

February 20, 2019

Charles O'Hara, Director
Ministry of Municipal Affairs and Housing
Ontario Growth Secretariat
777 Bay Street
C/O Business Management Division 17th floor
Toronto Ontario
M5G 2E5

Dear Mr. O'Hara:

RE: Stroud Development Group
Comments on the Proposed Amendment to the Growth Plan, 2017
Reference EBR Registry number 013-4504

On behalf of the Stroud Development Group we would like to take this opportunity to provide comments on the proposed amendment to the Growth Plan for the Greater Golden Horseshoe 2017. The Stroud Development Group, is a group of landowners and developers who have similar interests in the planning and growth of the community of Stroud located in the Town of Innisfil, County of Simcoe. The group has been in discussions with the Town of Innisfil with respect to their willingness to front end the planning approvals and engineering of required servicing upgrades and extensions to Stroud. This group of landowners and developers would make up approximately 200 hectares of future development land within and surrounding Stroud.

The Stroud Development Group has had the opportunity to review the proposed changes and is generally pleased with the direction of the changes. A portion of the changes will allow individual municipal councils to make decisions regarding their own municipalities. In our review, we understand the changes are intended to streamline processes and provide clarity with respect to local official plan updates.

This correspondence provides a summary of our comments to the proposed revisions to the Growth Plan 2017 draft:

1. The proposed Plan continues to place more responsibility on the upper-tier municipalities for land use and growth management decisions and the structure for growth in the lower-tier municipalities. The proposed changes to the Growth Plan will provide additional flexibility in key areas such as Settlement Area Boundary Expansions and Municipal Comprehensive Review (MCR) requirements which we support.

2. The proposed changes to the Growth Plan in sections 2.2.8.4 and 2.2.8.5 maintain the responsibility and control of the settlement area boundary expansion at the upper-tier level. However, flexibility has been included in the proposed changes to allow settlement area boundary expansion considerations outside of an MCR. Adjustments can be considered to settlement areas with delineated built boundaries if there is “no net increase in land”, provided certain criteria is satisfied. We support providing local municipalities the ability for limited boundary expansions outside of the MCR process. We believe further clarity on these expansions is required as it relates to the number of expansions and area calculations.
3. The proposed changes require the upper tier municipality to complete a MCR by July 2022 and a component of this review is to prepare Water and Wastewater master plans. We support this requirement and the need for the County to rely on the local municipality for decisions related to servicing capacity and financial assessment Master Plans.
4. With respect to Intensification and Density targets, we support the proposed changes related to intensification and density targets. We also recognize and support that moving forward, the Town of Innisfil will have to consider intensification and density as it relates to the Metrolinx Rail Line and related transit stations.
5. The proposed changes to the Undelineated Built-Up Areas being changed to “rural settlements” is not considered accurate in all cases. There are “undelineated built-up areas” which are partially serviced and where extension of services would allow existing development to connect to full services, allow the intensification and development of vacant and underdeveloped lands and would allow for the rounding out of settlement areas with partial services. We would suggest that settlement areas with full and partial services be identified as such and that the Rural Settlements verbiage be used only for settlements with no municipal services.

Thank you for the opportunity to provide feedback on the proposed changes to the Growth Plan 2017. If you have any questions, please do not hesitate to contact our offices.

Your truly,
LOFT PLANNING INC.



Kristine Loft, MCIP RPP
Principal