

# TAY TOWNSHIP

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**February 26, 2019**

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**Sent via email (Charles.o'hara@ontario.ca)**

**Subject: Comments** *ERO# 013-4504 - Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017, ERO #013-4507 Proposed Modification for Natural Heritage System and Agricultural System Mapping*

I am pleased to submit the following comments and questions with regard to the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017.

## **Employment Planning**

- These proposed policies would allow Tay to remove lands out of the employment inventory, provided we maintain the required amount as outlined in the PTG. Lands designated for employment presently are not permitted to be removed from the inventory unless done so through the completion of a MCR, which can only be completed by the County of Simcoe.
- This is particularly important as we do have limited industrial lands within the Township, and once non-employment uses begin to be added to those areas, it could have the effect of "chipping away" at the industrial land base. However, limiting existing industrial parks may not always be appropriate, as there has been a shift from traditional manufacturing/processing to smaller scale and non-manufacturing type uses, which could be quasi-industrial/commercial.

- Planning staff support the modified language as an appropriate interface to maintain land use compatibility between employment areas and non-employment areas. This provides further direction to establish strong planning principals that provide for an effective transition between employment uses to those that may not be compatible. By having transition policies in place for employment areas and non-employment areas, it would allow for the employment uses to operate and expand, without being impacted by potentially sensitive land uses in adjacent areas.
- The Provincially Significant Employment Zones (PSEZ) that the Province has identified only has one within the Simcoe County area. One items that Planning staff are questioning is that why would the City of Barrie, which is an Urban Growth Centre and the Primary Settlement Areas of the City of Orillia, Towns of Midland/Penetanguishene, Collingwood, Bradford West-Gwillimbury not be included in the PSEZ identification.
- There is also the Bradford West-Gwillimbury Strategic Settlement Employment Area, Innisfil Heights Strategic Settlement Employment Area, Lake Simcoe, Regional Airport Economic Employment District and Rama Road Economic Employment District. Why have these areas not been considered to be a PSEZ?
- Township staff support the proposed policy of conversion of PSEZ lands can only occur through an MCR process.

### **Settlement Area Boundary Expansions**

Staff support the proposed changes to the settlement area boundary expansion policies are positive, and provides the Township the flexibility to adjust or expand the boundary of any Settlement Area in an appropriate manner ahead of the County completing an MCR.

- The Province needs to provide a clear indication as to what the term "rounding out" means.
- The intent of the proposed changes is to be minor in nature, so that small scale boundary adjustments/expansions can occur.
- Is net increase in settlement area land across all settlement areas total, or each individual one?
- Clarification is required to the 40 hectare expansion provisions that is this a one-time occurrence, if so when can the next one occur?
- Can the 40 hectares be applied across multiple settlement areas? Can land be taken from one settlement area and applied it to another?
- Does the Upper Tier remain the approval authority if this is completed outside of the MCR process?
- Should an expansion be required it should remain a municipally driven process and not a privately initiated one.

## **Rural Settlements**

Staff support these proposed rural settlement policies as it enables the Township to make decisions on "minor rounding out" of rural settlement areas, so long as it is in keeping with the rural character.

- Should the Township require the "rounding out" or "squaring off" of any settlement area boundary these policies would provide the flexibility to do so.
- Does this rounding out only apply to rural settlements or other settlements that are fully serviced?
- A clear definition of rounding out needs to be provided, and the suggestion could be to eliminate single sided roads, which have occurred through strip development. If there are natural features (watercourse) those could be used as the limits.
- It is also supported that these settlement areas would not form part of the designated Greenfield areas.

## **Agricultural and Natural Heritage Systems (NHS)**

While Staff supports the flexibility of the proposed modification to the NHS and the Agricultural System policies, it would be our recommendation that this mapping be removed completely from the Growth Plan. The Township and the County of Simcoe have sufficient local knowledge which has transitioned into strong policies being put into our respective Official Plans that protect natural features and agricultural lands.

These policies and mappings that are currently part of the Growth Plan have provided the most challenging for day to day operations in reviewing development inquires. The existing mapping was put into place by the previous Provincial government with no boots on the ground discussions with the upper and/or lower tiers. The Majority of the Township on the south side Highway 12 falls into either one of these mapping systems. While Planning staff do support the intent of the proposed changes, as it has been causing numerous issues with potential development of residential, commercial and industrial lots in getting shovels into the ground. It remains the recommendation of the Township that the mapping and policy of the NHS and Agricultural System be kept at the local level and not be part of the Growth Plan.

The Township has significant Employment Lands that are presently designated and zoned for industrial and commercial uses, but are essentially useless as they are entirely within NHS mapping. These lands are strategically located adjacent to Highway 400 and Highway 12, but remain vacant due to

the policies of the Growth Plan as it relates to the NHS. How does the Province expect rural communities such as Tay to achieve employment numbers and "Be Open of Business", when there are environmental mapping errors and additional red tape for businesses to go through.

The buffer areas to the feature needs to be reviewed as we are finding that smaller development applications such as not able to proceed due to the NHS policies. For example the Township at this present time has a Minor Variance application for a kennel operation to expand, which includes the addition of a fenced in area dog run. The applicant requires a minor variance for this item, however the NHS mapping is prohibiting expansion as the fenced in area is within the buffer area of a woodlot feature. There is no removal of trees but simply placing a fence on the property to help the business expand. This is one example of many that the Township is dealing with on a day to day basis, with the difficulties of the NHS and agricultural system mapping being done at the Provincial level.

### **Intensification and Density Targets**

In the context of Tay, the County Official Plan has an existing alternative density target of 32 residents and jobs per hectare, and an intensification target of 20%, which is a more in a realistic target for Tay to strive to achieve.

A change from 32 residents and jobs per hectare to 40 would still have its challenges, but with alternative types of built form such as townhouses and apartments being constructed, this target may be achievable. It would be the recommendation of Planning staff that the existing intensification target of 32 residents and jobs per hectare in the County Official Plan be maintained for the Township moving forward to the Planning horizon of 2031.

The average County wide density target is 39 residents and jobs per hectare and an average intensification target of 32% as shown in the County Official Plan.

If intensification targets are too high, it could have the potential to change the rural character of the Township and have an impact on the feasibility to provide servicing and other infrastructure needs. The Planning Department supports the Province's proposal to provide various intensification targets across the Growth Plan area and not implement a "one-size fit all" approach, as this is not reflective of the character of rural municipalities in Ontario; however, the Township would be working with the County of Simcoe through

in and outside of the MCR process to ensure that the appropriate targets are achieved, and that if alternative targets are required they are justified.

### **Municipal Comprehensive Review Process**

It is important to note that the MCR process remains the same as under the Growth Plan 2017, with respect to it still being an upper-tier process that is initiated by the County of Simcoe, with input from the lower-tiers. Planning and Development staff support the proposed modifications to the Growth Plan that provides the Township with the flexibility to complete minor boundary adjustments/expansions, employment land conversions or refinements to the NHS and Agricultural System mapping ahead of the MCR. By having these proposed changes it could have the impact of speeding up the MCR process for the County. It is not anticipated that these proposed changes to the MCR policies would have any adverse impacts on the MCR process.

If you have any further questions, please contact me at (705) 594- 7248 Ext. 225 or by email at [sfarquharson@tay.ca](mailto:sfarquharson@tay.ca)

Sincerely,  
The Corporation of the Township of Tay



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