



Planning and Development Services Department

October 23, 2008

Bryan MacKell, Director of Planning & Development
Planning Department
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, Ontario, L0L 1X0

Dear Mr. MacKell:

Re: Preliminary Staff Comments on the draft County of Simcoe Official Plan

Thank you for the opportunity to provide comments with respect to the above noted draft document. We note that some of the policies will impact York Region and we look forward to working with you throughout the OP finalization process.

The draft Official Plan represents a comprehensive planning document that captures many of the policies stemming from Provincial policy, including the Growth Plan for the Greater Golden Horseshoe (the *Growth Plan*). We note that the OP includes policies on growth management, density and intensification, transportation, complete communities, and protection of the greenlands. We have also reviewed the "Simcoe Area Growth Plan" by Hemson Consulting Ltd. and many of the recommendations from this report have been carried through to the new OP, including total population growth based on the overall *Growth Plan* forecast allocations.

We acknowledge that 80% of the forecasted Simcoe growth set out in *the Growth Plan* has already been allocated through the approval of local Official Plan Amendments and through the Provincial disaggregation process. We would note that the growth allocations as proposed in the draft Simcoe County Official Plan support activity rates for the local municipalities within the County that are very low when compared with activity rates in the Greater Toronto Area (GTA). This is even more evident in some of the municipalities within southern Simcoe County, including Innisfill which has a projected activity rate of only 20%. A low activity rate results in bedroom communities and excessive commuting to southern municipalities including York Region, and is not supportive of the intent of *the Growth Plan*. York Region is concerned with the negative impact of such commuting on Provincial Highways and York Region road infrastructure and traffic patterns.

Currently we understand that the County does not have the authority to determine population allocation for the City of Barrie, the City of Orillia, nor the First Nations. The County has also allocated part of the unallocated 40,000 additional population to the City of Barrie and distributed the remaining population across the County. We are seeking clarification and assurance that, as a result of the potentially premature apportionment of the unallocated 40,000 population, the total population projections for the Simcoe Area will not end up exceeding the population forecasts established in *the Growth Plan*.

In addition to the above, the low intensification requirements proposed in the draft OP, in combination with the high growth numbers of Table 1, will likely result in more low rise suburban subdivisions and we would recommend that the same intensification standards that are required across the GTA also be applied within Simcoe County.

We also note that there is no direct policy connection provided to the work that was completed through the Inter-Governmental Action Plan (IGAP), including the Assimilative Capacity (AC) model. As you are aware, York Region staff participated in the IGAP project. The relevant recommendations of the IGAP would provide a valuable basis for not only your growth management policies but monitoring the health of Simcoe's environmental systems.

While Staff is encouraged by the County's Transportation Master Plan (detailed comments attached), we note that there is no comprehensive County master plan for water and wastewater servicing. As a similar upper tier level of government, and as was recommended in the IGAP, we would support the County assuming overall responsibility of water and wastewater planning. This would help ensure coordination of infrastructure projects, including the delivery of infrastructure appropriately phased with the staging of development, and assist in financing and ensuring the highest quality of water and wastewater systems.

The proposed Lake Simcoe Protection Act will likely be proclaimed later this year, and it is clear that the Act, and the Plan that will follow, will have an effect on the way water and wastewater is treated and the way we plan for communities within the Lake Simcoe watershed and abutting areas. Recognizing the legislation is not yet proclaimed, there may still be value in the County considering policies within its new OP to acknowledge the pending legislation and plan.

The OP draws on the recommendations of a report entitled "Development of a Natural Heritage System for the County of Simcoe"; however, as noted in the past, we believe that development in Simcoe County should be subject to the same planning environmental standards and infrastructure requirements as growth in the GTA. As Regional Council has indicated before, it is our recommendation that the Province should extend the same planning policies in place in the GTA to Simcoe County, including the Greenbelt Plan.

With respect to transportation, we have attached comments on the Transportation Master Plan. With respect to transportation policies within the draft OP, we offer the following comments:

1. Section 4.8.45 could be clarified to reinforce the Transportation Master Plan by encouraging local municipalities to explore collaborating with municipalities outside the County to foster inter-regional transit linkages, where appropriate (realizing that York Region is likely the only neighbouring municipality to whom this policy would apply).
2. Section 4.8.6 should be revised to include that: the County will consider the neighbouring municipalities' Transportation Master Plans and Official Plans to promote and improve important transportation links between the neighbouring municipalities and the County of Simcoe.
3. Even with the planned improvements, the County's Transportation Master Plan has determined that there remains a deficient north-south transportation network crossing the York-Simcoe boundary. Significant growth is planned in southern Simcoe County, which will result in a strong southern orientation of trips. As such, the Region recommends that the ongoing protection for, and identification of an extension of Highway 427 through to Barrie should be added to Section 4.8.9.
4. The Region also strongly supports the County's identification for the immediate need of the Bradford Bypass (Section 4.8.9), and offers its support in working with the Province in implementing this important transportation link.
5. The Region supports the County's strong transit and travel demand management initiatives identified in the Official plan and Transportation Master Plan. To help support this goal, the Region recommends that an additional section be added to 4.8.9 that recommends extending conventional transit services into adjacent regional municipalities. This policy would further support the identified need in the Transportation Master Plan for a future transit service within Bradford West-Gwillimbury and opportunities to connect to the existing Viva Rapid Transit system in Newmarket.
6. As there are limited north-south connections between the County and the Region of York, ensuring that approved development is phased in a manner that matches the implementation of the required infrastructure is important. As such, an additional section should be added to the Official Plan that ensures the phasing of development with the required infrastructure (roads, transit, water, and wastewater).

Lastly, we note some minor modifications to the Schedules attached to the OP as follows:

1. Schedule 5.1 – Please confirm that the Official Plan does not propose any expansions to the existing Settlement Areas.
2. Schedule 5.2.2 – Please remove the “Provincially Significant Wetlands” notation from York Region lands
3. Schedule 5.2.3 – Please remove the “ANSI – Provincial” notation from York Region lands

We would be pleased to meet with you to discuss any of these matters and if you have any questions, please contact me at 905 830-4444, Ext. 1502.

By this letter we hereby request notification of any future meetings in regard to this Official Plan and Notice of any actions, including adoption of the Official Plan, that Council may take.

Yours truly,



Heather Konefat, M.C.I.P., R.P.P.
Director, Community Planning

c: Mr. Larry Clay, Assistant Deputy Minister, M.M.A.H.
Mr. Brad Graham, Assistant Deputy Minister, M.P.I.R.
Nathan Westendorp, Planner II, County of Simcoe