development plan that enables a higher percentage of residents to do their daily errands without cars (a massive contributor to local and provincial GHG emissions), then whatever GHG reduction strategy is brought forward will not offset the carbon emissions put in place due to car dependent land use decisions. So far Simcoe County has provided no assurance that this is even being considered.

We believe that in order to have a successful GHG reduction strategy, it should adhere to the following (this is not a comprehensive list).

- **Design a GHG reduction plan that does not revolve around EV adoption as the main vehicle for emissions reduction.**
- **A future GHG reduction strategy requires strong metrics, clear goals and transparent reporting to the public that demonstrates the County appreciates the emergency we are in.**
- **Future consultations about climate planning must make an effort to actively seek out feedback and input from populations that are most impacted by climate change - women, children, elderly, Indigenous people, those living in poverty and people of colour.**
- **A climate action plan needs to recognize that the resiliency of communities and families is key to adapting to climate change. Therefore, efforts should be put towards ensuring people that are most vulnerable to the effects of a changing climate are well supported and that climate actions are a co-benefit to vulnerable communities and their wellbeing.**

NATURAL HERITAGE SYSTEM MAPPING

Natural heritage is a significant element of our water systems, carbon storage, species' habitat and human health. We are gravely concerned about the amount of land that is being removed from the proposed provincial NHS system especially since it is a net loss. The Greenlands policies are not as protective as the Growth Plan's NHS policies and therefore requesting lands be removed from the provincial NHS into Greenlands protection is essentially a policy downgrade and threatens the long term protection of said features. This is especially true for policy protection level of lands in "significant forests", provincially significant wetlands and ANSIs where Greenlands are especially much weaker than that of the provincial NHS policies.

While we will have more specific comments about the NHS refinement by the December 3rd deadline, we offer some general comments and recommendations for your consideration now.

- Refinements of NHS mapping must aim for a **net increase in protected NHS lands under provincial mapping and must capture the entirety of all local PSWs and locally significant wetlands** as this natural infrastructure is integral to climate adaptation and mitigation.
- Special attention must be paid to **increasing natural cover of stream and shoreline areas**, to provide shade and food for native species. To that end no removals of the NHS should occur on streams.
- **Registered plans of subdivision that were not included in settlement area boundaries by July 1, 2017 should remain in the provincial NHS.** If these plans are not contiguous with existing settlement area boundaries there is no justification at this time for their removal from the NHS. There is great concern among residents at Big Bay Point in particular, and on the shore of Oro Medonte, where large areas of High Quality Natural Cover are located, and the extent of the proposed removals from the Natural Heritage System.

Lake Simcoe is a special concern considering climate projections, increased phosphorus loadings, increased blue-green algae events and increased invasive species populations. Therefore, the refinement of the NHS mapping should take consideration of the following points which are aimed at better protecting the lake, conforming with LSPP policy goals and ensuring a healthy watershed into the future.

- These are also goals of the Lake Simcoe Protection Plan. More specifically we recommend these targets:
 - Forest cover: 50% forest cover or more of the watershed is likely to support most potential species, and healthy aquatic systems. *Simcoe County has 22%, but is losing forest cover.*
 - Wetlands: The greater of (a) 10% of each major watershed and 6% of each subwatershed, or (b) 40% of the historic watershed wetland coverage, should be protected and restored, and no net loss of wetlands. Simcoe County has 14% wetland cover based on our analysis, and approximately half of its historic wetland cover. Simcoe County is losing wetlands.
- LSRCA's Natural Heritage System Restoration Strategy, mapping and recommendations must inform the analysis and the mapping refinements. For clarity we support the inclusion of all the LSRCA's recommended areas for an NHS, and we support the inclusion of the LSRCA's recommended areas for restoration in the SC NHS. - find them [here](#)
- The NHS refinement opportunity must result in the protection of all High Quality Natural Cover in the Simcoe County portion of Lake Simcoe watershed. The LSPP's Natural Cover target is 40% The maps have been available on LIO since 2011, and can also be found [here](#) along with the technical guidance for identifying these features [here](#).

- Migration corridors should be prioritized and interrupted corridors should have land added around to create an alternative route for migration
- Simcoe County's NHS mapping didn't capture all of the PSWs or locally significant wetlands but it should. In the Lake Simcoe watershed we know that the MNRF has mapped all wetlands. It is up to the County to now apply appropriate protection.

We appreciate the opportunity to comment on this large undertaking. Since this is such an important process that commits our communities to certain types of development and levels of protection for our water and green spaces, we expect that there will be more fulsome opportunities for public input that meaningfully integrates public feedback prior to decision making.

Considering the climate impacts anticipated in future and the biodiversity loss that is occurring around our region, we cannot afford to rush this process and get it wrong. We strongly urge the County of Simcoe to take time to do the proper studies to fully inform and understand the implications of this process and decisions made therein to our communities financially, socially and environmentally.

Sincerely,

Margaret Prophet
Executive Director, SCGC

Tricia Hulshof
Bradford Women's+ Group

Claire Malcolmson
Executive Director, RLSC

Sandy Buxton
President, Midhurst Ratepayers'
Association

Deborah McGrath
President, Innisfil District Association

Stan Mathewson
President, Sustainable Orillia

George Moore
Simcoe County KAIROS

Mark Bissett
Executive Director, Couchiching
Conservancy

Stephanie Wolfe
New Tecumseth Climate Action

Andrew McCammon
Executive Director, Ontario Headwaters
Institute

Alyssa Wright
Engage Barrie

Don Morgan
Chair, AWARE Simcoe

Susan Hirst
Midland-Penetanguishene Field
Naturalists Club

Paul Cowley
President, FoTTSA

Andy Thomson
Principal, Thomson Architecture Inc.

Mike Douglas
President, Concerned Citizens of
Ramara

Appendix 1 - LNA Comments

Re: Review of the County of Simcoe Draft Land Needs Assessment - Documents Released to Date

DGA and Intensification Targets

Documentation provided by the County includes proposed density and intensification targets for the various lower tier municipalities. For most of these municipalities, the new targets represent increases over the equivalent targets in their current official plans. This is generally a positive step forward, as these targets appear to better reflect future demand in the marketplace and are key inputs into the calculation of the quantum of land required to accommodate growth forecasted for the County to 2051 by the Growth Plan for the Greater Golden Horseshoe (Growth Plan).

Unfortunately, the County has not provided enough information to understand how some of these targets are proposed to be applied or how they figure into the land needs assessment (LNA) calculations.

It is also important to temper expectations around the density increases proposed, as the existing Designated Greenfield Area (DGA) density targets and the proposed Community Area density targets are not directly comparable. They are based on different permitted take-outs from the density calculation as provided for in the 2006 and 2019 Growth Plans. The additional take-outs provided for in the 2019 Growth Plan typically result in an increase of somewhere between 5 and 10 residents and jobs per hectare over densities (for the same development on the same piece of land) calculated using the provisions of the 2006 Growth Plan. As a result, while the County is proposing large increases in the densities applicable to Community Areas, the changes are not as significant as they may first appear.

Another area of concern relates to the almost universal application of a 20 jobs per ha density target for Employment Areas. Only Collingwood and Wasaga Beach are marginally higher at 22. These densities would typically be representative of unserved employment areas dominated by uses such as logistics industries. Consideration should be given to establishment of both serviced and unserved Employment Area density targets reflective of the different forms of employment uses typically associated with such areas. There also is no documented consideration given to employment occurring through intensification of existing uses. This form of development often occurs through additions to existing facilities and should be factored into the calculations.

Compensation for Lower Densities Existing in Already Built Community Area

The Growth Plan requires that DGA density targets apply over the entirety of the DGA net of specific take-outs permitted by Policy 2.2.7.3. This requirement can have unexpected consequences when changing density targets, especially where development in the DGA has occurred at a lower target than is currently proposed.

For example, in Innisfil, vacant Community Area lands and lands in Community Area expansions not only have to attain the proposed density target of 55 residents and jobs per ha, but also potentially must accommodate additional density to compensate for any shortfalls (densities below 55) on Community Area lands developed since 2006 (during which time the applicable density target was 32). As a result, it is not unreasonable to assume that densities in the range of 65 to 70 may be required on the combination of the vacant Community Area lands and any Community Area expansions to meet the proposed overall Community Area density target of 55 in conformity with the provisions of the Growth Plan.

There is, however, nothing in the documentation that explains what density shortfalls would result from application of the proposed 55 density target on the currently built portion of the Innisfil Community Areas. The documentation is also silent as to whether these shortfalls are appropriately made up for on the combination of the vacant Community Area lands and the required 178.3 ha Community Area expansion.

While the above example applies to Innisfil, this concern equally applies to each lower tier municipality with respect to Community Areas. There is no information provided with respect to the already developed Community Area lands and only limited information available applicable to the vacant Community Area (the number of units in planning process and an assumed dwelling unit capacity on vacant lands).

The information provided does not permit a conclusion to be drawn as to whether the proposed Community Area density targets conform to the provisions of the Growth Plan. Similar shortfalls in information exist with respect to Employment Areas.

What are the Identified Shortfalls in Community Area Intended to Accommodate?

There is a lack of information/analysis as to how the shortfalls in Community Area lands were determined. For example, what form/quantum of development would be anticipated to occur in the 178.3 ha shortfall identified in Innisfil?

There is no information provided relating to:

- the number/mix of housing units anticipated within the area of shortfall
- the applicable person per unit factors
- the amount of population related employment anticipated in the expansion area
- whether or not adjustments to the proposed housing mix have been made to utilize excess inventories of other forms of housing where shortfalls in specific unit types (typically in single-/semi-detached units) exist

- whether or not additional dwelling units beyond those required to meet the forecasted population in the Community Areas have been included to meet the proposed density targets

In the absence of this information, there is no way of verifying whether the proposed shortfalls in Community Area (which presumably are intended to justify corresponding expansions), conform to the policies of the Growth Plan.

Housing Mix in Planning Process

Some of the municipal LNA data sheets appear to have errors in them. For example, the “Housing Mix in Planning Process” noted in pink on the data sheet for Innisfil states that 35% of the dwelling units in the “Planning Process” were singles/semis. However, the corresponding data provided elsewhere in the Innisfil LNA data sheet indicates 52% of the dwelling units in the “Planning Process” were singles/semis.

Seven other municipalities (Clearview, Penetanguishene, Springwater, Tay, Wasaga Beach, Bradford West Gwillimbury and New Tecumseth) have similar errors, while the remaining eight appear to be correct or have differences that could simply be related to rounding. In four municipalities, the variance in the percentage singles/semis documented as being in “Planning Process” exceeds the summary number shown in the pink section of the LNA data sheets by 10% or more. In the case of Penetanguishene, the variance is 42% (86% reported in the summary in pink and 44% using the data provided).

Community Area Land Needs / Surplus in the North and South Regional Market Areas

One of the issues with the information distributed is that it is unclear in some cases what it represents, as it is not presented consistently. Summary LNA data sheets forwarded by the County relating to the north and south market areas in some instances contain data that does not match data presented elsewhere.

The Community Area surplus in the northern market area identified in the LNA data sheets is 910.7 ha. The Hemson presentation to the LNA public information sessions identified the surplus Community Area located in the northern market area as 455 ha. No explanation for the differences between these two documents has been provided.

The summary LNA data sheet for the northern market area identifies a shortfall of 174.3 ha in Employment Areas, yet the individual LNA data sheets for the northern market area municipalities identify a cumulative shortfall of only 150.9 ha.

The summary LNA data sheet for the southern market area identifies a shortfall of 707.8 ha in Community Area. This is similar to the cumulative total of the individual LNA data sheets for the southern market area municipalities (which show a shortfall of 701 ha), but not even close to the Community Area shortfall identified in the southern market area in the Hemson presentation

to the LNA public information sessions (a shortfall of 350 ha). Again, no explanation for the differences between these documents has been provided.

It is noted that in the presentations to the LNA Public Information Sessions, Hemson presented numbers for surplus / deficits in Community Areas for the northern and southern market areas that were exactly half of those identified on the corresponding LNA data sheets. It is unclear why this is the case, especially when the corresponding presentation materials relating to surplus / deficits in Employment Areas match the LNA data sheets.

Do Lands Subject to Minister's Zoning Orders (MZOs) Count as DGA?

In an email dated October 5, 2021, Dan Amadio of the County of Simcoe confirmed that "Approved MZO's **will now** be accounted for in the supply" [emphasis added]. This is similar to an answer provided by Hemson in the second LNA public information session, but it remains unclear what impact it has on the need for both Community Area and Employment Area expansions.

For example, does all or some of the area constituting the Orbit MZO count as Community Area lands? If it does count, it is not clear if the numbers presented in the data sheets or at the LNA public information sessions remain valid. If the Orbit is not included in the assumptions used to prepare the data sheet for Innisfil, conceivably a substantial change will be required both to Innisfil and the southern market area assumptions.

Confusion relating to MZOs further complicates an already complicated process. In the absence of data properly incorporating the MZOs, the resulting information void makes it impossible for members of the public to provide informed comment on the proposed LNA.

Potential for Conversion of Excess Community Area lands in the Northern Market Area to Employment Area

One of the policy requirements of the Growth Plan is to address excess lands. Excess lands are lands that are currently designated for urban development beyond the amount of land required to accommodate forecasted growth within the planning horizon. It is assumed the reason market areas were established was to permit a shortfall in Community Area within the southern market area to be addressed through expansions, despite there being an excess of Community Area in the northern market area. These excess Community Area lands in the northern market area will either need to be addressed in accordance with the policies of the Growth Plan or potentially be considered for conversion to meet the shortfall of employment land there. There is no indication in the materials provided to the public to date as to how the issue of excess lands will be addressed.

Summary

The proposed increases in the intensification and Community Area density targets appear to be a positive step forward, but it is impossible to fully understand the impact of the changes proposed

or even whether such proposed changes conform to the provisions of the Growth Plan because of the lack of supporting information provided.

Until such time as the public has an opportunity to review the foundational background material, it is impossible to provide informed comment related to the draft LNA to the County of Simcoe. In response to a query about this issue, Mr. Amadio replied:

“Attached is some additional information [the summary LNA data sheets for the northern and southern market areas] which may assist with your ongoing review. Otherwise, our process will be to release the LNA report which will include details that further articulate the approach and recommendations.

You’ll have time to review the details in that report since no decision to adopt the OPA will be made by County Council on this matter until after a public meeting is held in the spring. We expect that report may be available toward the end of this year or very early into the new year. Notification will be provided once available.

It appears early in the new year will be the earliest you can expect any additional information.

Kevin Eby, RPP
Eby Growth Management Planning Services Ltd.
kevineby@rogers.com