

DORSAY

DEVELOPMENT CORPORATION

February 28, 2019

Sent via email: growthplanning@ontario.ca

Mr. Charles O'Hara
Director, Growth Policy, Planning and Analysis
Ontario Growth Secretariat
Ministry of Municipal Affairs
777 Bay Street
c/o Business Management Division, 17th Floor
Toronto, ON M5G 2E5

Dear Mr. O'Hara

RE: Comments on Amendment 1 to the Growth Plan (the "Amendment")
EBR Registry Number: 013-4504
DIV Development (Barrie) Ltd.

DIV Development (Barrie) Ltd. ("DIV"), are the owners of approximately 80 hectares of land located north of Lockhart Road and west of Sideroad 20 ("Subject Lands"), within the Hewitt's Secondary Plan ("HSP") in the City of Barrie.

The Subject Lands are located entirely within the HSP however a majority of the lands are located outside of the settlement boundary, as defined by the City of Barrie Official Plan.

We thank the Province for putting forward the Amendment and for this opportunity to provide our comments. We support the Province's initiative and commitment to increasing available housing supply, streamlining the process for transit growth, attracting investment and fostering job creation, and improving the planning process, while continuing to protect the Greenbelt, agricultural lands, the agri-food sector, and natural heritage systems in Ontario.

We have reviewed the proposed Amendment 1 to the Growth Plan ("Amendment 1") in the context of the Subject Lands and we have the following comments/requests:

- Amendment 1 should be updated to include transition policies or other means of exemption to allow for the achievement of complete communities which have been envisioned through the original planning processes and studies conducted so far;
- Settlement area boundary expansions occurring outside of a municipal comprehensive review ("MCR") should be allowed on the basis of achieving complete communities rather than an arbitrary size limitation;
- The requirement to follow the previous government's Land Needs Methodology should be removed or put on hold until a new Methodology is prepared; and
- Clarification should be added with respect to the proper function of the Schedule 3 numbers as forecasts that should not be treated as maximums or caps.

History of DIV Lands

DIV actively participated in the planning process leading up to the adoption of OPA 38 (Salem Secondary Plan) OPA 39 (Hewitt's Secondary Plan) and OPA 40 (Growth Management). On behalf of DIV, Davies Howe Partners LLP filed multiple submissions, which identified our concerns about the Settlement Area Boundary and other growth management matters. Through these submissions, DIV consistently put forward its position that the Subject Lands should be included within the 2031 Settlement Area boundary in order to provide for the logical development of complete communities and ensure the efficient and cost-effective expansion of servicing and transportation infrastructure.

Although the adopted HSP did not include the Subject Lands in the Settlement Area, through the appeal process, the former Ontario Municipal Board determined that additional land was required to accommodate growth to the 2031 horizon, and as such, adjusted the boundary to include a portion of the Subject Lands. It should be noted that through the background work to prepare the HSP (Annexed Land: Background and Options Report), the entirety of the Subject Lands was considered for development; however, prior to the adoption of the OPAs to implement this work, new population and employment forecasts were released causing the City to reduce the Settlement Area boundary within the HSP.

Comments on the Amendment 1

We have reviewed the proposed Amendment 1 and have the following comments:

- Given the full planning process which was initially completed by the City for the HSP and which justified the inclusion of the Subject Lands to achieve a complete community, it would be appropriate to include transition policies or another mechanism to exempt the HSP from the population and employment forecasts to allow for the Subject Lands to be added to the settlement area and the HSP completed on the basis of that work.
- We support the proposed new Policy 2.2.8.5 which allows for settlement area boundary expansions to occur outside of an MCR, but recommend that it be linked to achieving complete communities instead of limiting the expansion to 40 hectares.

The Subject Lands are an excellent example of how this new Policy 2.2.8.5 could be used to achieve the Province's objective of unlocking land more quickly to meet needs for housing and job creation. The Subject Lands can be serviced with minimal infrastructure investment, are adjacent to the existing urban area, would produce minimal interface between urban and agricultural uses and would avoid natural heritage features. The inclusion of the Subject Lands in the Settlement Area Boundary in the HSP will contribute to the creation of complete neighbourhoods.

- To recognize the reality of infrastructure planning and implementation, we propose that Policies 2.2.8.4 and 2.2.8.5 be revised so that settlement boundary adjustments and expansions may be permitted where it can be demonstrated that servicing can be extended to lands within the planning horizon, rather than requiring that sufficient reserve capacity already be available.
- In assessing land needs at the MCR stage, policy 2.2.1.5 continues to require that the need be assessed in accordance with the Lands Needs Methodology released under the previous government. We have identified significant flaws with this Methodology. The requirement to follow the Land Needs Methodology should be removed until a new, more appropriate and realistic Land Needs Methodology is prepared.

- Clarification should be added to the Growth Plan to indicate that the population and employment growth forecasts in Schedule 3 are forecasts that municipalities should plan for and strive to achieve but they are not maximums or caps, which serve to limit or restrict growth that is needed to meet market demand. The proper function of these forecasts should be expressly recognized in the Growth Plan.

Conclusion

In conclusion, DIV is making the following comments/requests on the proposed Amendment 1 to the Growth Plan:

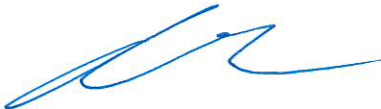
- Amendment 1 should be updated to include transition policies or other means of exemption to allow for the achievement of complete communities which have been envisioned through the original planning processes and studies conducted so far;
- Settlement Area boundary expansions occurring outside of an MCR should be allowed on the basis of achieving complete communities rather than an arbitrary size limitation.
- The requirement to follow the previous government's Land Needs Methodology should be removed or put on hold until a new Methodology is prepared; and
- Clarification should be added with respect to the proper function of the Schedule 3 numbers as forecasts that should not be treated as maximums or caps.

We thank you for the opportunity to provide input on the proposed changes to the Growth Plan and look forward to working with you and your staff. We would appreciate being added to the circulation list for any new information with respect to proposed Amendment 1 as it arises.

If you have any questions, or would like to meet to discuss the contents of this letter, please do not hesitate to contact me.

Regards,

DIV Development (Barrie) Ltd.



Geoffrey Grayhurst, President