



---

## MEMORANDUM

FROM: County of Simcoe Planning Department

TO: County Council, Local Municipal CAO's, and Local Municipal Planning Directors

DATE: December 21, 2021

SUBJECT: Follow-up to Matters Raised at the Special County Meeting on the Municipal Comprehensive Review held December 9, 2021

---

This Memorandum has been prepared to respond to the comments and questions raised at the Special County Meeting for the Municipal Comprehensive Review (MCR) held December 9, 2021.

The comments below have been grouped under the various components/studies of the MCR for ease of reference.

### **Land Needs Assessment (LNA) and Growth Management**

The MCR is a technical planning exercise which is required by the Province to bring the County of Simcoe's Official Plan into conformity with *A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020* (Growth Plan) that took effect August 28, 2020.

The MCR is not a "visioning" exercise. It will be the local municipalities that determine the appropriate housing mix and neighbourhood design within the settlement areas through local planning policy. The work to determine how communities look and feel, including the spatial arrangement of buildings, roads, and public open space, and the location and configuration of new development will flow from the MCR. However, that work will continue to primarily remain within the hands of local municipalities.

The minimum population and employment for the County to 2051 was established by the province through Schedule 3 of the Growth Plan. The LNA is a technical exercise to be completed in accordance with a provincially prescribed methodology that will determine the broad distribution of growth across the County over the long-term. This is to be done in accordance with the policy direction provided by the Growth Plan, including the requirement that a significant portion of the growth be directed to several primary settlement areas (Alcona, Bradford, Alliston, Collingwood, and Midland/Penetanguishene). The growth distribution must also recognize the historical patterns of settlements in Simcoe, as well as good planning principles that, among other things, promote "complete" communities where people can live, work, shop, and play. A key component of a complete community is the opportunity to use transit as an alternative mode of transportation.

Through the LNA, the County must also establish minimum density and intensification targets. Density and intensification targets will only be assigned to those municipalities with settlement areas having a provincially delineated built-up area.

---

- Density targets apply to the designated greenfield areas within settlement areas having a delineated built-up area.
- Intensification targets are the minimum percentage of all residential development occurring annually within the delineated built-up area.

Based on the growth distribution, and the minimum density and intensification targets, the LNA is used to determine any land needs required to expand settlement area boundaries to accommodate future growth to the 2051 planning horizon of the Growth Plan. Preliminary LNA results show that the vast majority of municipalities will not require settlement area boundary expansions.

There have been many questions from Council, and throughout the MCR public consultation process, about the ability of local municipalities to provide municipal water and wastewater services for the forecast growth. The County has engaged R.V. Anderson Associates, an engineering firm specializing in municipal servicing systems analysis, who are currently completing a “Water & Wastewater Services Delivery Review” on behalf of County Council’s Regional Governance Review Task Force, to provide comments on the potential for future growth given the current and future servicing infrastructure opportunities and challenges. These comments will be considered in preparing final LNA growth allocations.

### **Settlement Boundary Expansions**

For any municipalities that may need to expand a settlement, the decision on where that expansion is most appropriate will be based on an evaluation process, which will be conducted collaboratively by the local municipalities and the County. It will be County Council’s responsibility to adopt any settlement boundary expansion as a County Official Plan Amendment. As is the case with all aspects of the MCR, the final decision with regard to amendments to the County Official Plan rests with the Province.

It is important to note that prior to any settlement area expansion being considered by the County, the local municipalities will need to demonstrate that there is sufficient capacity in existing or planned infrastructure and public service facilities. In addition, local municipalities will need to review and consider the impacts of settlement area expansions on natural heritage, the Natural Heritage System for the Growth Plan and prime agricultural areas in the consideration of expansion options.

If certain municipalities do grow faster than anticipated by the MCR, the current draft land budget shows that there is existing opportunity within most municipalities’ settlement areas (with the exception of BWG, Essa, Innisfil, New Tecumseth), to keep developing up to the year 2051 without the need to add more land.

If in time it is determined that the 2051 population and employment allocation numbers assigned to each local municipality through the MCR are in fact too low due to greater growth occurring than anticipated by the MCR, development does not need to stop. Growth may still occur on urban designated lands (i.e. not Rural or Agricultural designations) within settlement areas and on draft approved subdivision or condominium lands, even if the related population exceeds the County assigned 2051 municipal allocation numbers.

The MCR population allocation will also not prevent existing lots of record that are appropriately zoned for residential uses outside of the settlement areas from being developed for that purpose, even if that related population growth results in an exceedance in the overall 2051 population allocation. However, it is noted that development on existing vacant lots of record outside of settlement areas and shoreline areas may be precluded if the entirety of the lot is within a key feature within the Natural Heritage System for the Growth Plan or within a key hydrological feature outside of settlement areas.

---

As per Growth Plan Section 5.2.7.1, the Minister will be reviewing the Schedules to the Plan at least every 5 years in consultation with municipalities and may revise the Schedules where appropriate. This review would be an opportunity for the County and its local municipalities to re-evaluate the Schedule 3 growth allocations for Simcoe and make recommendations regarding any necessary adjustments to address an occurrence where there may be an underestimate, or overestimate of growth.

As the County is currently going through a conformity exercise and is not preparing a “new official plan,” we will need to review our Official Plan 5 years after the conclusion of the current MCR/OP update exercise, to consider any updates that may be required. If at that 5-year review interval it is determined that an update is necessary, then that means we anticipate our first opportunity to make additional revisions would begin in 2027 at the earliest. At that time, we would have an opportunity to re-evaluate and adjust the specific local municipal population and employment allocations that are currently being considered for inclusion in the County OP as part of the 2021/2022 MCR exercise, to “course correct” as required.

A northern and southern regional market area was established for the LNA exercise in order to address two key challenges unique to the County of Simcoe:

1. This framework enables lands to be added to settlement areas in the south that have a shortage of land to meet 2051 growth requirements. A surplus of overall lands in the north would actually prevent appropriate growth from occurring on needed lands for certain areas in the south in the absence of this approach.
2. The framework also prevents some municipalities in the north from having to “down-designate” properties in their settlements by identifying them as “excess lands”. A single overall County market area would result in some municipalities in the north needing to identify lands presently designated for future growth (potentially including lands under application), as “excess lands” to enable the designation of additional lands adjacent to the primary settlement areas in the south. This would essentially remove their development rights – a process that would pose considerable challenges.

As a result, the development of northern and southern regional market areas offers positive benefits to all areas of the County, and was not set up for the exclusive benefit of one particular area. County staff have consulted staff of the Ministry of Municipal Affairs and Housing on the approach.

It is recognized that there are more lands designated for residential development within settlement areas in the northern regional market area than needed. There are no plans as part of the MCR to identify any lands as excess lands. Such a process would be very complicated, potentially divisive and would very much detract from the overall goal of the MCR, which is to move forward and plan for expected growth. Also – eliminating excess lands will only serve to further limit choice in the market place and in settlement areas where the Growth Plan says growth should be directed. Notwithstanding the above, local municipalities are encouraged to develop phasing policies to ensure growth occurs in a logical manner.

County Planning Staff and the MCR consulting team are not considering reducing the number of settlement areas. There are currently 93 settlement areas throughout the County and that will not change. As well, the County is prohibited by the Growth Plan from creating new settlement areas.

The Growth Plan requires the County to establish a Hierarchy of Settlement Areas to classify each of the settlements as either a Primary Settlement Area, Settlement Area, or Rural Settlement, as defined in the Growth Plan. Local Planning Departments have been involved in this process and have commented on preliminary classifications of each settlement area.

---

## **Provincial Natural Heritage System Map Implementation and Refinement**

The first draft of the refined mapping of the Provincial Natural Heritage System (NHS) was posted to the County's MCR webpage and made available to the local municipalities and the public for review on October 27, 2021.

The Provincial NHS mapping does not apply to lands within settlement area boundaries. As a result, the implementation of this Provincial NHS mapping will have no direct impact on the municipalities of Collingwood, Wasaga Beach, Midland, and Penetanguishene.

If there are currently areas mapped as Provincial NHS within a settlement area it is an error, and will be removed through the mapping refinement process. Local municipalities will continue to map natural heritage areas within settlements in their own Official Plans, as they always have.

Although new agricultural and other buildings cannot be built within key natural heritage features (e.g. significant woodlands) that fall within the Provincial NHS, and all key hydrologic features (e.g. wetlands) outside of settlement areas many of these areas are already subject to restrictive policies. In addition to the above, new buildings would be permitted in vegetation protection zones subject to meeting a series of criteria. Lastly, existing agricultural uses will be permitted to continue as is current practice.

The County is proposing to remove registered plans of subdivision (M-plans) that are outside of settlement areas from the Provincial NHS. In addition, the Growth Plan does permit shoreline development in areas that are zoned for such as of July 1, 2017.

The County Official Plan Greenlands land use designation is not being assessed through the MCR exercise and will remain as is. Local municipal natural heritage systems will also not be affected by the MCR. The provincial NHS will be an additional layer, an overlay, to identify where provincial NHS policies are applicable.

The existence of the provincial NHS adjacent to a settlement area that has been identified for expansion will not prevent the expansion from occurring, however, expansions into the NHS should be avoided where possible.

## **Provincial Agricultural System Map Implementation and Refinement**

The refined provincial Agricultural System mapping will not extend within settlement area boundaries. If there are currently areas mapped as prime agricultural area within a settlement area it is an error in the Province's mapping, and will be removed through the mapping refinement process of the MCR.

The first draft of the refined provincial Agricultural System mapping is expected to be ready for release in mid-late January 2022. Local municipalities and the public will have at least four (4) weeks to review and comment on the mapping.

When implemented, the provincial Agricultural System mapping will represent the prime agricultural area of the County. This mapping will reflect the updated agricultural land use designation within the County and local official plans.

The existence of the provincial Agricultural System adjacent to a settlement area that has been identified for expansion will not prevent the expansion from occurring, however, expansions into the prime agricultural area should be avoided where possible.

---