

Hon. Steve Clark
Minister of Municipal Affairs and Housing
Provincial Land Use Plans Branch
13th Floor, 777 Bay Street
Toronto, Ontario
M7A 2J3

Dear Minister Clark,

**RE: Review of A Place to Grow and Provincial Policy Statement (ERO Number 019-6177)
Comments from Farova Investments Ltd.**

Farova Investments Ltd. own a number of properties in the Township of Oro-Medonte and the Town of Innisfil with future development potential including:

- i. Part of Lot 20, Concession 6 in the Township of Oro-Medonte
- ii. Part of Lot 20, Concession 7 in the Township of Oro-Medonte
- iii. Part of Lot 21, Concession 8 in the Township of Oro-Medonte
- iv. 1575 Killarney Beach Road in the Town of Innisfil
- v. 75 Killarney Beach Road in the Town of Innisfil

We are actively working towards developing an industrial/commercial subdivision on the property located at Highway 11 South and Line 7 North in Oro-Medonte.

We have previously submitted detailed letters to the applicable lower tier municipalities requesting the current mapping in the Growth Plan, *the Natural Heritage System for the Growth Plan* and the *Agricultural System for the GGH*, be refined through the Municipal Comprehensive Review process (please see attached); however, since the Province is looking at combining the Provincial Policy Statement (PPS) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan) and streamline the process making the development approval process more effective moving forward, we strongly encourage the Province to simply remove this problematic mapping and the associated Growth Plan policies.

We are supportive of the changes and the efforts the Province is proposing through combining the PPS and the Growth Plan. The Growth Plan contains many redundant policies and further restrictions that exceed the PPS, with limited to no flexibility, making it extremely challenging for development within the Growth Plan, especially in rural areas even rural areas with existing development permissions

The current mapping in the Growth Plan, *the Natural Heritage System for the Growth Plan* and the *Agricultural System for the GGH*, which we acknowledge was not created by the current government, is problematic as it is extremely inaccurate and captures many properties that do not contain agricultural or natural heritage characteristics and/or have existing development permissions. Further problems exist with the language of the associated Growth Plan policies which effectively prohibits any development from occurring with

no flexibility to amend or work around the policies if there are other existing or potential development permissions or lands are inappropriately mapped.

This mapping and policy structure is redundant as there are other policies throughout the PPS, Growth Plan, upper- and lower-tier Official Plans that effectively protects natural heritage and agricultural areas.

It is our recommendation that the mapping and policies be removed as there are many other policies in PPS, GP and Municipal Official Plans that appropriately protect the Natural Heritage System and Agricultural Systems, and have done so successfully for years while still maintaining some flexibility where appropriate.

We would be happy to discuss these comments further with Provincial staff if it is helpful in the Provinces review of the PPS and Growth Plan documents.

Respectfully submitted,

MHBC



Kory Chisholm, BES, M.Sc, MCIP, RPP
Partner



Chloe Spear, BAH, M.Sc.
Intermediate Planner

cc. *Fabian Papa | Farova Investments Inc.*

December 13th, 2021

Greg Marek & Dan Amadio
Corporation of the County of Simcoe
1151 Highway 26,
Springwater, ON
L9X 0Z7

Dear Mr. Marek & Mr. Amadio:

**RE: MCR - Request for Removal of Lands from Provincial Agricultural System and NHS Mapping
(Township of Oro-Medonte)
Our File 14102D**

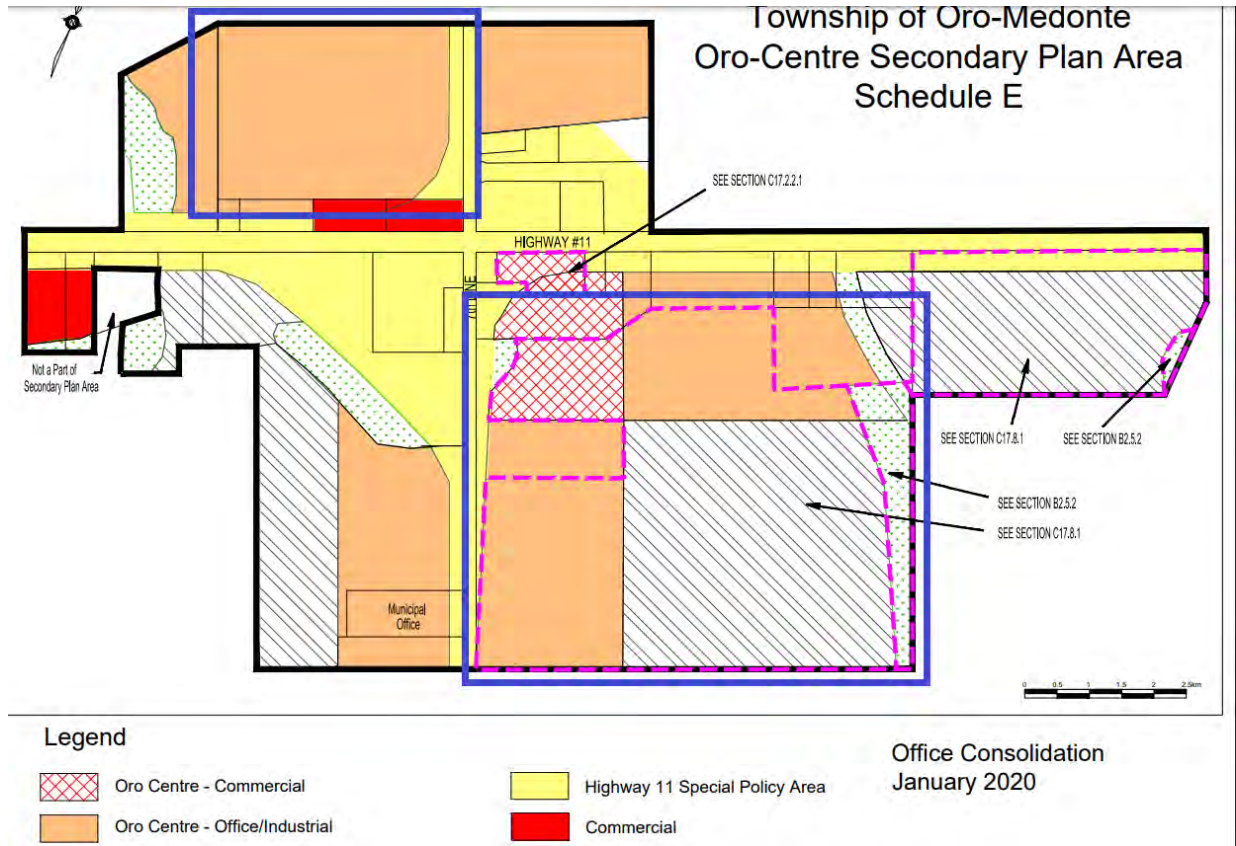
On behalf of our Client – Farova Investments Ltd. we are pleased to provide the following comments regarding the ongoing Simcoe County Municipal Comprehensive Review (MCR) Process. In response to the ongoing MCR process being undertaken for the County of Simcoe Official Plan, we are writing to request that additional properties within the Township of Oro-Medonte are refined from the Provincial Agricultural System and Natural Heritage System mapping through the MCR refinement process.

There are three properties within the Township, all within close proximity to Line 7 and Highway 11, which are mapped within these Provincial Systems. The list of properties to be refinements made from the Provincial Agricultural System and the Natural Heritage System mapping include:

- i) Part of Lot 20, Concession 6 in the Township of Oro-Medonte
- ii) Part of Lot 20, Concession 7 in the Township of Oro-Medonte
- iii) Part of Lot 21, Concession 8 in the Township of Oro-Medonte

The two properties that are requested to be removed entirely from the Agricultural System and Natural Heritage System mapping are both located within the Oro-Centre Secondary Plan Area within the Township of Oro-Medonte's Official Plan. As this area contains a direct access point to Highway 11 and close proximity to the Lake Simcoe Regional Airport, the policies for these lands recognize the potential for future growth. The northern property is designated as "Oro-Centre – Office/Industrial" and the southern property is designated "Oro-Centre – Limited Service Industrial" as well as "Oro-Centre – Office Industrial" under Schedule E of the Township's Official Plan. Both of these designations are recognized by the Township as lands that can be used for a wide variety of office and industrial land uses that will generate employment opportunities within the Township. As both of these properties are recognized for their potential to develop and provide employment opportunities, it is requested that they are removed from the Provincial mapping as not to hinder future development on these lands that would otherwise be

feasible. It should also be stated that these properties appear to not contain any visible significant natural heritage features from our review of available aerial imagery.



Figures for the specific land areas discussed above for removal consideration have been attached to this letter. As previously mentioned, these properties are located at a strategic area for the Township due to their proximity to the major transportation nodes of Highway 11 and the Lake Simcoe Regional Airport. The Township of Oro-Medonte may also wish to examine the potential of removing all lands within this Secondary Plan Area from the provincial mapping in order to protect for the long term planned function and economic opportunities these lands represent. Therefore, it is requested that these three properties within Oro-Medonte are removed from the Provincial Agricultural System and the Natural Heritage System mapping as part of the County's MCR process.

The third property in question is located directly along Highway 11, west of Oro-Centre, and is currently developed with a large solar farm. This lot contains a forested area on the west of the property and cleared lands on the east. This particular request is unique as the Owner has requested that only a small portion of the lands on the south west corner is removed from the Agricultural System instead of the entire lot (outlined in red on the attached figure). Abutting the subject area is a group of properties containing single detached dwellings and other residential uses are within the surrounding area. Given that this portion of the lot abuts other residential uses and the provincial Highway 11 overpass, the southwest corner of the subject land should be removed from the Provincial Agricultural System to allow for potential future uses that can capitalize on the existing infrastructure at this strategic location.

We would be happy to arrange a meeting to review and discuss these requests further with County staff.
Yours truly,

MHBC



Kory Chisholm, BES, MSc, MCIP, RPP
Partner

*Cc. Fabian Papa | Farova Investments Ltd. c/o Fabian Papa & Partners
Andria Leigh | Township of Oro-Medonte*

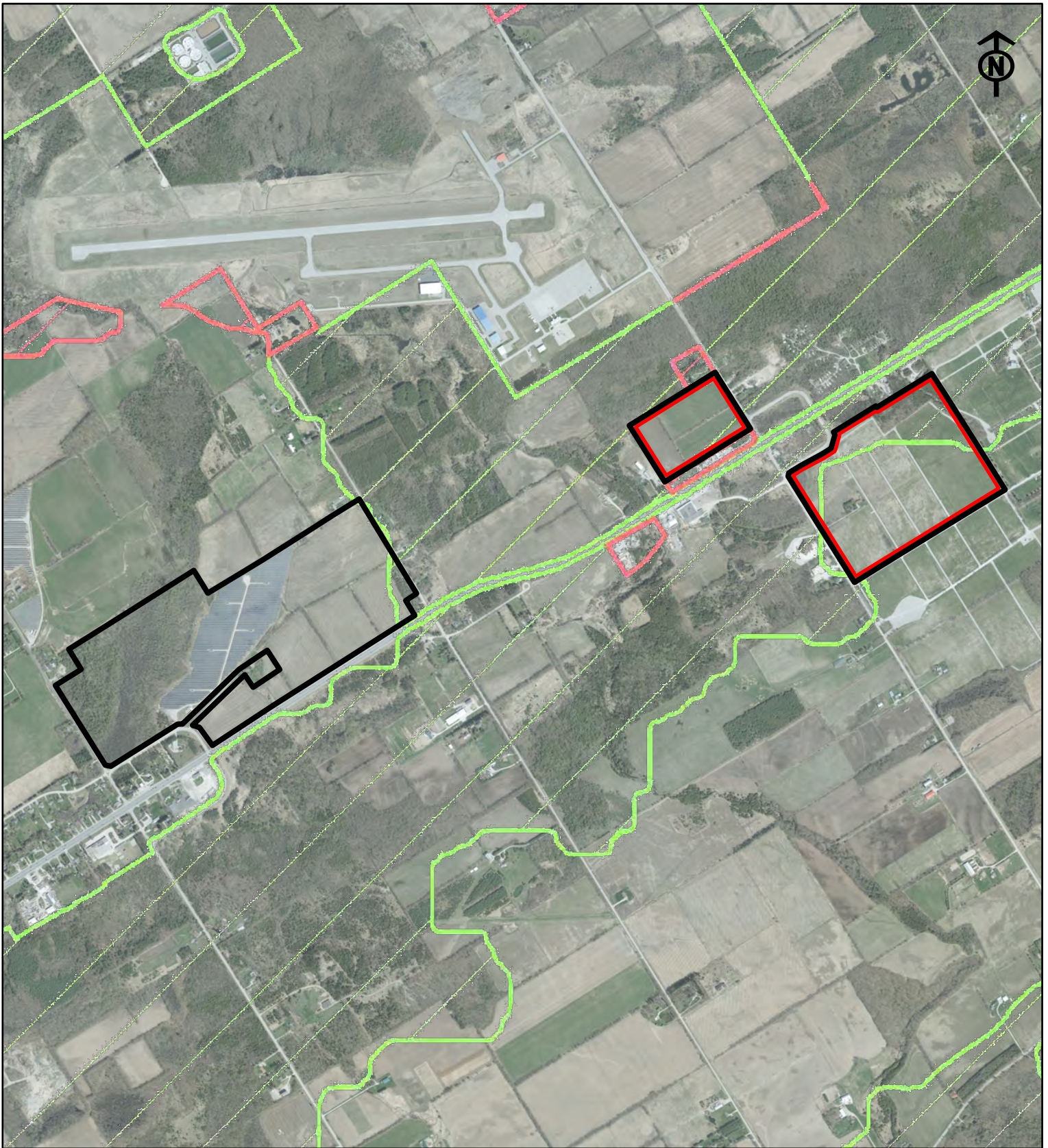







FIGURE 1
REFINED NATURAL HERITAGE SYSTEM

County of Simcoe
 MCR Mapping Review

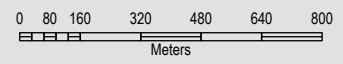
Oro-Medonte Sites
 Township of Oro-Medonte
 County of Simcoe

LEGEND

-  Property Boundary
-  Refined Growth Plan NHS (Simcoe County)
-  Proposed Addition (Simcoe County)
-  Proposed Removal (Simcoe County)
-  Specific Area Removal

DATE Dec. 10, 2021

SOURCES
 Simcoe County - Growth Plan NHS
 Refined Growth Plan NHS - Map Title 36



14102D - Simcoe MCR



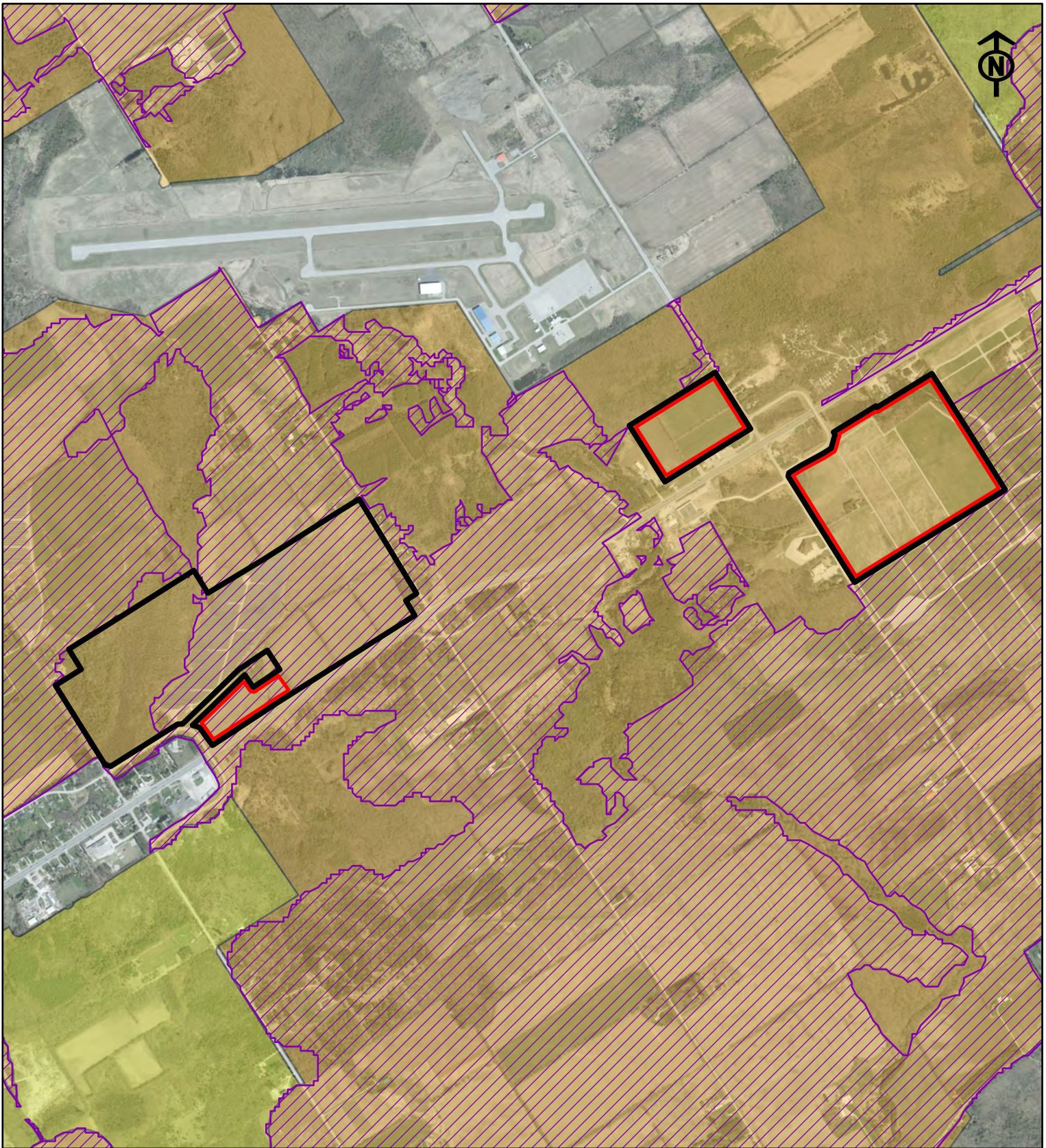


FIGURE 2
REFINED AGRICULTURAL SYSTEM

County of Simcoe
MCR Mapping Review

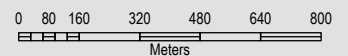
Oro-Medonte Sites
Township of Oro-Medonte
County of Simcoe

LEGEND

-  Property Boundary
-  Existing Agricultural (Simcoe County)
-  Prime Agricultural Area (Ontario)
-  Candidate Area (Ontario)
-  Specific Area Removal

DATE Dec. 10, 2021

SOURCES
 Simcoe County - Official Plan
 Land Information Ontario
 Greater Golden Horseshoe - Agricultural Land Base



14102D - Simcoe MCR



April 20, 2022

Greg Marek & Dan Amadio
Corporation of the County of Simcoe
1151 Highway 26,
Springwater, ON
L9X 0Z7

Dear Mr. Marek & Mr. Amadio:

**RE: County MCR - Request for Removal of Lands from Provincial Agricultural System Mapping
(Township of Oro-Medonte)
Our File 14102D**

Further to the letter our office previously submitted on behalf of Farova Investments Ltd., dated December 13, 2021, we offer the following comments on the recently released County Refined Prime Agricultural Area Mapping.

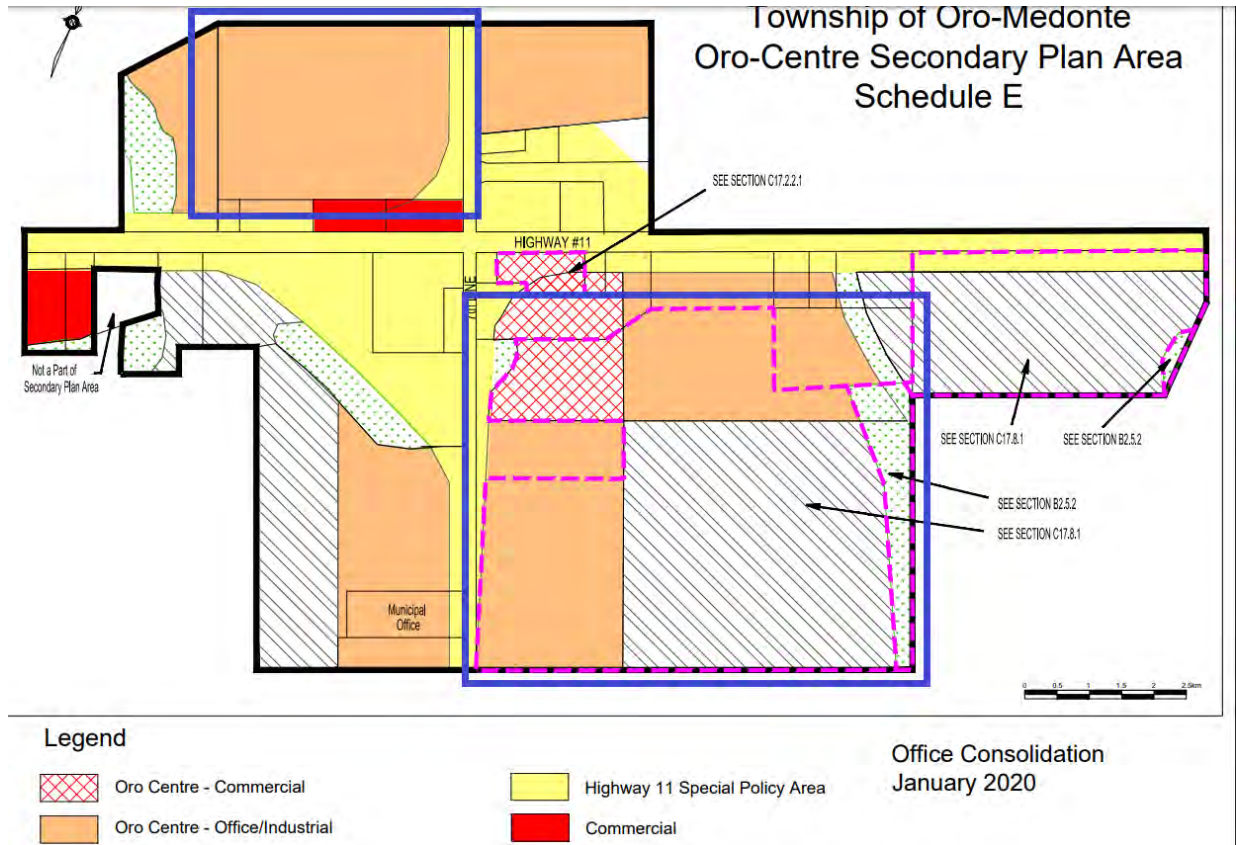
In response to the ongoing MCR process being undertaken by the County of Simcoe and culminating in a new County of Simcoe Official Plan, we are writing to request that the identified portions of the properties within the Township of Oro-Medonte be refined from the Provincial Agricultural System mapping as identified on the attached figures through the MCR refinement process.

There are three properties within the Township, all within close proximity to Line 7 and Highway 11, which are mapped within these Provincial Systems. The list of properties to be refinements made from the Provincial Agricultural System and the Natural Heritage System mapping include:

- i) Part of Lot 20, Concession 6 in the Township of Oro-Medonte
- ii) Part of Lot 20, Concession 7 in the Township of Oro-Medonte
- iii) Part of Lot 21, Concession 8 in the Township of Oro-Medonte

The two properties that are requested to be removed entirely from the Agricultural System mapping are both located within the Oro-Centre Secondary Plan Area within the Township of Oro-Medonte's Official Plan. As this area contains a direct access point to Highway 11 and close proximity to the Lake Simcoe Regional Airport, the policies for these lands recognize the potential for future growth. The northern property is designated as "Oro-Centre – Office/Industrial" and the southern property is designated "Oro-Centre – Limited Service Industrial" as well as "Oro-Centre – Office Industrial" under Schedule E of the Township's Official Plan. Both of these designations are recognized by the Township as lands that can be used for a wide variety of office and industrial land uses that will generate employment opportunities within the Township. As both of these properties are recognized for their potential to develop and provide

employment opportunities, it is requested that they are removed from the Provincial mapping as not to hinder future development on these lands that would otherwise be feasible. It should also be stated that these properties appear to not contain any visible significant natural heritage features from our review of available aerial imagery.



Figures for the specific land areas discussed above for removal consideration have been attached to this letter. As previously mentioned, these properties are located at a strategic area for the Township due to their proximity to the major transportation nodes of Highway 11 and the Lake Simcoe Regional Airport. The Township of Oro-Medonte may also wish to examine the potential of removing all lands within this Secondary Plan Area from the provincial mapping in order to protect for the long term planned function and economic opportunities these lands represent. Therefore, it is requested that these two properties within Oro-Medonte are removed from the Provincial Agricultural System mapping as part of the County's MCR process.

The third property in question is located directly along Highway 11, west of Oro-Centre, and is currently developed with a large solar farm. This lot contains a forested area on the west of the property and cleared lands on the east. This particular request is unique as the Owner has requested that only a small portion of the lands on the south west corner is removed from the Agricultural System instead of the entire lot (outlined in red on the attached figure). Abutting the subject area is a group of properties containing single detached dwellings and other residential uses are within the surrounding area. Given that this portion of the lot abuts other residential uses and the provincial Highway 11 overpass, the southwest corner of the subject land should be removed from the Provincial Agricultural System to allow for potential future uses that can capitalize on the existing infrastructure at this strategic location.

We would be happy to arrange a meeting to review and discuss these requests further with County staff.
Yours truly,

MHBC



Kory Chisholm, BES, MSc, MCIP, RPP
Partner

*Cc. Fabian Papa | Farova Investments Ltd. c/o Fabian Papa & Partners
Andria Leigh | Township of Oro-Medonte*

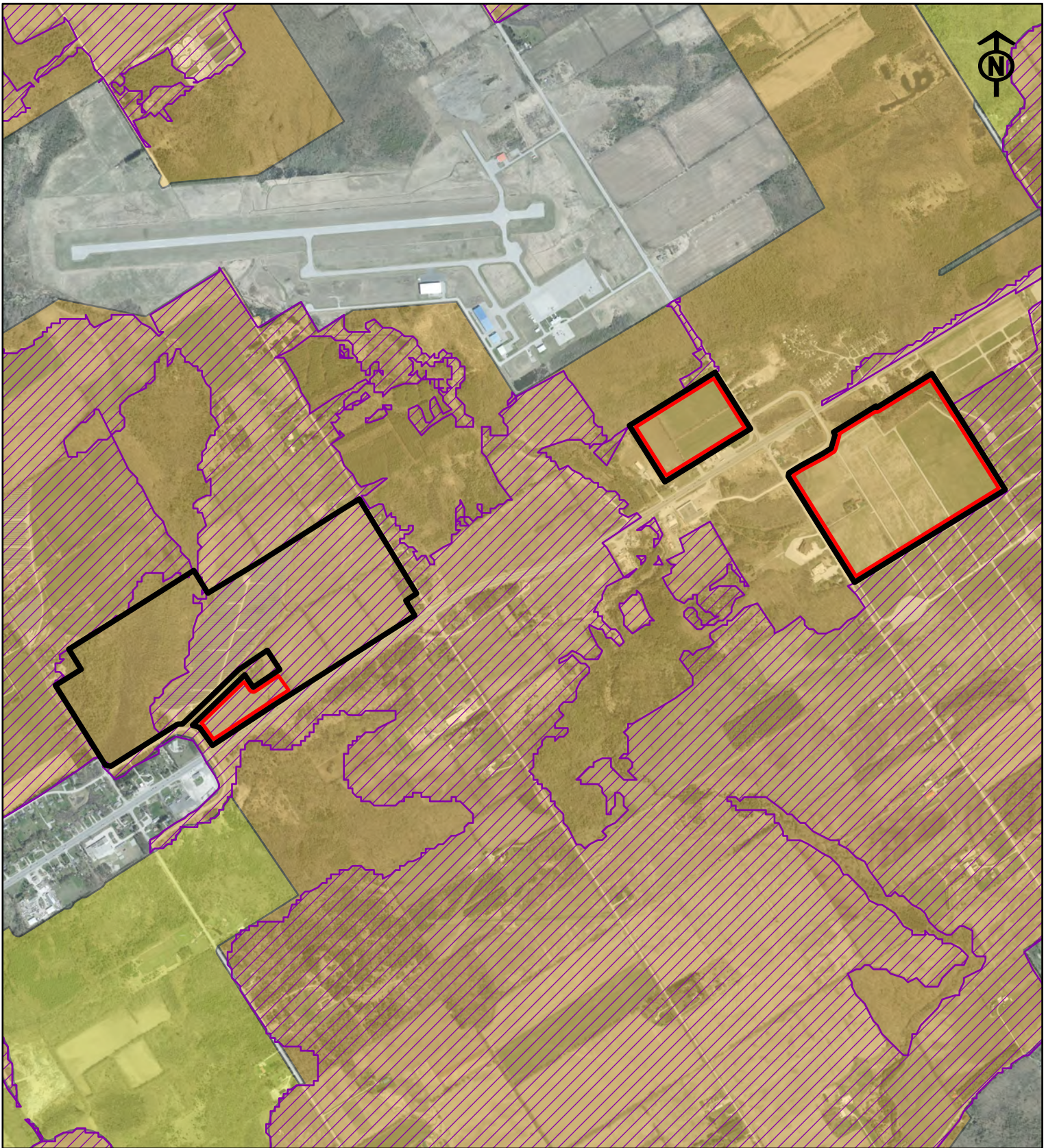


FIGURE 1
REFINED AGRICULTURAL
SYSTEM

County of Simcoe
MCR Mapping Review

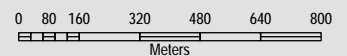
Oro-Medonte Sites
Township of Oro-Medonte
County of Simcoe

LEGEND

-  Property Boundary
-  Existing Agricultural (Simcoe County)
-  Prime Agricultural Area (Ontario)
-  Candidate Area (Ontario)
-  Specific Area Removal

DATE Dec. 10, 2021

SOURCES
 Simcoe County - Official Plan
 Land Information Ontario
 Greater Golden Horseshoe - Agricultural Land Base



14102D - Simcoe MCR

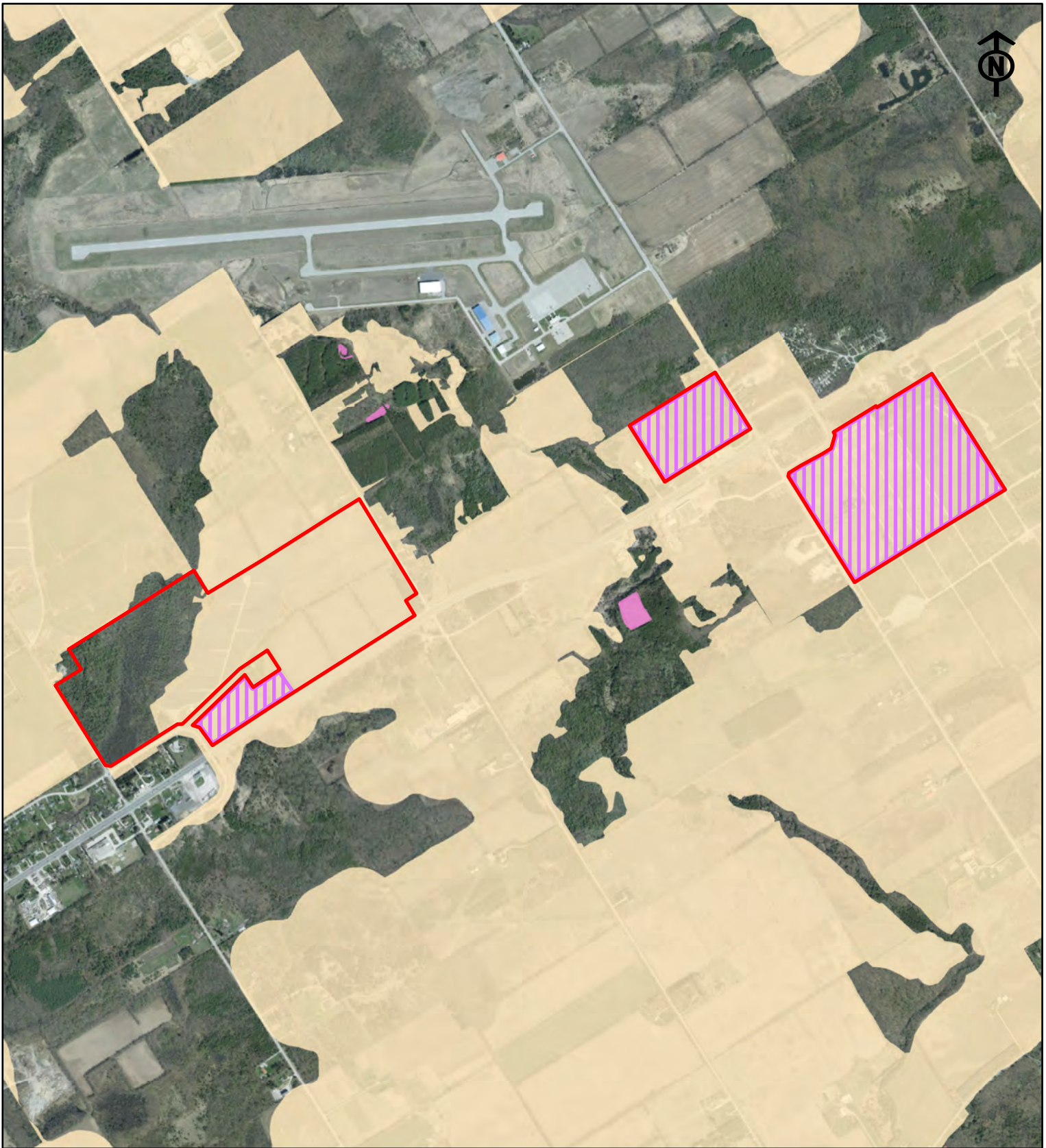


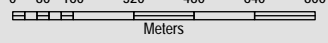
FIGURE 2
REFINED AGRICULTURAL
SYSTEM

County of Simcoe
MCR Mapping Review

Oro-Medonte Sites
Township of Oro-Medonte
County of Simcoe

LEGEND

- Property Boundary
- Proposed Area to be Removed (Simcoe County)
- Prime Agricultural Area (Ontario)
- Lands Requested to be Removed from County's Refined Prime Agricultural Area Mapping

DATE	March, 2022
SOURCES	Simcoe County - Official Plan Land Information Ontario Greater Golden Horseshoe - Agricultural Land Base
	0 80 160 320 480 640 800  Meters
	14102D - Simcoe MCR March 2022



December 13th, 2021

Greg Marek & Dan Amadio
Corporation of the County of Simcoe
1151 Highway 26,
Springwater, ON
L9X 0Z7

Dear Mr. Marek & Mr. Amadio:

**RE: MCR - Request for Removal of Lands from Provincial Agricultural System Mapping
(Town of Innisfil)
Our File 14102D**

On behalf of our Client – Farova Investments Ltd. we are pleased to provide the following comments regarding the ongoing Simcoe County Municipal Comprehensive Review (MCR) Process. In response to the ongoing MCR process being undertaken for the County of Simcoe Official Plan, we are writing to request that the property municipally known as 1575 Killarney Beach Road be removed from the Provincial Agricultural System Mapping through the County's refinement process.

While this property is currently designated Agricultural in the Simcoe County Official Plan and Agricultural Area in the Town of Innisfil Official Plan they do immediately abut the Lefroy-Belle Ewart Settlement Area, several existing single detached residential properties along Killarney Beach Road and are adjacent to Killarney Beach Public School. Based on these lands' location abutting the Lefroy-Belle Ewart Settlement Area and being adjacent to an existing Public School they would appear to be well situated to accommodate future expansion of the Lefroy-Belle Ewart Settlement Area, capitalizing on existing infrastructure systems adjacent to the property, and by refining the Agricultural System mapping from these lands it would assist in protecting for that future possibility.

Figures for the specific land areas discussed above for removal consideration have been attached to this letter.

We would be happy to arrange a meeting to review and discuss these requests further with County staff.

Yours truly,

MHBC



Kory Chisholm, BES, MSc, MCIP, RPP
Partner

*Cc. Fabian Papa | Farova Investments Ltd. c/o Fabian Papa & Partners
Tim Cane | Town of Innisfil*

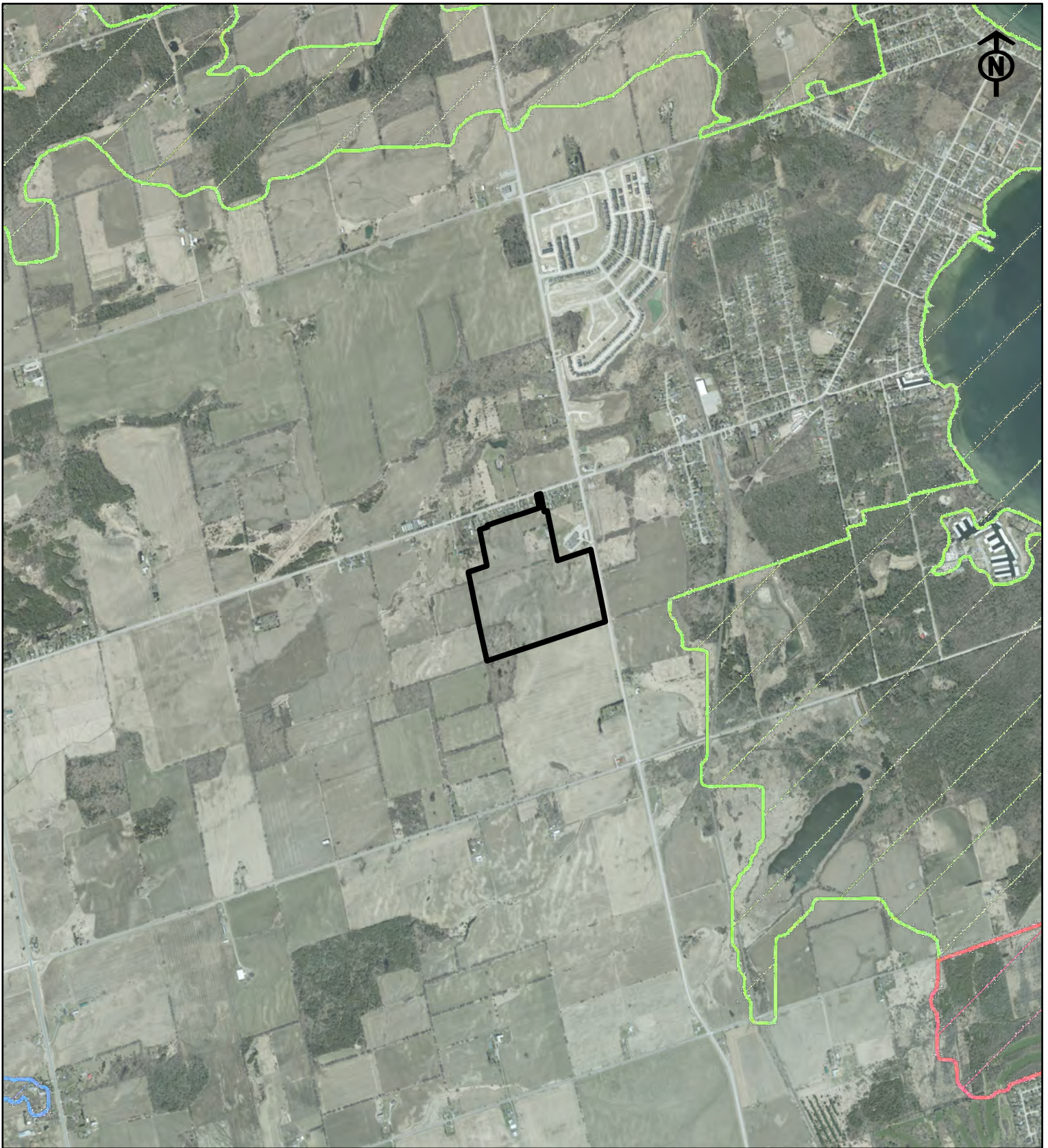






FIGURE 1
REFINED NATURAL HERITAGE SYSTEM

County of Simcoe
MCR Mapping Evaluation

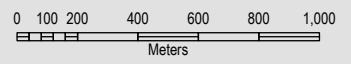
Innisfil Site
Town of Innisfil
County of Simcoe

LEGEND

-  Property Boundary
-  Refined Growth Plan NHS (Simcoe County)
-  Proposed Addition (Simcoe County)
-  Proposed Removal (Simcoe County)

DATE Dec. 10, 2021

SOURCES
Simcoe County - Growth Plan NHS
Refined Growth Plan NHS - Map Title 22



14102D - Simcoe MCR



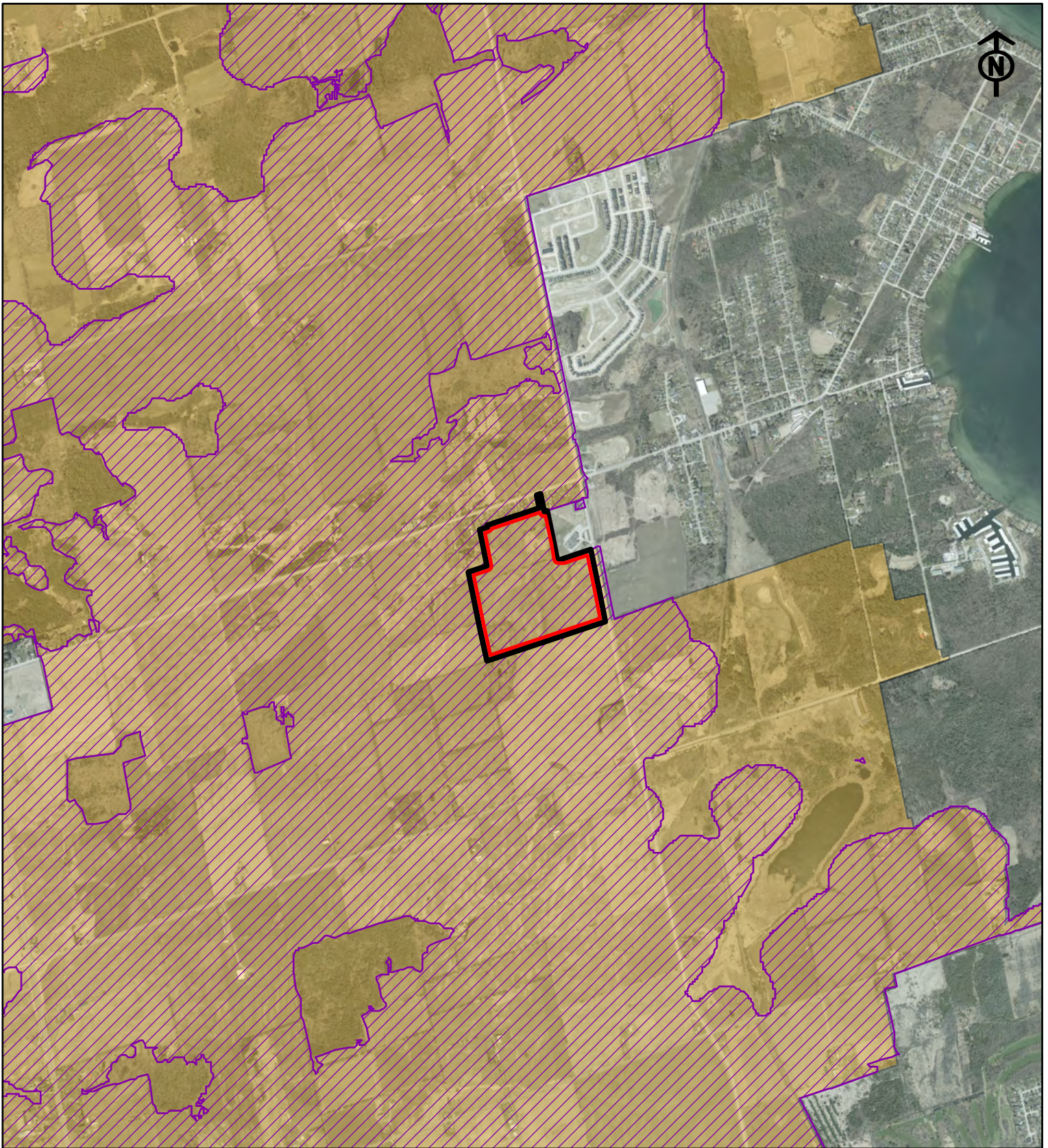


FIGURE 2
REFINED AGRICULTURAL SYSTEM

County of Simcoe
 MCR Mapping Review

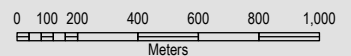
Innisfil Site
 Township of Oro-Medonte
 County of Simcoe

LEGEND

-  Property Boundary
-  Existing Agricultural (Simcoe County)
-  Prime Agricultural Area (Ontario)
-  Candidate Area (Ontario)
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DATE Dec. 10, 2021

SOURCES
 Simcoe County - Official Plan
 Land Information Ontario
 Greater Golden Horseshoe - Agricultural Land Base



14102D - Simcoe MCR

