

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

May 25, 2023

RE: Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument (ERO 019-6813) - Comments Southeast Corner of Shore Acres Drive and 20th Sideroad, Town of Innisfil

Weston Consulting is the Planner for the West family, the owner of the lands located at the southeast corner of Shore Acres Drive and 20th Sideroad in the Town of Innisfil (herein referred to as the “subject lands”). The subject lands are located directly outside of the Gilford Settlement Area Boundary. The purpose of this letter is to provide a formal submission of comments as it pertains to the newly proposed policy directions for Settlement Area Boundary Expansions (SABE) as outlined in the proposed Provincial Planning Statement (PPS) (ERO 019-6813).

The Ministry of Municipal Affairs and Housing (MMAH) is consulting on proposed policies for an integrated province-wide land use policy document, the PPS, issued under the *Planning Act*. Policy changes under the proposed PPS include modifications to the SABE policies. The proposed changes to the SABE policies are intended to provide a simplified and flexible approach for municipalities to undertake SABE requests. Specifically, municipalities would be allowed to create new Settlement Areas outside of the Municipal Comprehensive Review (MCR) process as the concept of an MCR has not been carried forward in the proposed PPS. Other key changes include that municipalities would no longer be required to demonstrate the need for an expansion and the criteria associated with justifying an expansion has been scaled back overall. Also, the need to “demonstrate” that criteria have been met has been scaled back to now providing “consideration” for the criteria. We are in support of these overall changes as it will assist in increasing the supply of land that is suitable for development.

Policy 2.3.4 of the proposed PPS states that:

In identifying a new settlement area or allowing a new boundary expansion to happen, planning authorities should consider the following:

- a) that there is sufficient capacity in existing or planned infrastructure and public service facilities;*
- b) the applicable lands do not comprise specialty crop areas;*
- c) the new or expanded settlement area complies with the minimum distance separation formulae;*
- d) impacts on agricultural lands and operations which are adjacent or close to the settlement area are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and*
- e) the new or expanded settlement area provides for the phased progression of urban development.*

The subject lands are located directly adjacent to the Gilford Settlement Area Boundary and are considered under the proposed, but not yet approved County of Simcoe Official Plan Amendment No. 7 (OPA 7), to be located in a Category 4 – Rural Settlement Area. Based on the subject land’s geographic relationship to the existing Settlement Area Boundary, they would allow for a phased progression of urban development and have

the capacity for water and private septic servicing. A minor boundary expansion to include the subject lands would represent a logical continuation of expansion and completion to the existing Settlement Area Boundary. The proposed SABE policy changes provide an opportunity for a more granular review, at a local level, for geographically appropriate and logical expansions to be considered and the reduced set of criteria may provide increased support for small expansions such as what is being proposed for the subject lands.

There is one comment we would like to raise about Policy 2.3.4, specifically sub-section a). It is our opinion that greater flexibility in Policy 2.3.4 a) is warranted to support servicing capacity more generally, ensuring that lands that can be serviced privately are captured and not excluded. In settlement areas, such as Gilford, private servicing is a common and appropriate option given the local context. There are many recent applications in Gilford that support this type of servicing and SABE requests should not be denied based on this factor alone.

Weston Consulting, on behalf of the landowner, has previously submitted a letter in support of the inclusion of the subject lands within the Gilford Settlement Area as part of Simcoe County's MCR process. In addition, comments have been provided on the County of Simcoe's OPA 7, including comments related to servicing. These requests have been received by Staff and the MMAH, but no responses have been provided yet.

In our opinion, as it pertains to the subject lands and the overall objective of the proposed SABE policies, we support the direction the Province of Ontario is moving towards to simplify and minimize the review time required for requests such as these. The proposed PPS also allows for the increased flexibility for growth in municipalities through a streamlined and efficient process, allowing municipalities to uphold the intent behind the policies and ensure more support is given to appropriate sites that may be overlooked during an MCR process.

We thank you for the opportunity to provide these comments. Should you have any questions, please contact the undersigned.

Yours truly,

Weston Consulting

Per:



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Associate