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July 30, 2020

Sandra Bickford  
Ontario Growth Secretariat  
777 Bay St, Suite 2304  
Toronto, ON  
M7A 2J8  
Canada

**RE: County of Simcoe Comments on Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe and Proposed Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe ERO No. 019-1680 and 019-1679**

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Thank you for the opportunity to provide comment on the proposed Amendment 1 to a Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019). We understand that the proposed policies, as posted on June 16, 2020, are intended to provide more flexibility and foresight to municipalities in planning for demographic, economic, and affordable housing trends. The County of Simcoe is generally thankful for the changes that are proposed. Many of the changes being proposed address the needs of the County of Simcoe and its member municipalities.

This letter provides a summary of the County's comments and suggestions related to the proposed revisions to the Growth Plan 2019 document.

The proposed changes to the Growth Plan 2019 are addressed in the following key issues:

1. Indigenous Community Engagement Updates
2. Removal of Schedule 7
3. Growth Forecast to 2051
4. High, Reference and Low Growth Forecasts
5. Land Needs Assessment Methodology Update (ERO-019-1679)
6. MCR Completion Deadline
7. Update to Aggregate Operations Restrictions in the Natural Heritage System

### **1. Indigenous Community Engagement Updates**

**Changes:** New language has been added in Section 5.2.3.4 "*Municipalities shall engage Indigenous communities in local efforts to implement this Plan, and to provide the necessary information to ensure the informed involvement of these communities.*" The language of Section 5.2.3.7 has replaced "are encouraged to" with "*Planning authorities shall co-ordinate planning matters with Indigenous communities throughout the planning process to ensure that appropriate engagement is undertaken*"

**Comments:** County staff recognize that the focus is on engagement, however, we are concerned with this change as municipalities are not legally obligated to consult. While it is our intention to work with Indigenous communities to the greatest extent possible, the ultimate legal responsibility to meet the duty to consult lies with the Crown (Province). The County has been advised by various Indigenous

communities in the area that they do not have the staff or financial supports to keep up with the workload generated by the 1000's of municipal circulations and consultation requests they receive on an annual basis. To address this issue, the County requests that the Province significantly increase the capacity funding being provided to Indigenous communities to allow for effective and meaningful engagement and consultation to occur. We further request that the Province provide guidance by outlining which groups of Indigenous people should be consulted and when/how this consultation must take place.

## **2. Removal of Schedule 7**

**Changes:** Schedule 7 is proposed to be deleted in its entirety. Policies 5.2.4.6, 6.1, 6.2.1 and 6.5.2 have been revised to remove references to Schedule 7.

**Comments:** The County's 16 lower-tier municipalities are in varying stages of updating their Official Plans to conform with the Simcoe County Official Plan (2016), which includes the population and employment allocations to 2031 from Schedule 7 of the Growth Plan. County staff feel it is beneficial to continue planning to 2031 using the population and employment forecasts to 2031. The County proposes that Schedule 7 remain as a Schedule in the Growth Plan until the County completes the municipal comprehensive review.

Despite the proposed removal of Schedule 7, some of the mock Schedule 3 forecasts propose to maintain the growth allocations to 2031 for all upper- and single tier municipalities. If Schedule 7 is removed, the County requests that the mock Schedule 3 forecast that is chosen include the 2031 growth allocations. Further, County staff request clarification of whether our 16 lower-tier municipalities should continue to plan for the growth allocations to 2031 if the mock Schedule 3 forecast is chosen that does not include the 2031 growth allocation numbers.

## **3. High, Reference and Low Forecasts**

**Changes:** Three possible population and employment forecasts have been proposed including a high, reference and low forecast. A further option is proposed to either include 2031, 2041 and 2051 forecasts or to only include the forecast to 2051. Updated Policy 2.2.1.1 indicates that the forecasts represent minimum allocations and an upper or single-tier municipality may, through its municipal comprehensive review, establish higher forecasts.

**Comments:** County staff prefer the reference forecast that includes 2031, 2041 and 2051 employment and population growth allocations. County staff recommend a cautious use of the proposed high forecast to avoid the potential for it to increase development pressures of greenfield areas in Simcoe County by creating easier justification to develop greenfield lands. Utilizing the high forecast as a minimum threshold may lead to unnecessary expansions of existing Settlement Areas and contribute to urban sprawl. If the high forecast is chosen, it should be accompanied by direction that lands brought into Settlement Areas as a result of 2051 growth allocation numbers can be designated for growth in a phased manner.

Use of the reference forecast is also acceptable from County staff's perspective, understanding that the targets are a minimum. Should a municipality require additional population or employment growth allocation they have the ability to secure this via appropriate justification through a MCR.

Since the forecasts are minimums, it is suggested that if a municipality does seek to pursue higher forecasts as established through a MCR (Policy Section 5.2.4), that direction is provided as to what would be the appropriate circumstances to grant a higher forecast. For example, a unique opportunity to align growth in conjunction with infrastructure is proposed in the Town of Innisfil relating to their Orbit community, which are the lands at 6th Line and east of 20th Sideroad that surround the future GO Transit station. In order for the Orbit to proceed without compromising the growth aspirations of the balance of the municipalities throughout the County, it would be very beneficial to utilize the MCR to enable

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population allocation to the Town to accommodate the Orbit above and beyond the allocation necessary for the growth of the rest of the municipality.

#### **4. Growth Forecast to 2051**

**Changes:** Schedule 3 is proposed to be updated to include growth forecasts to 2051.

**Comments:** County staff are in support of this change. County staff prefer the reference forecast that includes 2031, 2041 and 2051 employment and population growth allocations.

#### **5. Land Needs Assessment Methodology (ERO-019-1679)**

**Changes:** A new methodology is being proposed to assess land requirements for the accommodation of population and employment allocation.

**Comments:** County staff would like to take this opportunity to reiterate that a methodology which is streamlined and efficient is critically important to the completion of the MCR in a timely fashion. Using a methodology that is flexible enough to be used by Outer Ring municipalities so that it can be tailored to our needs and smaller growth relative to the Inner Ring would be a supportable approach.

#### **6. MCR Deadline for Completion**

**Comment:** Despite all of the recent changes to the MCR process and uncertainty relating to how the program would be implemented, the Province has chosen to keep the deadline constant and require completion for the upper and single-tier municipalities by July 1, 2022.

It is recommended that an extension be considered for the completion of the MCR. Alternatively, an option should be provided for municipalities to request an extension to this completion deadline if necessary. A decision on whether or not to grant such an extension could then be considered by the Ministry and decision made at the discretion of the Minister.

#### **7. Update to Restrictions on Aggregate Operations in the Natural Heritage System**

**Change:** Section 4.2.8.2 is proposed to be amended to remove the prohibition of new mineral aggregate operations and new wayside pits and quarries, or any ancillary or accessory use thereto, to locate within habitat of endangered species and threatened species.

**Comment:** County planning staff request that further information be provided to provide background and justification for this policy change. We are particularly interested in how the policy is to be interpreted in the context of other provincial policy documents and the related *Aggregate Resource Act* process.

The County would encourage further review of the above-noted sections and seek assistance interpreting the updated policies through more clearly defined policies and streamlined regulations.

If you have any questions or require further information with respect to this correspondence, please do not hesitate to contact the undersigned at 705-726-9300 Ext.1004 or [david.parks@simcoe.ca](mailto:david.parks@simcoe.ca).

Sincerely,

**The Corporation of the County of Simcoe**



David Parks, MCIP RPP

Director of Planning, Economic Development and Transit

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cc: Debbie Korolnek, General Manager, Engineering, Planning and Environment – County of Simcoe

