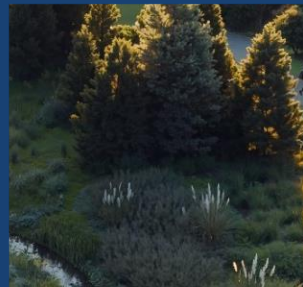
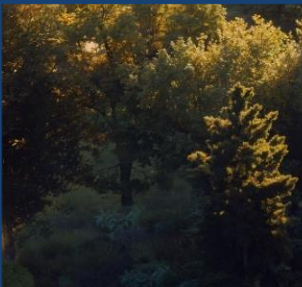


PLANNING RATIONALE REPORT

Hawk Ridge Redevelopment

Prepared for LIV Communities





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1.0

INTRODUCTION

The Biglieri Group Ltd. has been retained by LIV (Hawk Ridge) LP; LIV (Hawk Ridge) GP Inc. to prepare a Planning Rationale Report in support of the proposed redevelopment of a portion of the existing Hawk Ridge Golf Club for residential purposes. Hawk Ridge Golf Club is located at 1151 Hurlwood Lane (the “subject site” or “site”) in the Township of Severn. The properties within the subject site’s redevelopment area are legally described as:

- PCL 50-1 SEC 51M489; BLK 50 PL 51M489 SOUTH ORILLIA; S/T RO86138, RO90681, RO956151, RO956152; SEVERN
- BLK 49 PL 51M489 SOUTH ORILLIA, EXCEPT PTS 9, 10 & 11 PL 51R35510; S/T RO1164058, RO86138, RO86264, RO956151, RO966042; SEVERN
- PCL 1-8 SEC 51-S.O.-4; PT LT 2 CON 4 SOUTH ORILLIA PT 1 51R27783 EXCEPT PT 2 51R28633; SEVERN
- PCL 1-7 SEC 51-S.O.-4; PT LT 1 CON 4 SOUTH ORILLIA PT 3 51R27783; SEVERN

The subject site is approximately 125 hectares in size and currently contains a 27-hole golf course, including a driving range, clubhouse, parking lot, maintenance and service buildings. The site is located between Burnside Line to the east and Uthhoff Line to the west and borders the Inch Farm and Area 3 Plans of Subdivision to the south. The municipal boundary with the City of Orillia is also to the south and west. The property location is shown on **Figure 1**. Vehicular access to the site is located at the end of Hurlwood Lane, which leads directly to the existing parking lot and clubhouse. Specific details, including building footprint and dimensions, setback, site statistics, landscaped areas/buffers and site access, can be seen in the site plan document, enclosed within this submission package.

The proposed redevelopment of a portion of the golf course requires applications for Official Plan Amendment and Zoning By-law Amendment to allow for residential uses, and Draft Plan of Subdivision to create the roads, lots, and blocks. Applications for Site Plan Control and Condominium Approval will be required for the stacked townhouse blocks (‘Golf Villa’) blocks at the time of development. The proposal aims to create a golf-centred residential community with a total of 450-900 residential units. An 18-hole golf course will be retained and redesigned, as well as the existing clubhouse. The development will consist of single-detached, townhouse, and Golf Villa dwellings.

Connections to the new residential areas will be provided from Uthhoff Line and Hurlwood Lane. An entry feature is proposed along Hurlwood Lane to create a gateway to the new residential development, the clubhouse, and the existing golf course. The entry feature is designed to create sense of place and foster a community identity. The redevelopment aims to create a welcoming entrance to the golf course, creating a focal point for future residents and visitors. Existing homes on Hawk Ridge Crescent will continue to back onto the golf course, ensuring rear yard conditions remain unchanged, and minimizing the impacts of redevelopment on current residents. The development on the west side of Silver Creek, accessed via Uthhoff Line, will include a mix of single detached homes and townhouses.

Silver Creek runs through the centre of the property and is currently characterized as a feature within the golf course with manicured lawns along the floodplain. The proposed redevelopment will re-naturalize the Silver Creek corridor to enhance its natural features. Extensive field surveys have identified natural heritage features and species at risk, informing the concept plan and forming the basis for a future Environmental Impact Study. In addition to the renaturalization of this corridor, public trails are proposed to provide passive recreational opportunities, and to allow residents direct access to the natural environment.

Within the County of Simcoe Official Plan Schedule 5.1, the subject site is shown within the South of Division Road Secondary Plan. It is designated as Open Space and Environmental Protection as part

of the Township of Severn Official Plan South of Division Road Secondary Plan. The Township of Severn's Zoning By-law 2010-65 zones the site Recreational Commercial Type 9 (C9).

To permit the proposed development, this proposal seeks to redesignate a portion of the Open Space area to Countryside Residential in the Township of Severn Official Plan. The existing Environmental Protection designated area will be increased, as well and will result in an overall improvement in the natural area. The proposal also seeks to rezone a portion of the subject site from Recreational Commercial Type 9 to Residential Type One – R1 and Medium Density Residential – RM1, and Medium Density Residential Type Two – RM2 to allow for single-detached, townhouse, and stacked townhouse dwelling typologies, as well as rezoning the Silver Creek Corridor to Environmental Protection. The rezoning seeks site specific permissions which are outlined within the enclosed Draft Zoning By-law Amendment.

The Township of Severn passed a motion in April 2023 which recognized the subject lands as an area which is the logical location for the Township's long-term residential growth. The Township of Severn passed a motion on April 19th, 2023 which recognized the subject lands as an area which is the logical location for the Township's long-term residential growth. This motion, and letter to the Ministry of Municipal Affairs and Housing which followed, encouraged the Province to identify the South of Division Road Secondary Plan area as a settlement area in the County of Simcoe Official Plan. This resolution has created the basis for supporting residential growth within this area.

A Pre-Consultation meeting with Township of Severn, County of Simcoe, and the Severn Sound Environmental Association was held on June 6, 2024, during which time the proposed development was discussed, and feedback was received on the requirements for a complete application. This Planning Rationale Report has evaluated the merits of the development proposal in the context of all applicable Provincial, County, and Township policies. We conclude that the applications for Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision are consistent with and conform to the policy framework articulated in the Provincial Planning Statement (2024), Provincial Policy Statement

(2020), the Growth Plan for the Greater Golden Horseshoe (2020), the County of Simcoe Official Plan (2023), the Township of Severn Official Plan (2010), the Council-adopted Township of Severn Official Plan (2022), and the Council-adopted South of Division Road Secondary Plan (2022).

Figure 1 – Subject Site



2.0 Proposal

2.1 Description of the Proposed Development

This proposal seeks to redevelop a portion of the subject site with a residential development consisting of approximately 450-900 residential units around a redesigned 18-hole golf course. The existing clubhouse will be retained to become a focal point in the newly created community. Proposed units include a mix of single detached, townhouse, and stacked townhouse dwellings which are designed to occupy pockets throughout the redesigned golf course. Stacked townhouse dwellings are referred to as 'Golf Villas.'

Road connections to the residential areas will be provided from Uthoff Line and Hurlwood Lane. A feature will be introduced at the golf course entrance as a gateway to the redesigned course as well as the new residential area. The entrance feature will create a sense of community and instill a sense of place in the redesigned Hawk Ridge area. One proposed road will cross Silver Creek to ensure that the community is connected on both sides of creek, as well as ensuring access for emergency services. A passive recreational trail will be incorporated into the Silver Creek environmental block which will be dedicated to the Township as part of the Plan of Subdivision.

The redesigned golf course will continue to wrap around the rear yards of existing residential dwellings on Hawk Ridge Crescent. This design choice will ensure minimal disruption to existing properties in the area. Enhanced golf screening and landscaped buffering will also be introduced between dwellings on Hawk Ridge Crescent and the golf course to ensure privacy and protection for existing residents.

The Silver Creek corridor will be enhanced with the planting of native vegetation to extend and preserve the natural heritage assets in the area. Extensive field surveys have been completed to delineate the natural heritage features and identify any species at risk. These investigations have been used to guide the proposed concept plan.

Existing municipal servicing is not available for the subject site. As such, new municipal water and wastewater services will be constructed to accommodate the proposed development. New water wells will be drilled, and a water tower will be constructed to provide water supply and appropriate water pressure for the proposed development. A new wastewater treatment facility will be constructed to accommodate the anticipated sewage created, which will become a municipally owned infrastructure. Furthermore, the system will be designed in accordance with applicable Provincial standards and will be designed to accommodate neighbouring developments, if required.

2.2 Redevelopment Rationale

The Township of Severn passed a motion on April 19th, 2023 which recognized the subject site as a priority area for the Township's long-term residential growth. LIV Communities (LIV [Hawk Ridge] LP; LIV [Hawk Ridge] GP Inc.) purchased the subject site and envisions creating a golf-centred residential community, reimagining the golfing experience for Hawk Ridge players, and bringing new housing supply to the Township of Severn, in a strategically location adjacent to the City of Orillia.

Hawk Ridge Golf Club opened more than 30 years ago. During the course's tenure, golf has evolved. Technology and equipment have advanced, and golfers are seeking increasingly challenging courses. LIV enlisted Jeff Mingay Golf Course Architect to redesign Hawk Ridge, creating an improved golf experience to meet the demands of today's golfers.

There is a symbiotic relationship between the proposed golf course redesign and the introduction of residential uses throughout the site. The current housing environment, both across the Province and locally in the County of Simcoe, requires making efficient use of available land to accommodate existing and anticipated populations. Creating a world-class golf experience necessitates offsetting the cost of the landscape redesign with other revenue streams. Hawk Ridge presents the perfect opportunity to accomplish both objectives at once. The proposal adds housing in an area well served by nearby services, transportation networks, and in an attractive landscape; and modernizes the golf course for an evolved game. To accomplish these objectives together, reducing the number of holes on the course is required.

While the Hawk Ridge redevelopment plan proposes reducing the course size from 27 to 18 holes, the local area is well served by golf courses. The proposed reduction in course size will not impact access to golfing in the Township of Severn and its surrounding area. There are six (6) golf courses near Hawk Ridge; three within a 10-kilometre radius. During its tenure as owners of Hawk Ridge Golf Club, LIV has noted that the availability of tee times is rarely, if ever constrained, indicating that there is ample supply of golf tee times in the area. The question arising from the Hawk Ridge proposal is how to increase the quality of the local golf market, rather than simply looking at quantity.

Reducing the size of the golf course will also allow for a number of key natural heritage features to be transferred to public ownership, which will allow for the long-term protection of these features. It will also allow for the construction of passive recreational trails. Although the golf course is designated Open Space, it is privately owned, and only those who have paid to play golf are permitted to access the site. The redevelopment of these lands will not result in the loss of public open space. Rather, it will increase protection of the natural heritage features while simultaneously improving the public access to and enjoyment of those features.

Introducing residential uses on the subject site will bolster the Township of Severn's tax base, allowing residents to continue enjoying services and facilities within the Township's boundary. Creating

a world-class golf facility will aid the Township economically, as it will draw new patrons to the area. This new golf-centred community will serve as a natural extension to the Inch Farm and Area 3 Plans of Subdivision adjacent to the subject site (in the City of Orillia and Township of Severn respectively). As the City of Orillia continues to grow north and west in the direction of Hawk Ridge, this proposed development will allow for the Township of Severn to logically and efficiently manage growth while preserving the Township's rural landscape.

LIV Communities enjoys a strong working relationship with the Township of Severn and County of Simcoe and is eager to continue collaborating to introduce new residential uses and bring a world-class golf experience to the area.

2.3 Required Approvals

The proposed development seeks an Official Plan Amendment to redesignate a portion of the subject site from Open Space to Countryside Residential with amended permissions for townhouse and stacked townhouse typologies to be accommodated on a municipally owned servicing system. The redesigned golf course will remain Open Space. Additional natural heritage lands will be designated Environmental Protection. The proposal seeks a Zoning By-law Amendment to rezone a portion of the subject site for residential uses. A Plan of Subdivision is required to establish blocks roads and lots. Eventually, a Plan of Condominium will be pursued to establish Golf Villa Condominium blocks.

2.3.1 Draft Official Plan Amendment

The subject site is designated Open Space and Environmental Protection in the South of Division Road Secondary Plan. This proposal seeks to redesignate portions of the Open Space-designated area to Countryside Residential to accommodate the approximately 450-900 proposed residential units. The Draft Official Plan Amendment extends land use permissions within the Countryside Residential designation to include municipally serviced townhouse and stacked townhouse typologies with permissions for public servicing. By introducing a range of housing unit typologies (as indicated on the enclosed Draft Plan of Subdivision), development will pursue a phased

approach that responds to market and servicing demands in the area. The redesigned 18-hole golf course will remain Open Space, the existing natural heritage features will remain Environmental Protection. The floodplain associated with Silver Creek, and any other natural features identified on site, will also be designated to Environmental Protection.

Environmental Assessment will aid in determining capacity. At this time, the Draft Plan of Subdivision presents a range to be refined as servicing analysis progresses.

2.3.2 Draft Zoning By-law Amendment

The subject site is zoned Recreational Commercial Type Nine (C9-1/HR) in the Township of Severn Zoning By-law 2010-65. The C9 zone permits 'open air' recreational commercial uses, including golf courses. The C9 zone will remain in place for the portion of land to accommodate the redesigned golf course. Lands proposed to accommodate residential development will require a zoning by-law amendment to rezone lands to the following residential zones:

- Residential Type One (R1-XXX) to permit single-detached dwellings with site specific provisions;
- Multiple Residential Type One (RM1-XXX) to permit townhouse dwellings with site specific provisions;
- Multiple Residential Type Two (RM2-XXX) to permit stacked townhouse dwellings with site specific provisions.

The floodplain associated with Silver Creek, and any other natural features identified on site, will also be rezoned Environmental Protection.

2.3.3 Plan of Subdivision

A Plan of Subdivision will establish 69 blocks, including residential blocks, natural heritage blocks, park blocks, and stormwater management blocks. It also establishes thirteen new municipal roads. The Plan of Subdivision accommodates a total of approximately 450-900 units. The number of units to be accommodated within the proposed condominium block will be determined through the site plan process at time of development. The proposed number of residential units is currently presented in a range. This is dictated by the proposed servicing strategy. Servicing capacity will dictate the number of units that can ultimately be accommodated. A forthcoming Class

Figure 2 – Surrounding Area



3.0

LOCATION AND SURROUNDINGS

3.1 Subject Site

The subject site is located on the north side of Highway 11, between Uthhoff Line to the west and Burnside Line to the east. (Figure 1) The subject site is approximately 125 hectares in size with 890.5 metres of frontage along Uthhoff Line and 160 metres along Hurlwood Lane.

The subject site currently contains Hawk Ridge Golf Club, a 27-hole golf course facility including a driving range, clubhouse, parking lot, and maintenance/service buildings. A portion of the site is part of the Natural Heritage System, with Silver Creek and associated floodplain, as well as tributaries of Silver Creek.

The area proposed for redevelopment is approximately 60 hectares, which includes the Silver Creek corridor and Natural Heritage blocks which will not be redeveloped.

3.2 Surrounding Area

The subject site is surrounded by a mix of agricultural, residential, and forested lands (Figure 2). The residential components of the surrounding lands consist of generally large estate/rural lots backing onto the existing golf course. Given the complex property boundaries, the surrounding land uses identified are based on the general relative direction in relation to the site and include the following.

North: Directly north of the subject site contains a mix of rural agricultural land with a portion of Natural Heritage land bordering neighbouring properties and the subject site. These lands are identified as “Area 2” in the Secondary Plan and are intended for residential uses. (Figure 3).

East: Lands to the east include the Hawk Ridge Crescent neighbourhood which consists of large estate lots and is surrounded by the Hawk Ridge Golf Course on all sides. Additionally, lands further east along Burnside Drive consist of detached dwellings, a commercial spa, and the Township of Severn Municipal Office (Figures 4-5).

West: Lands to the west of the subject site include single-detached residential dwellings along the east side of Uthhoff Line and Natural Heritage lands on the west side of Uthhoff Line (Figure 6).

South: South of the subject site contains a mix of residential lots mixed with large rural lots north of Highway 11. The City of Orillia municipal boundary lies to the south, as well as the Inch Farm and Area 3 plans of subdivision (Figures 7).

Figure 3 – Lands to the North



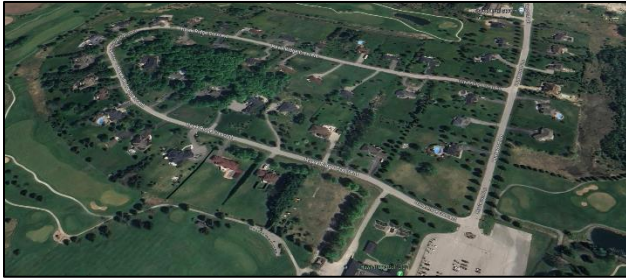
Source: Google Earth, 2024

Figure 4 – Lands to the East



Source: Google Earth 2024

Figure 5 – Lands to the East



Source: Google Earth, 2024

Figure 6 – Lands to the West



Source: Google Earth, 2024

Figure 7 – Lands to the South



Source: Google Earth, 2024

3.3 Future Development

The subject site is directly adjacent to two additional Plans of Subdivision: Inch Farm and Area 3 developments (**Figure 8**). Inch Farm is in the City of Orillia and received Draft Approval. It will introduce 351 residential units, a stormwater management pond, public parkland, environmental protection areas, a sanitary pumping station and public roads. The unit mix consists of single detached dwellings, street townhouses and common element condominium townhouses. Area 3 is in Township of Severn. It will introduce approximately 850 new residential units, parkland and retain golf course areas. Both Inch Farm and Area 3 are south of the subject site and will be accessed from a proposed new road between Uthhoff Line and Hurlwood Lane.

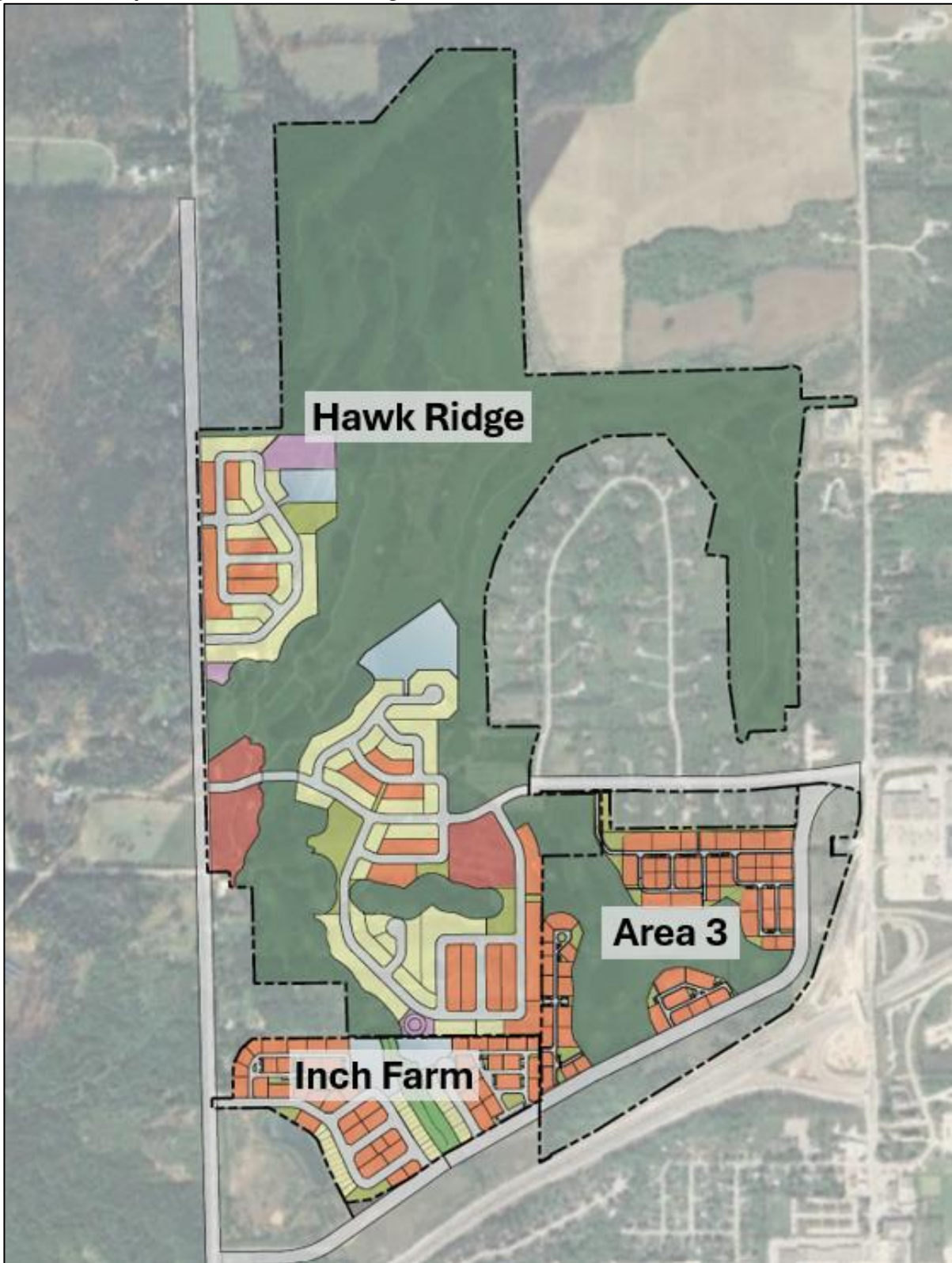
3.4 Transportation Network

3.4.1 Road Network

The subject site is serviced by rural and collector roads, with nearby access to a Provincial Highway (Highway 11) to the south. The site is accessed by Hurlwood Lane (Collector Road), which is connected to Burnside Line (Collector / Rural Road), which provides north-south connections as well as access to Highway 11. Additionally, the subject site has a secondary entrance from Uthhoff Line to the west.

From the main entrance at Hurlwood Lane, the subject site is 500 metres from Burnside Line and approximately 1.14 kilometres from Highway 11, which connects the site to the Greater Toronto Area (GTA) to the south and Gravenhurst and North Bay to the north. The City of Orillia is located on the opposite side of Highway 11 and is connected via an overpass.

Figure 8 – Composite Plan of Hawk Ridge, Inch Farm and Area 3



3.4.2 Active Transportation

Given the rural context, there are minimal existing active transportation options for accessing the subject site. Burnside Drive and Hurlwood Lane do not have sidewalks or paved shoulders for walking or cycling. To the north, Division Road includes paved shoulders for bicycle transportation.

Within the broader context, Uhthoff Trail (Trans Canada Trail) provides an active connection for walking, cycling, and hiking from Coldwater to Wilson Point. This 30-kilometer trail is open year-round. The trail passes through forests, wetlands, and waterfront vistas, making it an ideal route for nature enthusiasts. Additionally, the trail is well-maintained and offers opportunities for birdwatching and wildlife observation.

3.4.3 Transit Network

The nearby Orillia Square Mall, which is located approximately 800 metres from the subject site and is situated in the Township of Severn, is a critical transportation hub. As a key bus terminal, it connects transit users to a variety of destinations in the local area.

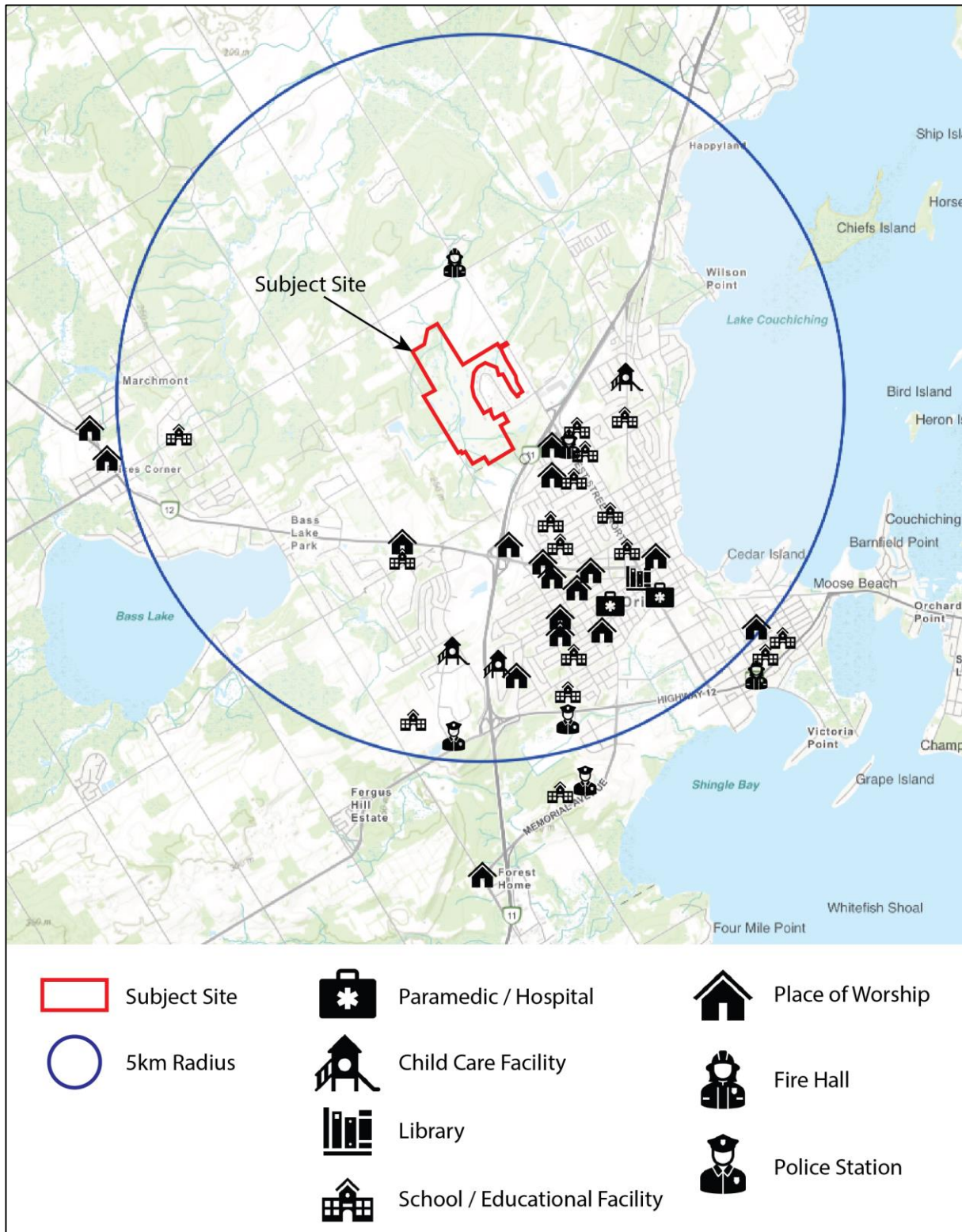
3.5 Public Service Facilities

The subject site is within a 4-kilometre radius of several key public service facilities (**Figure 9**). Although the majority of services and amenities are outside of Severn's municipal boundaries, the public services and facilities located within the Township of Severn in combination with the services and facilities in the City of Orillia can accommodate additional residents anticipated from the proposed development.

South of Highway 11, along West Street North, there are several Elementary and Secondary Schools within proximity to the site that are also accessible via current public transit routes. Within proximity to the subject site, there are a range of park and naturalized/forested areas including Grant's Woods Nature Reserve (protected by the Couchiching Conservancy) as well as Bass Lake Provincial Park located in Oro-Medonte.

Additionally, the subject site is well serviced by fire emergency services with Severn Fire Station 2 located at the intersection of Burnside Line and Division Road. The site is also serviced by medical emergency services as well as police through the Ontario Provincial Police.

Figure 9 – Public Service Facilities



4.0 Policy Context

4.1 Overview

The proposed development is supported by policy directions set out in the Planning Act (2024), Provincial Policy Statement (2020), Provincial Planning Statement (2024), Growth Plan for the Greater Golden Horseshoe (2020), County of Simcoe Official Plan (2023), Township of Severn Official Plan (2010), Council-adopted Township of Severn Official Plan (2022), and Council-adopted South of Division Road Secondary Plan (2022).

4.2 Planning Act (2024)

The Planning Act (“the Act”) is Ontario’s provincial legislation that governs land use planning, emphasizing sustainable economic development within a healthy environment. It provides the framework for preparing policy documents which guide provincial interests into municipal planning decisions, creating the basis for official plans, zoning bylaws, land divisions, and citizen involvement in planning proposals. It establishes streamlined planning processes and local planning administration.

4.2.1 Provincial Interest

Section 2 of the Planning Act outlines the matters of provincial interest which all municipal councils must have regard for when making decisions on planning matters. The matters of provincial interest are:

- (a) the protection of ecological systems, including natural areas, features and functions;*
- (c) the conservation and management of natural resources and the mineral resource base;*
- (e) the supply, efficient use and conservation of energy and water;*

- (f) the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;*
- (h) the orderly development of safe and healthy communities;*
- (j) the adequate provision of a full range of housing, including affordable housing;*
- (o) the protection of public health and safety;*
- (p) the appropriate location of growth and development;*
- (q) the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;*
- (r) the promotion of built form that,
 - (i) is well-designed,*
 - (ii) encourages a sense of place, and*
 - (iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;**
- (s) the mitigation of greenhouse gas emissions and adaptation to a changing climate*

The proposed development addresses the overall provincial interest has regard for the matters set out in Section 2 of the Act. The following is a high-level overview of how these considerations apply to the application and have been addressed.

The subject site, as identified, has Silver Creek running through the centre of the property. This corridor has been thoroughly examined, and a key component of the redevelopment will include the re-naturalization of this corridor. An Agricultural Impact Assessment has been prepared as part of the submission to ensure no negative impacts will be felt by neighbouring operations, however, no agricultural activities are currently operating on the subject property. The site has not been identified as having any natural or mineral resources, and the site has been substantially disturbed through the use as a golf course, limiting any opportunities for archaeological materials being found.

Through the engineering design, Low Impact Design (LID) measures will be incorporated to ensure that rainwater continues to be able to percolate into the aquifer. The full engineering design will ensure that there is adequate water, wastewater, and stormwater systems designed to support the development in a sustainable way, both environmentally and fiscally. The infrastructure will be designed and installed by LIV, with the

understanding that the Township will take ownership once the subdivision is assumed. The subject site is within an area that is a logical spot for growth as it is adjacent to an existing residential neighbourhood, the Township of Severn offices, as well as the City of Orillia's Urban Boundary. There are a number of community services, including schools, parks, trails, and commercial uses, within a short distance of the property.

Regarding housing, the proposed development includes a mix of single detached dwellings, townhouse dwellings, and stacked townhouse dwellings to provide options to address the needs of current and future populations. The proposed design will include sidewalks, as well as trails in the natural heritage block to support active transportation. The development will create a sense of place and will connect the proposed residential neighbourhoods to the surrounding communities.

Overall, the proposed development has regard for the matters of provincial interest as outlined above and will create a neighbourhood which is well integrated into the remainder of the Township.

4.3 Provincial Policy Statement (2020)

The Provincial Policy Statement (2020) ("PPS") provides overall direction on matters of provincial interest related to municipal planning decisions. The PPS was issued under Section 3 of the Planning Act, 1990 and provides provincial direction in terms of land use planning and development in Ontario. The current PPS was issued by the Province of Ontario and came into effect on May 1st, 2020. Decisions related to planning matters shall be consistent with the policies in the PPS.

4.3.1 Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns

1.1.1 Healthy, liveable and safe communities are sustained by:

a) promoting efficient development and land use patterns which sustain the financial

well-being of the Province and municipalities over the long term;

b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;

c) avoiding development and land use patterns which may cause environmental or public health and safety concerns;

d) avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas;

g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs; and

h) promoting development and land use patterns that conserve biodiversity.

The proposed development supports the creation of a healthy, liveable, and safe community through the efficient use of land that introduces a mix of residential dwelling typologies, protection and enhancements to natural heritage areas, and a redesigned golf course. Introducing single-detached, townhouses, and stacked townhouse dwellings ensures a mix of available housing options that increase and diversify the housing stock in the Township of Severn. Redevelopment of the existing golf course prioritizes conservation and improvement of the natural environment by reintroducing native species, protecting natural heritage features, and remediating negative impacts that have been caused by the existing golf course use. The proposed redevelopment also provides an opportunity for the creation of trails through the natural heritage system, providing additional public recreational opportunities which currently do not exist with the golf course being private lands.

The proposed development introduces 450-900 new residential units that creates a diverse range of housing and addresses the changing housing

needs of the current and future population. This encourages the intensification and redevelopment in appropriate locations to optimise land use, infrastructure, and public services while avoiding negative development patterns that further impact the natural heritage system. The proposed development focuses on introducing development patterns that enhance the natural features while promoting complete communities and walkability and providing access to greenspaces and naturalized areas.

4.3.2 Coordination

1.2.1 *A coordinated, integrated and comprehensive approach should be used when dealing with planning matters within municipalities, across lower, single and/or upper-tier municipal boundaries, and with other orders of government, agencies and boards including:*

- c) managing natural heritage, water, agricultural, mineral, and cultural heritage and archaeological resources; and*
- g) population, housing and employment projections, based on regional market areas.*

1.2.2 *Planning authorities shall engage with Indigenous communities and coordinate on land use planning matters.*

1.2.3 *Planning authorities should coordinate emergency management and other economic, environmental and social planning considerations to support efficient and resilient communities.*

Extensive coordination with key stakeholders has shaped the overall development plan, including staff from County of Simcoe and Township of Severn, Township of Severn Fire and Emergency Services, and Severn Sound Environmental Association. As part of the Archaeological Investigation process, the Chippewas of the Rama First Nation were engaged, and will continue to be engaged through the planning process to gather insights and guidance, ensuring that any cultural heritage features are examined appropriately. The design of the development includes two access points; one from Uthoff Line and one from Hurlwood Lane to ensure that there are multiple access points should one access become blocked. A comprehensive coordination approach fostered a development plan that aligns with environmental

and cultural values and ensures future residents' safety and well-being.

4.3.3 Housing

1.4.1 *To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:*

- a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through residential intensification and redevelopment and, if necessary, lands which are designated and available for residential development; and*

1.4.3 *Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:*

- d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed.*

The proposed development transforms an existing 27-hole golf course into a community with a mix of housing typologies surrounding a redesigned golf course. The proposal introduces residential uses in an area with limited existing housing options, allowing the Township of Severn to expand its housing supply. A mix of housing typologies will be introduced ranging in form and density, including detached, semi-detached, townhouse typologies. Proposed residential uses will have close access to amenities in the City of Orillia including grocery stores, shopping outlets, community facilities and more. Additionally, the development will incorporate active transportation infrastructure including trail networks, sidewalks and bike lanes, creating an active, walkable, and pedestrian-oriented residential environment.

4.3.4 Public Spaces, Recreation, Parks, Trails and open Space

1.5.1 *Healthy, active communities should be promoted by:*

- a) *planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity;*
- b) *planning and providing for a full range and equitable distribution of publicly accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;*
- d) *recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas.*

Although the subject lands are currently zoned to allow for open space uses, these are private open spaces, which are distinct from public open space uses as they are not available for use by all members of the public. Only those who are able to afford to, and who play golf, are permitted to access the site. The proposed development introduces new trail networks, providing public access to natural heritage features and the Silver Creek corridor. By reducing the 27-hole golf course to 18-holes, public access can be introduced to natural heritage areas that were previously reserved for private use. Park spaces have been thoughtfully integrated throughout the Plan of Subdivision to provide future residents with additional outdoor recreation space.

The development plan introduces sidewalks and bike lanes to foster active transportation and a walkable, active community. New road connections will be created between Uthoff Line and Burnside Line, and will be constructed to support active transportation, increasing the connectivity between these two roadways for pedestrians and cyclists. By blending development with nature, the plan aims to create an environment supporting human activity and ecological preservation.

4.3.5 Sewage, Water and Stormwater

1.6.6.1 *Planning for sewage and water services shall:*

- a) *accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing:*
 - 1. *municipal sewage services and municipal water services*
- b) *ensure that these systems are provided in a manner that:*
 - 1. *can be sustained by the water resources upon which such services rely;*
 - 2. *prepares for the impacts of a changing climate;*
 - 3. *is feasible and financially viable over their lifecycle; and*
 - 4. *protects human health and safety, and the natural environment;*
- c) *promote water conservation and water use efficiency;*
- d) *integrate servicing and land use considerations at all stages of the planning process; and*
- e) *be in accordance with the servicing hierarchy outlined through policies 1.6.6.2, 1.6.6.3, 1.6.6.4 and 1.6.6.5. For clarity, where municipal sewage services and municipal water services are not available, planned or feasible, planning authorities have the ability to consider the use of the servicing options set out through policies 1.6.6.3, 1.6.6.4, and 1.6.6.5 provided that the specified conditions are met.*

There are currently no municipal services available for the property, and the current golf course buildings are on private servicing systems. As part of the redevelopment of a portion of the site, municipal services will be installed, including a wastewater treatment facility, water treatment facility, and water tower. This infrastructure will be transferred to the municipality for ownership once completed. It will service the Hawk Ridge development, but through the servicing design, has ensured that there are still servicing options for the Area 2 lands in the future and the wastewater outlet (Silver Creek) will be able to accommodate any future out-letting without any negative impacts. Both systems will require approval through the Province's Class Environmental Assessment (EA) process.

1.6.6.7 *Planning for stormwater management shall:*

- a) *be integrated with planning for sewage and water services and ensure that systems are optimized, feasible and financially viable over the long term;*
- b) *minimize, or, where possible, prevent increases in contaminant loads;*
- c) *minimize erosion and changes in water balance, and prepare for the impacts of a changing climate through the effective management of stormwater, including the use of green infrastructure;*
- d) *mitigate risks to human health, safety, property and the environment;*
- e) *maximize the extent and function of vegetative and pervious surfaces; and*
- f) *promote stormwater management best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development.*

The development plans for the area are being carefully considered to ensure that the site's servicing needs are adequately met. Given the absence of municipal services in the area, the proposal includes the installation of a comprehensive wastewater treatment facility along with an onsite water treatment plant and water tower. The proposed system, designed with sustainability in mind, aims to effectively manage wastewater and support the residential development in a way that preserves the environment for future generations. The system has been designed such that the system can be expanded to accommodate Area 2 and Area 3, if required. The initiative will be further backed by a Class (EA) to ensure that all environmental and regulatory standards are met.

To achieve this, ongoing coordination with key stakeholders is underway. These stakeholders include the Township of Severn, the County of Simcoe, and relevant environmental agencies. Their input and collaboration are essential to navigate the regulatory landscape and address any environmental concerns that may arise. Additionally, this collaboration will help identify potential challenges early in the process, allowing for developing mitigation strategies to ensure the project's success. Through this approach, the development aims to provide a sustainable and well-serviced residential area that meets the needs of its future residents while adhering to all necessary environmental and regulatory requirements.

4.3.6 Natural Heritage

2.1.1 Natural features and areas shall be protected for the long term.

2.1.2 The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.

2.1.3 Natural heritage systems shall be identified in Ecoregions 6E & 7E1, recognizing that natural heritage systems will vary in size and form in settlement areas, rural areas, and prime agricultural areas.

2.1.6 Development and site alteration shall not be permitted in fish habitat except in accordance with provincial and federal requirements.

2.1.7 Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.

2.1.8 Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 2.1.4, 2.1.5, and 2.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.

The proposed residential development aims to enhance the area's natural heritage features. The land, previously disturbed by an extensive golf course, will undergo re-naturalization to support the regeneration and thriving of native species. This includes re-naturalizing the Silver Creek corridor, reintroducing native plant species to regenerate the land and wildlife, and redesigning the golf course to respect the area's natural features. The Silver Creek corridor will now act as a wildlife corridor through the proposed Hawk Ridge subdivision and the Inch Farm subdivision to the south, as well as the Area 3 subdivision to the southeast. Each of these developments are surrounded by natural areas which will provide habitat for any species in the area.

The development is proposed outside of any potential fish habitats and 30-metre buffers, as well as outside of any wetland features. It is recommended that the proposed road crossing of Silver Creek be a single span crossing and constructed so there are no impacts to the water inputs or to the channel itself. Some additional screening of fish habitats is proposed, however, all development is proposed outside of the buffer area, and it is therefore not anticipated that there will be any additional mitigation measures required.

Rare wildlife species were identified on site, including eastern wood-pewee, snapping turtles, and wood thrushes. Red-headed woodpeckers were also observed on the site, as well as a continuing review for the presence of Black Ash trees. The supporting EIS identifies that these species will not be impacted as their habitat was located onsite, and the development has an appropriate setback.

Landscaped areas will also be introduced throughout the Plan of Subdivision and will focus on the introduction of native plants. This approach aligns with the commitment to restoring and preserving the natural environment while providing valuable amenities for residents, ensuring a balance between growth and the natural environment.

4.3.7 Water

2.2.1 Planning authorities shall protect, improve or restore the quality and quantity of water by:

- d) identifying water resource systems consisting of ground water features, hydrologic functions, natural heritage features and areas, and surface water features including shoreline areas, which are necessary for the ecological and hydrological integrity of the watershed;*
- e) maintaining linkages and related functions among ground water features, hydrologic functions, natural heritage features and areas, and surface water features including shoreline areas;*
- g) planning for efficient and sustainable use of water resources, through practices for*

water conservation and sustaining water quality;

- i) ensuring stormwater management practices minimize stormwater volumes and contaminant loads, and maintain or increase the extent of vegetative and pervious surfaces.*

2.2.2 Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored.

Mitigative measures and/or alternative development approaches may be required in order to protect, improve or restore sensitive surface water features, sensitive ground water features, and their hydrologic functions.

The proposed residential redevelopment of a portion of the site is supported through a comprehensive review and design of the necessary water and wastewater civil infrastructure undertaken by Crozier. Additionally, the development is placing significant importance on the conservation of natural heritage and waterways, focusing on the maintenance and preservation of these ecological zones throughout the planning and construction phases. Extensive hydrogeological investigations have occurred to ensure that there is capacity in the water supply to accommodate the proposed development, as well as any future development of Area 2 and Area 3 lands which may require connections. The proposed wastewater system has been designed to ensure that there will be no impacts to the groundwater or surface water.

Summary

The planned project aligns with the Provincial Policy Statement by promoting effective land use, supporting infrastructure development, and adding diverse housing options. It also improves community spaces, parks, and walking paths and promotes eco-friendly methods for water management. The project also prioritizes the preservation of natural heritage and includes green spaces. Overall, it aligns with the PPS's objectives and policies for sustainable growth and preserving natural and community assets.

4.4 Provincial Planning Statement (2024)

The Provincial Planning Statement, 2024 (PPS 2024) is a streamlined province-wide land use planning policy framework that replaces both the PPS 2020 and the A Place to Grow Growth Plan for the Greater Golden Horseshoe while building upon housing-supportive policies from both documents. It is a policy statement issued under the authority of Section 3 of the Planning Act and will provide policy direction on matters of provincial interest related to land use planning and development as of October 20, 2024. Accordingly, decisions affecting planning matters shall be consistent with the PPS 2024.

Although similar policies exist in both the PPS 2020 and PPS 2024, the proposed application addressed the overall provincial interest and remains consistent with policies set out in the PPS 2024 including:

4.4.1 Housing

2.1 Planning for People and Homes

4. *To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:*
 - a) *maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and*
 - b) *maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.*
6. *Planning authorities should support the achievement of complete communities by:*
 - a) *accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses*

(including schools and associated child care facilities, longterm care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;

- b) *improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and*
- c) *improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.*

2.2 Housing

1. *Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:*
 - b) *permitting and facilitating:*
 1. *all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and*
 2. *all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;*
 - c) *promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation;*

Sections 2.1 and 2.2 of the Provincial Planning Statement (“PPS 2024”) provide policies and objectives to provide sufficient housing and ensuring developments are planned for people. These policies focus on maintaining a 15-year supply of residential land while encouraging the creation of complete communities that include a range of housing options varying in density.

To align with these planned policies, the proposed development introduces an appropriate range and mix of housing options to meet anticipated housing demands within Severn and the County of Simcoe. The proposed development introduces 450-900 units varying housing typologies which allows for the enhancement of Severn’s existing housing stock, as there will be a mix of detached, townhouse, and stacked townhouse typologies. This range of housing addressed the ever-changing social, health, economic, and demographic needs of current and future residents. This mix of housing also creates an accessible housing market for people in all stages of life. This will also assist the County and Township in having a 15-year supply of residential lands.

The proposed development allows for the intensification of lands by creating an overall density of approximately 20-40 units per net hectare in an area that can accommodate additional residential growth as the site is located near existing community facilities and services and near transportation routes that provide access to nearby services and higher-order transportation routes. Additionally, the intensification of the subject lands, the range of housing densities, development orientation, and the proposed development ensures an efficient use of land and resources.

4.4.2 Services and Infrastructure

3.1 General Policies for Infrastructure and Public Service Facilities

1. *Infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs. Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they:*
 - a. *are financially viable over their life cycle, which may be demonstrated*

through asset management planning;

- b. *leverage the capacity of development proponents, where appropriate; and*
- c. *are available to meet current and projected needs.*

3.6 Sewage, Water and Stormwater

1. Planning for sewage and water services shall: a

- a. *accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services;*
- b. *ensure that these services are provided in a manner that:*
 - (1) *can be sustained by the water resources upon which such services rely;*
 - (2) *is feasible and financially viable over their life cycle;*
 - (3) *protects human health and safety, and the natural environment, including the quality and quantity of water; and*
 - (4) *aligns with comprehensive municipal planning for these services, where applicable.*
- c. *promote water and energy conservation and efficiency;*
- d. *integrate servicing and land use considerations at all stages of the planning process;*
- e. *consider opportunities to allocate, and re-allocate if necessary, the*

- unused system capacity of municipal water services and municipal sewage services to support efficient use of these services to meet current and projected needs for increased housing supply; and*
- f. *be in accordance with the servicing options outlined through policies 3.6.2, 3.6.3, 3.6.4 and 3.6.5.*

With regard to servicing and infrastructure policies, the proposed development has thoroughly assessed the overall efficiency, life cycle, and long-term impacts of the proposed servicing. The development includes plans for the construction of a wastewater treatment plant that is designed to efficiently accommodate the proposed residential uses and also support future growth. The proposed water treatment plant, in combination with the proposed wastewater treatment facility, allows for the efficient use of infrastructure.

Similarly, regarding water servicing, the development proposes drilling additional wells and building a well house, treatment facility, and water tower to ensure a sustainable and reliable water supply for the community. By avoiding the need for cross-boundary connections, the development aims to promote efficient water servicing. These on-site water servicing solutions will optimise land use and ensure that the community's current and future water needs are met in an efficient and sustainable.

As previously outlined, the development will incorporate LID's into the design to ensure that there is as much infiltration as part of the stormwater management plan as possible. Two stormwater management ponds have been proposed, and will be designed in conjunction with our environmental consultants to ensure that the water that is outlet to Silver Creek has been thermally mitigated.

4.4.3 Recreation and Healthy Communities

3.9 Public Spaces, Recreation, Parks, Trails and Open Space

1. *Healthy, active, and inclusive communities should be promoted by:*

- a. *planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate active transportation and community connectivity;*
- b. *planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;*
- d. *recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas.*

The proposed development closely aligns with the policies set out in Section 3.9 of the PPS, 2024. The development promotes a healthy, active, and inclusive community by incorporating a range of public amenities and recreation opportunities. The development includes vast naturalized areas with integrated trail networks that provide people with easy access to natural amenities and activities. The proposed development uses roads that are intended to increase pedestrian and bicycle mobility with integrated bike lanes. These features help to foster social interaction and create a stronger sense of community while ensuring the site is designed for people of all ages with a range of public accessibility in mind.

These recreational features and naturalized areas also act as natural buffers from other surrounding uses. These buffers not only help to foster healthy communities but also reduce noise created from Uthoff Line and Burnside Line, which are both major transportation routes. Additionally, these natural buffers help to mitigate potential negative impacts on the environment and open spaces while ensuring the protection of key natural resources.

4.4.4 Natural Resources

4.1 Natural Heritage

1. *Natural features and areas shall be protected for the long term.*
2. *The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.*

4.2 Water

1. *Planning authorities shall protect, improve or restore the quality and quantity of water by:*
 - a. *using the watershed as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development;*
 - b. *minimizing potential negative impacts, including cross-jurisdictional and cross watershed impacts;*
 - c. *identifying water resource systems;*
 - d. *maintaining linkages and functions of water resource systems;*
 - e. *implementing necessary restrictions on development and site alteration to:*
 1. *protect all municipal drinking water supplies and designated vulnerable areas; and*
 2. *protect, improve or restore vulnerable surface and ground water, and their hydrologic functions;*
 - f. *planning for efficient and sustainable use of water resources, through practices for water*

conservation and sustaining water quality; and

- g. *ensuring consideration of environmental lake capacity, where applicable.*

The proposed development aims to protect and enhance the site's existing natural resources and features. By redeveloping a portion of the current golf course, we can shift our focus towards the long-term preservation and improvement of natural features on the site. This development presents an opportunity to convert the manicured golf course, ensuring the enhancement and protection of these natural areas. In addition, the proposed plans include the implementation of natural buffers, trail networks, and stormwater management ponds to improve the connectivity between the existing natural features.

A comprehensive Environmental Impact Study (EIS) has been completed in support of these applications to review the natural heritage features on the property, as well as to identify any Species at Risk (SARs) or species of interest on the property. Through the site investigations, it was determined that the development area is outside of the identified features and associated buffer areas. A best-practices plan to ensure that the natural features are protected during construction.

The proposed development will introduce stormwater management methods to safeguard the water resources and uphold overall water quality and erosion control. Thermal mitigation measures will be implemented to ensure that stormwater released into Silver Creek will not impact the water temperature of the coldwater creek. These measures, combined with the natural landscape, buffers, and drainage areas, will safeguard significant water courses within the site and prevent the spread of harmful or potentially polluted water to adjacent lands through waterways.

4.5 Growth Plan for the Greater Golden Horseshoe (2020)

The Growth Plan for the Greater Golden Horseshoe (“the Growth Plan”) was approved under authority of the *Places to Grow Act, 2005*, by the Lieutenant Governor in Council of the Province of Ontario and came into full force and effect on June 16th, 2006. The Growth Plan was further updated in May 2017, May 2019, and again on August 28th 2020. As of October 21st, 2024 the Growth Plan will be repealed, however, as this application has been submitted prior to that date, a review of the policies therein have been included. The Growth Plan provides a framework for managing growth in the Greater

Golden Horseshoe and includes direction on where and how to grow. The subject site is not within a settlement area identified in the Growth Plan, and is therefore considered to be greenfield development.

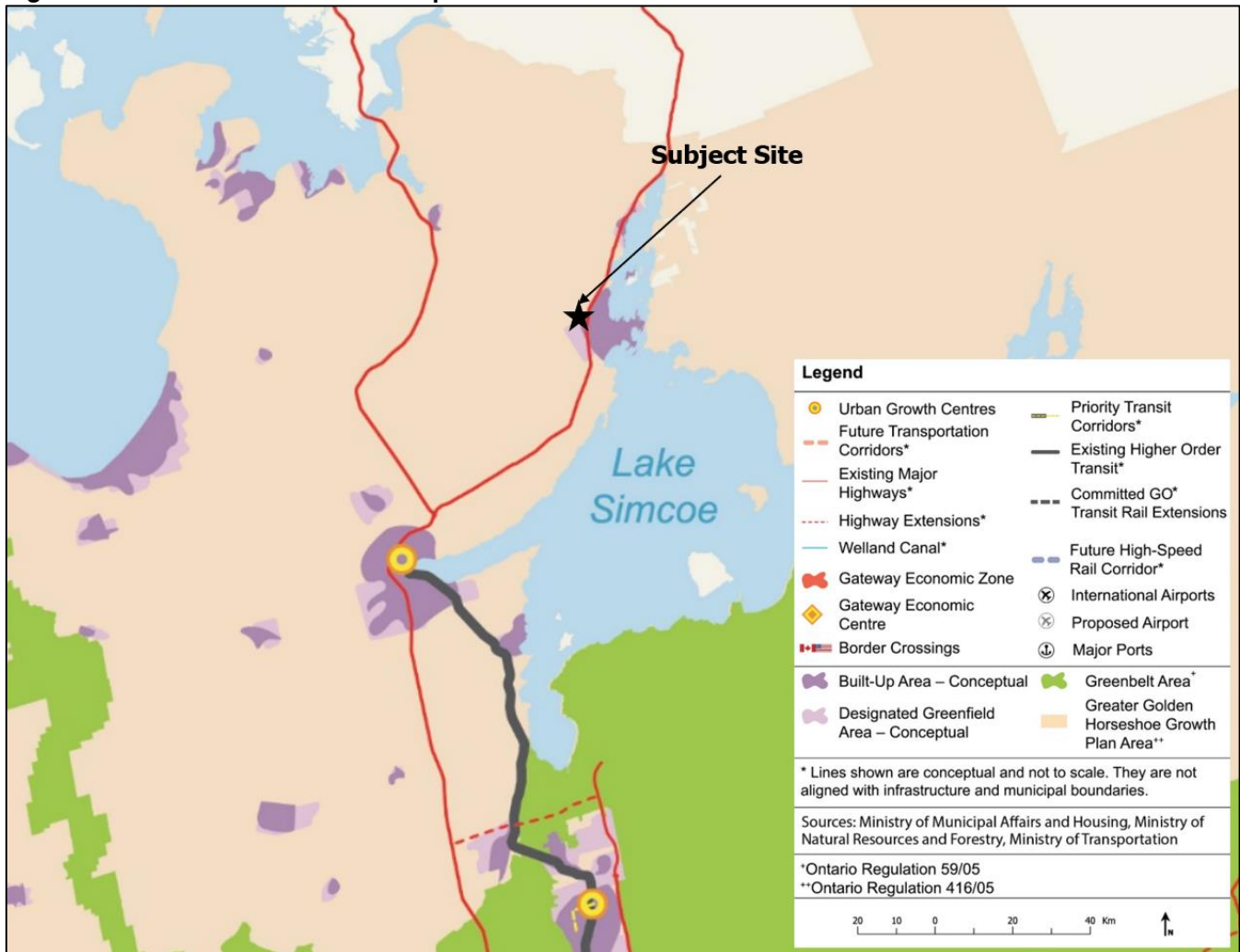
4.5.1 Growth

2.1.1 Managing Growth

4. Applying the policies of this Plan will support the achievement of complete communities that:

- a) feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services, and public service facilities;

Figure 10 – A Place to Grow Concept



- c) *provide a diverse range and mix of housing options, including additional residential units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes;*
- d) *expand convenient access to:*
 - iii. *an appropriate supply of safe, publicly-accessible open spaces, parks, trails, and other recreational facilities; and*
- e) *provide for a more compact built form and a vibrant public realm, including public open spaces;*
- g) *integrate green infrastructure and appropriate low impact development*

The proposed development incorporates a compact built form into a part of the Township that is underutilized from a housing perspective. The development will include a mix of single-detached, townhouse, and stacked townhouse dwellings to accommodate a range of housing needs. The transformation of a portion of the existing golf course into a residential development allows for a more significant opportunity to convert lands into publicly accessible open spaces, trails, and parks for residents and community members. This development focuses on promoting environmental management and sustainable growth by implementing green infrastructure (LID's) and other practices, such as bike lanes and interconnected trail networks, which help create a more vibrant and sustainable public realm, enhancing the overall livability of the community.

2.2.7 Designated Greenfield Areas

2. The minimum density target applicable to the designated greenfield area of each upper- and single-tier municipality is as follows:

- b) *The City of Kawartha Lakes and the Counties of Brant, Dufferin, Haldimand, Northumberland, Peterborough, Simcoe and Wellington will plan to achieve within the horizon of this Plan a minimum density target that is not less than 40 residents and jobs combined per hectare.*

The Subject Site is identified as greenfield lands within the Growth Plan for the Greater Golden Horseshoe. As outlined in Section 2.2.7 -

Designated Greenfield Areas of the Growth Plan, these lands must achieve a minimum of 40 combined residents and jobs per hectare. The density of the proposed redevelopment is approximately 40 persons and jobs per hectare. This classification aligns with the regional growth strategy to promote sustainable development, efficient land use, and the creation of complete communities with adequate infrastructure, surrounding amenities, and services that support the anticipated growth and development.

4.5.2 Housing

2.2.6 Housing

2. Notwithstanding policy 1.4.1 of the PPS, 2020, in implementing policy 2.2.6.1, municipalities will support the achievement of complete communities by:

- a) *planning to accommodate forecasted growth to the horizon of this Plan;*
- b) *planning to achieve the minimum intensification and density targets in this Plan;*
- c) *considering the range and mix of housing options and densities of the existing housing stock; and*
- d) *planning to diversify their overall housing stock across the municipality.*

3. To support the achievement of complete communities, municipalities will consider the use of available tools to require that multi-unit residential developments incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes.

To support the creation of a complete community, the proposed development is thoughtfully aligned with the policies outlined in Section 2.2.6 of the Growth Plan. The project introduces an overall density of 20-40 units per net hectare (developable area), offering a diverse mix of housing options, including single-detached homes, semi-detached homes, and townhouses (Golf Villas). This varied housing mix not only enhances the existing housing stock within the Township of Severn but also diversifies it to meet the needs of people at different life stages. By doing so, the development contributes to a more inclusive and adaptable community.

4.5.3 Transportation

3.2.2 Transportation – General

3. In the design, refurbishment, or reconstruction of the existing and planned street network, a complete streets approach will be adopted that ensures the needs and safety of all road users are considered and appropriately accommodated.

The proposed development incorporates a thoughtfully designed road network that prioritizes protecting and preserving natural heritage features, watercourses, and other significant natural resources within the subject site. The development emphasizes creating complete streets, including bike lanes and pedestrian-friendly pathways, ensuring a strong focus on transportation and accessibility throughout the site. Additionally, integrating trail networks across the area facilitates efficient, active transportation methods, offering enhanced accessibility for all residents. These trails and complete streets network promote a healthier, more sustainable lifestyle and provide residents convenient access to naturalized spaces, fostering a deep connection with the surrounding environment. The overall design carefully balances development and environmental stewardship, creating a harmonious living space supporting community needs and ecological preservation.

4.5.4 Water

3.2.6 Water and Wastewater Systems

2. Municipal water and wastewater systems and private communal water and wastewater systems will be planned, designed, constructed, or expanded in accordance with the following: a) opportunities for optimization and improved efficiency within existing systems will be prioritized and supported by strategies for energy and water conservation and water demand management;

c) a comprehensive water or wastewater master plan or equivalent, informed by watershed planning or equivalent has been prepared to:

i. demonstrate that the effluent discharges and water takings associated with the system will not

negatively impact the quality and quantity of water;

ii. identify the preferred option for servicing growth and development, subject to the hierarchy of services provided in policies 1.6.6.2, 1.6.6.3, 1.6.6.4 and 1.6.6.5 of the PPS, 2020, which must not exceed the assimilative capacity of the effluent receivers and sustainable water supply for servicing, ecological, and other needs; and

iii. identify the full life cycle costs of the system and develop options to pay for these costs over the long-term.

d) in the case of large subsurface sewage disposal systems, the proponent has demonstrated attenuation capacity;

The proposed development will include a municipal wastewater treatment plant, and an onsite water treatment plant and water tower strategically located within the subject site to meet current and future demands. Pervious surfaces will be prioritized in construction to enhance sustainability by allowing water to naturally infiltrate the ground, reducing runoff, and recharging groundwater supplies. Where feasible, LID measures will be implemented to ensure that the stormwater is allowed to percolate into the aquifer. These water and wastewater management methods support long-term sustainability, adhere to environmental standards, and ensure that development is integrated with natural resource conservation. These methods support long-term sustainability, meet environmental standards, and integrate development with natural resource conservation.

3.2.7 Stormwater Management

2. Proposals for large-scale development proceeding by way of a secondary plan, plan of subdivision, vacant land plan of condominium or site plan will be supported by a stormwater management plan or equivalent, that:

a) is informed by a subwatershed plan or equivalent;

b) incorporates an integrated treatment approach to minimize stormwater flows and

reliance on stormwater ponds, which includes appropriate low impact development and green infrastructure;
c) *establishes planning, design, and construction practices to minimize vegetation removal, grading and soil compaction, sediment erosion, and impervious surfaces; and d) aligns with the stormwater master plan or equivalent for the settlement area, where applicable.*

The proposed development seeks to reintroduce naturalized landscaping to the site, which has been significantly modified to serve the current golf course. This development focuses on preserving and enhancing the natural watercourse within the site, thereby optimizing water catchment and reducing the need for stormwater management ponds. While some existing vegetation will be removed to make way for residential blocks, the primary vegetation affected consists of the "lawn-type" landscaping of the golf course, which demands high water usage and maintenance. Despite a reduction in the site's overall impervious surface, the additional naturalization of heritage features and the watercourse will significantly improve stormwater management and contribute to a more sustainable landscape.

4.5.5 Natural Resources

4.2.1 Water Resource Systems

1. Upper- and single-tier municipalities, partnering with lower-tier municipalities and conservation authorities as appropriate, will ensure that watershed planning is undertaken to support a comprehensive, integrated, and long-term approach to the protection, enhancement, or restoration of the quality and quantity of water within a watershed.

2. Water resource systems will be identified to provide for the long-term protection of key hydrologic features, key hydrologic areas, and their functions.

3. Watershed planning or equivalent will inform:

a) the identification of water resource systems;

b) the protection, enhancement, or restoration of the quality and quantity of water;
c) decisions on allocation of growth; and
d) planning for water, wastewater, and stormwater infrastructure.

In order to protect valuable natural resources, we have placed great importance on preserving and safeguarding water features on the subject site. As a result, 30-meter buffers have been incorporated into the site's design around water courses to reduce excess runoff and minimize pollutants entering the watershed. The long-term protection of water resources is a crucial element in the overall site layout.

Residential development areas have been strategically placed in specific areas of the site to maximize the protection of valuable natural heritage resources, such as the existing watercourses, woodlands, and habitat of species at risk. Additionally, by protecting and preserving these key features, we can enhance them over time, as they will remain untouched by development and buffered significantly for protection.

4.2.2 Natural Heritage System

1. A Natural Heritage System for the Growth Plan has been mapped by the Province to support a comprehensive, integrated, and long-term approach to planning for the protection of the region's natural heritage and biodiversity. The Natural Heritage System for the Growth Plan excludes lands within settlement area boundaries that were approved and in effect as of July 1, 2017

3. Within the Natural Heritage System for the Growth Plan:

a) new development or site alteration will demonstrate that:

i. there are no negative impacts on key natural heritage features or key hydrologic features or their functions;

ii. connectivity along the system and between key natural heritage features and key hydrologic features located within 240 metres of each other will be maintained or, where

possible, enhanced for the movement of native plants and animals across the landscape;

iii. the removal of other natural features not identified as key natural heritage features and key hydrologic features is avoided, where possible. Such features should be incorporated into the planning and design of the proposed use wherever possible;

iv. except for uses described in and governed by the policies in subsection 4.2.8, the disturbed area, including any buildings and structures, will not exceed 25 per cent of the total developable area, and the impervious surface will not exceed 10 per cent of the total developable area;

v. with respect to golf courses, the disturbed area will not exceed 40 per cent of the total developable area; and

vi. at least 30 per cent of the total developable area will remain or be returned to natural self-sustaining vegetation, except where specified in accordance with the policies in subsection 4.2.8; and

4. Provincial mapping of the Natural Heritage System for the Growth Plan does not apply until it has been implemented in the applicable upper- or single-tier official plan. Until that time, the policies in this Plan that refer to the Natural Heritage System for the Growth Plan will apply outside settlement areas to the natural heritage systems identified in official plans that were approved and in effect as of July 1, 2017.

6. Beyond the Natural Heritage System for the Growth Plan, including within settlement areas, the municipality:

- a) will continue to protect any other natural heritage features and areas in a manner that is consistent with the PPS; and
- b) may continue to protect any other natural heritage system or identify new systems in a manner that is consistent with the PPS.

The submission to support the proposed redevelopment of the site has completed extensive evaluation on its potential impact on the key natural features present on the site. The design of the site incorporates substantial buffers around significant natural elements, such as water features and naturalized areas, demonstrating a commitment to preserving these essential aspects. Ensuring the protection and functionality of these natural features, the plan emphasizes the significance of maintaining connectivity between them. Additionally, a considerable portion of natural heritage features are set to be conserved within the developable area and throughout the golf course. This approach facilitates the establishment of connectivity among these features, ultimately enabling the seamless integration of residential areas within the site, all while safeguarding the existing natural features from any adverse effects.

4.5.6 Open Spaces

4.2.5 Open Space

1. Municipalities, conservation authorities, non-governmental organizations, and other interested parties are encouraged to develop a system of publicly-accessible parkland, open space, and trails, including in shoreline areas, within the GGH that:
 - a) clearly demarcates where public access is and is not permitted;
 - b) is based on a co-ordinated approach to trail planning and development; and
 - c) is based on good land stewardship practices for public and private lands.

The proposed development offers an opportunity to create accessible public open spaces for both current and future residents. This residential development will be integrated into an area that features a large amount of natural heritage, woodlands, forested areas, and water features. This integration will provide residents with access to a variety of natural outdoor spaces, enhancing the overall livability of the community. Additionally, the development includes an integrated trail network that serves as a connection for active and accessible transportation, while also ensuring the preservation of the natural lands. Furthermore, the existing golf course will undergo re-naturalization, including the enhancement of natural features and the creation of significant buffers.

4.2.9 Culture of Conservation

1. Municipalities will develop and implement official plan policies and other strategies in support of the following conservation objectives:

- a) water conservation, including through:
 - i. water demand management for the efficient use of water; and
 - ii. water recycling to maximize the reuse and recycling of water;

With many water features throughout the site, water management and conservation are a significant part of the site's design. The use of stormwater management ponds and other habitat/natural ponds helps manage stormwater runoff from the impervious surfaces of the proposed development. Additionally, the natural watercourse that runs through the entirety of the site helps to manage stormwater overflow while acting as a method for water transportation off the site. While the existing golf course includes large amounts of previous surfaces from the grasses and lawn areas, these are not long-term sustainable methods for water catchment and groundwater recharge. While the existing golf course has large grass and lawn areas, these do not effectively capture and recharge groundwater in the long term. By restoring many natural heritage features, we can improve water collection and recycling across the site. Additionally, the engineering design will include LIDs which will allow for increased stormwater absorption and groundwater recharge.

Summary

The proposed development is consistent with the Growth Plan by supporting strategic growth, providing diverse housing options, and enhancing transportation connectivity. It optimizes land use near existing transportation connections, creating a more sustainable and efficient transportation network. The project incorporates effective water management practices, aligning with the plan's focus on environmental sustainability. Additionally, the development prioritizes creating and preserving open spaces and promoting a balanced and livable community.

4.6 County of Simcoe Official Plan (2023 Consolidation)

The County of Simcoe Official Plan (SOP) and amendments were approved by the Ministry of Municipal Affairs and Housing (MMAH) and Local Planning Appeal Tribunal (LPAT)/Ontario Land Tribunal (OLT) in December 2016. Since then, the County's Official Plan has been amended and updated, with its most recent Office Consolidation completed in February 2023. The County's Official Plan Amendment No. 7, which is their first phase in their Municipal Comprehensive Review (MCR) process was adopted by Council in October, 2022 to update growth allocations to the local level municipalities and to direct growth. This amendment is still waiting for final approval by the Ministry before it will come into full force and effect.

The SOP guides growth management in a rapidly expanding county over the next 20 years, which aligns with the amended Growth Plan. It balances economic development, community building, and environmental conservation while fostering coordinated planning with neighbouring municipalities, agencies, and government bodies.

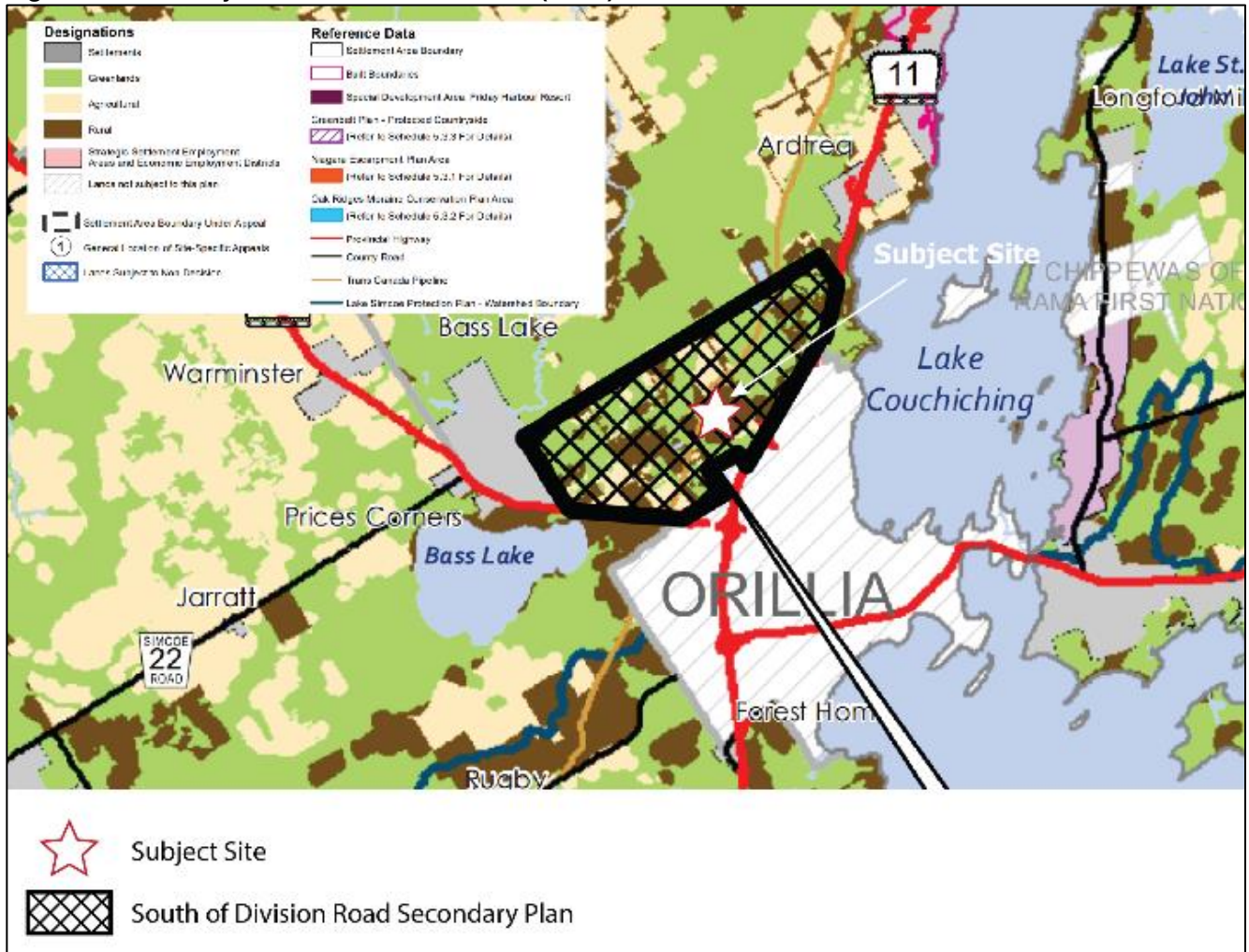
4.6.1 Growth Management

3.1 Growth Management Strategy

3.1.3 Protection and enhancement of the County's natural heritage system and cultural features and heritage resources

Given the existing conditions of natural resources within this area, the proposed development aims to balance economic growth and environmental protection. To reduce conflicts between land uses, appropriate consideration was given to the overall layout and site design to ensure natural resources are protected while development is optimized and laid out efficiently.

Figure 11 - County of Simcoe Official Plan (2023)



Natural resources such as watercourses, ponds, forested areas, and other greenspaces have been retained while incorporating compact, efficient residential development on site areas with the lowest impact on the surrounding environment. Additionally, from the developable area of the subject site, the development introduces an overall density of 21-40 units per hectare, while still accommodating and ensuring natural resources are protected.

4.6.2 Accommodating Growth

3.2 Population and Employment Projections/Allocations

3.2.2 The County, in collaboration with the local municipalities, will review the population and

employment forecasts, in conjunction with any reviews undertaken by the Province. If necessary, any revisions to the forecasts, including the local municipalities' allocations, will require an amendment to this Plan and will only be considered as part of a municipal comprehensive review.

3.2.5 This Plan recognizes that certain types of development will occur outside of settlement areas

3.2.8 The County will manage the approvals of planning applications for which the County is the approval authority, and direct the local municipalities to manage the approvals of planning applications for which they are the approval authority, to provide for an appropriate range of housing types and densities including affordable housing, to meet

the population projections in keeping with the population/employment allocations to the local municipalities as detailed in Table 1 and the density targets and intensification targets as outlined in Section 3.5.

3.7.13 Development in the South of Division Road Secondary Plan area shall occur in accordance with the policies of the Township of Severn's South of Division Road Secondary Plan as approved.

Based on the anticipated population and employment growth within the County of Simcoe, the proposed development will help to ensure that housing needs are met on the local level while also contributing to housing growth within the County. Although the subject site is outside of a designated settlement area, within this policy, the County permits some growth and development outside of settlement areas to help achieve their targets.

The growth targets provided by the Ministry in the Growth Plan are only minimums, and there is encouragement for municipalities to achieve, and exceed, the growth targets provided.

The allowance to redevelop a portion of these lands for residential purposes will assist the County in achieving, and possibly exceeding, their growth targets. It is also important to note that the development of the Hawk Ridge lands will not impact the development of other lands within the South of Division Road Secondary Plan Area, or other lands within settlement areas identified in the SOP from developing. The development of these lands is within a logical area for development and will not impact the orderly development of the Township.

To ensure that these lands and the surrounding area are optimized, redevelopment has been discussed with the Township of Severn and Simcoe County extensively to ensure that all aspects of the plan were thoroughly evaluated and any concerns addressed. It was determined that the Subject Site is within a strategic location for redevelopment for residential purposes given the proximity to major transportation corridors (Highway 11), commercial nodes, institutional uses, and the City of Orillia. The Township of Severn has recognized the potential for growth and development in this area, and discussions have taken place to explore the subject

site's ability to accommodate the increasing residential needs of the community.

Additionally, to support a diverse range of housing to accommodate the needs of individuals, the proposed development includes a mix of single detached, townhouse, and stacked townhouse dwellings to help meet County growth targets.

With regard to Section 3.7.13, which states that development within the South of Division Road Secondary Plan, those policies will be reviewed further in this report. This policy, however, identifies that the policy set which directs development in this area is the responsibility of the Township. This ensures that the Township's vision for this area can be achieved. It is important that the proposed development complies with the intent of the SOP, and it our opinion it does meet the intent.

4.6.3 Housing

4.1 Healthy Communities and Housing Development

The development of complete and healthy communities is a priority of this Plan, to be achieved by the following policies:

4.1.2 Accessibility of education, health, human services, culture, and recreation facilities by walking, cycling, or transit is encouraged.

4.1.3 The County encourages the provision of a full range and equitable distribution of publicly accessible built and natural settings for recreation, including parkland, open space, trails, and water-based facilities.

4.1.6 Local municipalities will provide for an appropriate range of housing types and densities required to meet projected needs of current and future residents.

4.1.7 Local municipalities shall make available: sufficient quantity of housing, taking into account demand to improve choice; and, housing development in suitable locations, which offers a good range of public service facilities and proximity to jobs, key services, and infrastructure, recognizing the needs and abilities of all residents.

The proposed development plan for the Hawk Ridge Golf Course aims to create a complete community that supports active transportation and protects natural heritage resources. This development focuses on prioritizing sustainable growth and development in an area that boasts excellent access to local and County roads, as well as Provincial highways, commercial spaces, community facilities, and natural open spaces. The redevelopment will create publicly accessible parklands along the Silver Creek corridor, as well as roads designed with pedestrian and cyclist safety in mind. The location of the property on the edge of the City of Orillia positions itself to be walkable and bikeable to commercial plazas and schools. The proposed residential development has been designed to ensure connections to existing draft plan approved subdivisions to the south (Inch Farm and Area 3) ensuring that there is connectivity, further encouraging active transportation options.

One of the key objectives of the proposed development is to ensure that both current and future residents have ample access to a diverse range of housing options. The proposal includes a mix of single-detached, townhouse, and stacked townhouse dwellings. This will support a range of housing needs and incomes to be accommodated in the community. The range in housing types will allow future residents to age in place in their community.

This plan will add to the housing stock available in the Township to accommodate their projected growth. The location of the site has good access to public services, employment opportunities, and essential infrastructure. It is designed to address the needs of all residents and aims to foster a thriving and inclusive community for everyone.

4.6.4 Natural Heritage Resources and the Environment

Water

4.5.1 Land use planning and development within the County shall protect, improve or restore the quality and quantity of water and related resources and aquatic ecosystems on an integrated watershed management basis.

4.5.4 Development in the County shall occur in a manner that will protect human life and property

from water related hazards such as flooding and erosion. Flood plain management shall occur on a watershed management basis giving due consideration to the upstream, downstream, and cumulative effects of development.

4.5.7 Local municipalities shall ensure that stormwater management practices match pre development stormwater flow rates and where possible, minimize flow rates, minimize containment loads, and where feasible maintain or increase the extent of vegetative and pervious surfaces.

Air Quality

4.5.42 This Plan promotes improved air quality through land use development patterns that promote compact and mixed use development, transit usage where appropriate, alternative transportation and active transportation systems, and forest management and reforestation efforts as a means of fostering maintenance and improvement of air quality. The County will work in co-operation with the appropriate agencies to assist in the maintenance and improvement of air quality in the County.

Energy Conservation and Renewable Energy

- a. 4.5.43 The County will promote energy conservation through land use development patterns that: promote compact, mixed use development;*
- b. promote active transportation and the use of transit;*
- c. maximize, where appropriate, the use and production of alternative energy systems or renewable energy systems, such as solar, wind, biomass or geothermal energy; and*
- d. maximize the use of existing natural areas and newly planted vegetation to reduce the urban heat island effect.*

To further align with environmental conservation policies set out in the County's Official Plan, the proposed development ensures the protection of key natural heritage resources with sufficient buffers from development. These buffers help protect key features while improving the quality over time, as they are not faced with the stresses of the surrounding development. An additional method of protection comes from the implementation of

stormwater management practices. Incorporating a stormwater management pond while retaining a large number of porous surfaces allows for long-term stormwater retention and helps improve the naturalized areas' overall quality.

In addition to water management, the site's overall design and layout help improve air quality and promote energy conservation. By providing a mix of housing ranging in densities, a more compact development allows for greater retention and enhancement of naturalized spaces, ultimately helping to improve the overall air quality, reduce urban heat island impacts from the development, and provide residents with access to outdoor spaces.

4.6.5 Infrastructure

4.7 Infrastructure: Sewage and Water Services

4.7.5 Where full municipal sewage services and municipal water services are not provided, municipalities may allow the use of private communal water services and private communal sewage services.

4.7.6 Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not provided and where a study concludes that the provision of full municipal sewage services and municipal water services or private communal sewage services and private communal water services cannot be implemented, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts. In settlement areas, these services may only be used for infilling or minor rounding out of existing development.

4.7.9 Planning for sewage and water services shall:

- a. direct and accommodate expected growth or development in a manner that promotes the efficient use and optimization of existing services;*
- b. ensure that the systems are provided in a manner that can be sustained by the water resources upon which such services rely; is feasible, financially viable and complies*

with all regulatory requirements; and protects human health and the natural environment;

- c. promote water conservation and water use efficiency;*
- d. integrate servicing and land use consideration at all stages of the planning process; and*
- e. be in accordance with the servicing hierarchy outlined in the policies above.*

To align with the policies set out in section 4.2 of the Simcoe County Official Plan, the proposed development implements efficient on-site servicing systems for water and sewage. An accompanying study has been conducted to ensure the serving implemented will be sufficient to accommodate for the proposed development. By creating an efficient and more densely designed development, this provides the opportunity for cost-effective servicing to be constructed to serve current residents while also being able to accommodate future growth within the area.

The implementation of efficient on-site servicing systems for water and sewage is in line with the plan, which aim to minimize the strain on existing infrastructure and resources. The proposed systems will become part of the municipal sewage and water infrastructure, therefore enhancing the overall municipal infrastructure and creating additional opportunities for sustainable growth within this area of Severn. Additionally, this approach supports the overall environmental sustainability of the area, as it reduces the demand on centralized water and sewage systems and encourages more responsible use of resources. This proactive strategy not only benefits the immediate community but also positions the development to contribute positively to the long-term environmental and economic well-being of the County.

Summary

The proposed development aligns with the County of Simcoe Official Plan by supporting strategic growth management and accommodating growth within strategic areas. It provides a range of housing options to meet diverse community needs, contributing to a balanced and inclusive housing market. The project preserves and enhances

natural heritage resources, reflecting the County's commitment to environmental protection. Additionally, it integrates infrastructure planning with growth management, ensuring sustainable service delivery and efficient use of resources. Overall, the development conforms to the County's vision for sustainable growth, environmental stewardship, and community well-being.

4.7 Township of Severn Official Plan (2010)

The Township of Severn Official Plan (TSOP) was approved by the County of Simcoe on April 25, 2006 and was ultimately approved by the Ontario Municipal Board on June 11, 2010. The purpose of the TSOP is to create a vision which will guide development and growth for the Township over the long-term. The policies in the TSOP build on those

in the SCOP, emphasising a local approach and vision of how to grow the community.

4.7.1 Natural Heritage

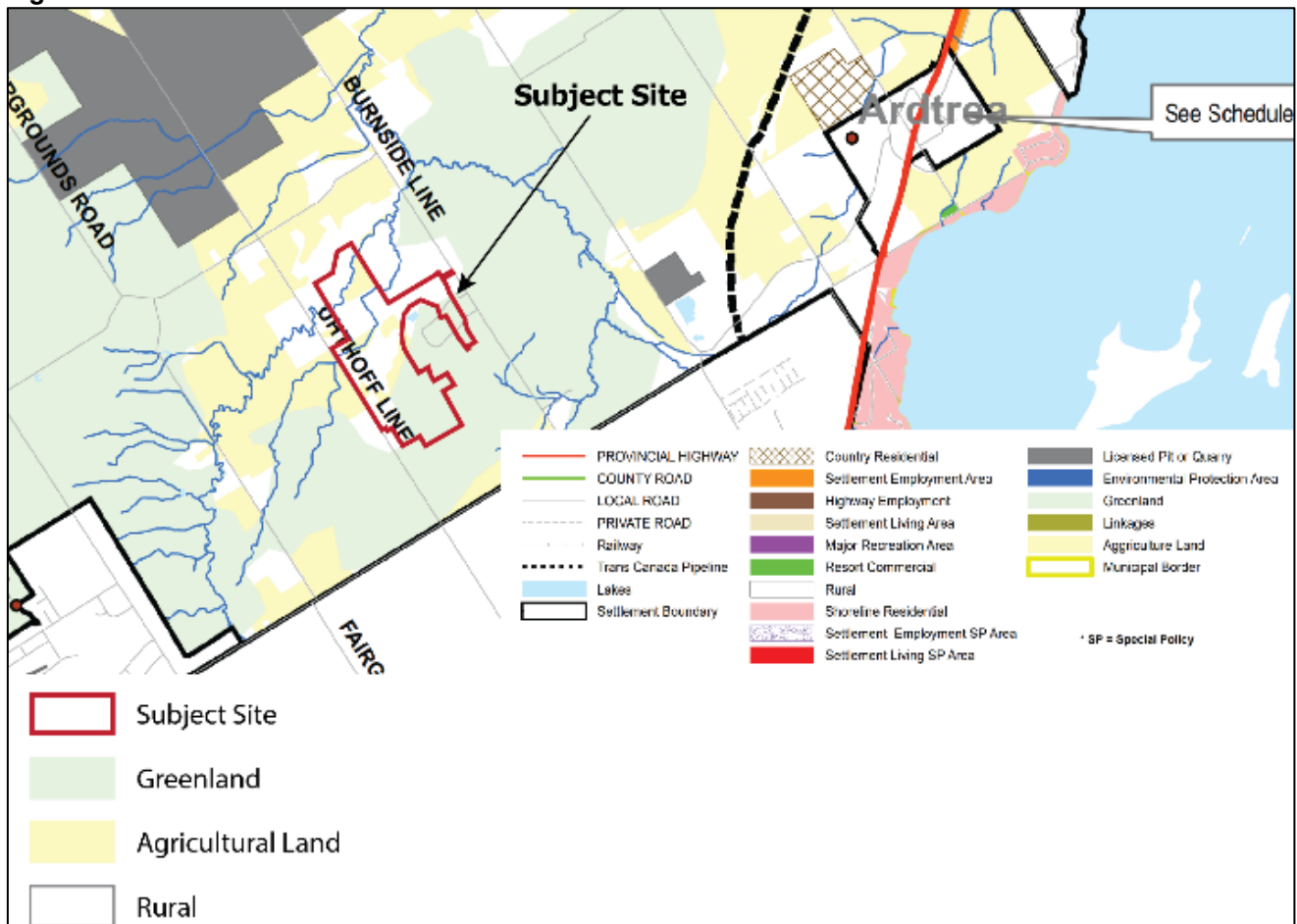
A2.1 NATURAL HERITAGE

A2.1.1 Goal It is the goal of this Plan to protect and enhance significant natural heritage features and ecological functions in the Township.

A2.1.2 Objectives

- a) *To ensure that the protection of significant environmental features and their associated ecological functions is considered in all land use decisions.*
- b) *To ensure that a thorough understanding of the natural environment, including the values, opportunities, limits and constraints that it provides, guides land use decision-making in the Township.*

Figure 12 – Schedule A – South Land Use



- c) *To require that land use planning contributes to the protection, improvement or restoration of water and related resources and aquatic ecosystems on an integrated watershed management basis.*
- d) *To minimize potential negative impacts to the water quality and hydrological and hydrogeological characteristics of sensitive surface water features and sensitive groundwater features.*
- e) *To not permit development or site alteration within significant habitat of endangered species and threatened species, within significant wetlands or within significant coastal wetlands.*
- f) *Development and site alteration shall not be permitted within significant woodlands, significant valleylands, significant wildlife habitat or significant areas of natural and scientific interest unless it can be demonstrated that such development or site alteration will not have a negative impact on the relevant feature or its ecological function.*
- g) *To protect, improve or restore surface and groundwater resources in sufficient quality and quantity to meet existing and future needs on a sustainable basis.*
- h) *The Township shall protect, improve or restore the quality and quantity of water by:*
 - i. *promoting the efficient and sustainable use of water resources, including practices for water conservation and sustaining water quality, and*
 - ii. *maintaining linkages and related functions among surface water features, ground water features, hydrologic functions and natural heritage features and areas.*
- i) *The Township generally seeks to protect other natural heritage features which are not found to be significant. The merits of protection of these features relative to the merits of development or site alteration shall be assessed on a case-by-case basis through completion of an Environmental Impact Study and, if applicable, consideration of any proposed means of*

mitigation, remediation and possible ecological enhancements

The proposed development aligns with the goals and objectives related to protecting and enhancing natural heritage resources, as outlined in section 2.1 of the Seven Official Plan (2010). The proposed development focuses on residential development while retaining and enhancing key natural features within the landscape, as the existing golf course includes large amounts of forested areas, watercourses, and other naturalized landscapes. Full season studies have been conducted to identify natural features on the site. These seasonal investigations have identified habitats of species at risk, and the preservation of habitat has been incorporated into the design. Part of the site design includes the naturalization of the floodplain area to create a natural habitat, and to provide vegetative cover for Silver Creek, which is a coldwater stream, which will assist with thermal mitigation.

The development carefully considers the location of these existing natural features and minimizes the overall negative impact by maintaining appropriate buffers from the features and proposing residential only outside of the required buffers. The proposal will increase the naturalized plantings through the Silver Creek corridor which are currently manicured lawn as part of the golf course.

4.7.2 Growth and Settlement

A2.2 GROWTH AND SETTLEMENT

A2.2.1 Goal

It is the goal of this Plan to direct most forms of development to settlement areas where full wastewater and water services are available, or the community has developed as a settlement area and to support the efficient use of land in these areas.

A2.2.2 Objectives

- a) *To encourage the establishment of an optimum balance between residential and non-residential assessment in the Township.*
- b) *To ensure that all development is appropriately phased and in conjunction with required infrastructure improvements where appropriate.*
- c) *To ensure that the use of existing infrastructure and public service facilities*

should be optimized, wherever feasible, before consideration is given to developing new infrastructure and public service facilities.

- d) *Impacts from any new or expanding non-agricultural uses on surrounding agricultural operations and lands should be mitigated to the extent feasible.*

Township Council in April 2023 passed a resolution which requested that the Province, through their approval of the County of Simcoe's Official Plan Amendment 7 to identify the South of Division Road Secondary Plan area, and these lands in particular, as a settlement area. Although the Province has yet to approve the County's Official Plan, Council has identified that this area is an appropriate location for growth, given the proximity to existing services and the existing transportation network. The proposed development aims to address the need for balanced growth and community requirements in a non-settlement area. This development plan outlines various key aspects, including residential growth, infrastructure optimization, and environmental impact assessment. The proposed development focuses on ensuring efficient and sustainable residential growth by offering a diverse range of housing options in terms of size and density. These options are tailored to meet the needs of current and future residents, promoting inclusivity and diversity within the residential community.

An essential aspect of the proposed development is the optimization of infrastructure. This includes the implementation of new comprehensive water and wastewater facilities which can accommodate the proposed growth. As is shown in the Master Servicing Report, the system will not impact the ability of the Area 2 lands to develop in the future and may be able to be accommodated in these proposed systems. These infrastructure upgrades are designed to support the current development as well as any potential future expansions, ensuring the long-term sustainability of the residential area.

The development plan emphasizes the preservation of the surrounding natural environment while transforming a portion of the existing golf course into a residential area. It ensures that the proposed development does not impact the existing prime agricultural lands in the surrounding area, and an Agricultural Impact Assessment has been

completed to ensure there are no negative impacts. Furthermore, measures will be taken to mitigate any potential environmental impact, aligning with sustainable development principles.

4.7.3 Efficient Infrastructure

A2.8 INFRASTRUCTURE

A2.8.1 Goal

It is the goal of this Plan to ensure that all infrastructure, including sanitary sewers, water distribution and stormwater management facilities and roads meet the needs of present and future residents and businesses in an efficient, environmentally-sensitive, cost effective and timely manner.

A2.8.2 Objectives

- a) *To ensure that consideration is given to the economics of providing services to the people of the Township as part of the review of any development proposal to ensure that the development pattern is efficient and does not lead to inefficiencies or a decline in the level of municipal service.*
- b) *To ensure that all necessary infrastructure required to serve the settlement areas is built as necessary prior to, or coincident with, new development.*
- c) *To establish an integrated transportation system that safely and efficiently accommodates various modes of transportation including automobiles, trucks, cycling and walking.*
- d) *To establish a comprehensive system of truck routes to adequately accommodate truck traffic generated from Aggregate Extraction operations located in the Township.*
- e) *To carefully control the street pattern within new development areas that is based on pattern of arterial, collector and local roads.*

To effectively support both current and future needs, careful thought was given to the placement of services across the site. This involved a thorough evaluation of the existing infrastructure, including the water supply, drainage, and wastewater treatment systems. After thorough evaluation, it was decided that full municipal water and wastewater

systems would be provided, as well as required stormwater management facilities. In order to ensure appropriate water pressure, a water tower has been incorporated into the design. These systems will become municipally owned. The location of the wastewater treatment plant was chosen based on the consideration factors such as: soil composition, topography, and proximity to existing facilities. The communal well locations are based on hydrogeological investigations which identified the most appropriate and abundant groundwater locations, whereas the proposed water tower location was chosen to ensure that optimal water pressure could be provided in all locations in the proposed development. This approach ensures that the site's infrastructure is not only reliable but also environmentally friendly, supporting the long-term sustainability of the development.

The street pattern has been chosen to create one major linkage from Burnside Line to Uhthoff Line via an extension of Hurlwood Lane. This new connection would require a crossing of Silver Creek, however, all mitigation measures to reduce the impact to the waterway will be implemented. To ensure that this linkage does not become a "short cut" that would encourage speeding through the community, street calming measures will be implemented, such as traffic circles, on-street parking, and other measures as appropriate. Supports for active transportation, such as sidewalks will be included, and bike lanes where appropriate. The proposed street network has been designed to minimize the number of dead-ends and cul-de-sacs, encouraging connection throughout the neighbourhood as well as efficiently using pavement.

4.7.4 Housing

A2.9 HOUSING

A2.9.1 Goal

It is the goal of this Plan to ensure that an adequate supply of land and housing choices are available for present and future residents.

A2.9.2 Objectives

- a) *To ensure that there is a ten year supply of land designated and available for residential development and a three year supply of*

residential lots at all times, provided that there is sufficient water and wastewater capacity available to service development in the Settlement Areas.

- b) *To encourage and support opportunities for mixed-use development in appropriate locations that assist in the achievement of residential intensification and affordable housing.*
- c) *To encourage the use of surplus public lands for affordable housing only if the site is appropriate for such a use and located where the use would be compatible with adjacent uses.*
- d) *To ensure that a full range of housing opportunities are available for residents in the Township.*
- e) *To encourage the development of seniors housing in the Township.*
- f) *To encourage the provision of additional rental housing, within the financial capabilities of the Township, through the use of financial incentives to the private sector and the entering into of public/private partnerships.*
- g) *To participate in County, Provincial and/or Federal housing programs that support appropriate housing development in the Township.*

To align with the housing policies set out in Section 2.9 of the Official Plan, the redevelopment plans for the subject site involve turning an existing golf course in the Township of Severn, near the City of Orillia, into a residential area. This location will offer easy access to various shops, services, and amenities for both current and future residents. The development will include a variety of housing options, such as detached, semi-detached, townhomes, and stacked townhomes (referred to as golf villas), to cater to different preferences. The proposed development ensures a minimum 10-year supply of land available for residential development within the Township. As the PPS 2024 will come into effect in October, the required lands available for development will be increased to 15 years, which will put further pressure on the Township to identify developable lands. The subject site is ideally located to respond to the additional lands needed to meet that timeframe. The development

creates sufficient water and wastewater infrastructure to accommodate growth. Moreover, the project will prioritize the development of active transportation infrastructure, including sidewalks, trail networks, and integrated bike lanes, to create a more pedestrian-friendly environment.

4.7.5 Secondary Plan (South of Division Road)

The Township's Official Plan provides policies and guidelines for the South of Division Road Secondary Plan. These policies and guidelines focus on the natural and living environment, transportation and servicing, recreation, and residential uses.

E.2 Planning Principles

E.2.2 Natural Environment

Recognizing that significant parts of the secondary plan area accommodate areas of extreme environmental sensitivity, particularly those areas situated in the vicinity of the North River and Silver Creek tributaries, and recognizing that the environmental integrity of these cold water streams and associated biotic lifeforms, is dependent upon minimizing potential interference by surface and/or groundwater pollution, no development shall be permitted within identified areas of extreme environmental sensitivity and development in adjacent areas shall be limited to that of a low density nature, so that the quality and quantity of surface water and groundwater contamination is protected or enhanced.

High density forms of development, such as that common to urban centres with communal servicing infrastructures, shall not be permitted.

The proposed development focuses on preserving and protecting sensitive land uses within this area. A thorough review of the natural heritage features on site has been undertaken by Azimuth Environmental, which has included full season studies of both flora and fauna on the site. The investigation identified a number of species which require special consideration, including: black ash, eastern wood pewee, and snapping turtles, in

addition to these, Silver Creek is a cold water stream which runs through the centre of the site. Additional investigations for maternity bat roosts and fish inventories are also proposed to be undertaken. It is appropriate to undertake additional investigations after the submission of these applications as the development plan does not propose to disturb any of the areas where further investigations will be undertaken. In addition to this, where former golf course ponds are proposed to be removed to allow for the development, any amphibious species will be relocated in accordance with appropriate relocation methods. The proposed applications have comprehensively reviewed the natural heritage system on the property and has identified that there will be no overall negative impact to these features, but the proposed naturalized plantings along Silver Creek will result in a net benefit.

E.2.3 Living Environment

Recognizing that a number of environmental factors will influence settlement patterns within the secondary plan area the secondary plan shall ensure that the living environment for area residents is optimized by preventing the occurrence of development on lands susceptible to environmental hazards, by encouraging the preservation of the area's natural amenities and by applying the standards established by the Ministry of the Environment and other concerned authorities to address any existing or potential sources of pollution or other forms of environmental degradation.

The subject lands are not within an area that is prone to flooding or other environmental hazards. Floodplains associated with Silver Creek and its tributaries have been incorporated into the design to ensure that flood buffers are in place.

E.2.4 Transportation

New vehicular and pedestrian transportation routes and facilities shall be located to ensure minimal disturbance to existing residential areas and to natural landforms. Furthermore, new transportation facilities shall be constructed in accordance with the standards established by the Township of Severn and the Ministry of Transportation.

The road network proposed will be constructed to Municipal standards, with sidewalks on at least one side of the road. Traffic calming measures will be implemented to ensure that roadways are safe for all users. Active transportation will be encouraged. A connecting road between Uthhoff Line and Burnside Line is proposed to provide multiple entrances into the site for emergency purposes and will require a bridge connection over Silver Creek. Mitigation measures will be implemented to ensure no negative impacts to Silver Creek during construction. Traffic calming measures will also be incorporated along the extension of Hurlwood Lane to ensure that traffic volumes and speeds are appropriate for a residential neighbourhood.

E.2.5 Servicing

New development shall be serviced by full municipal, on-site communal water and sewer services or private water supply and sanitary sewage disposal systems, each of which shall be in accordance with the standards established by the Ministry of the Environment and the Township of Severn. Development on partial services shall not be permitted. Furthermore, new development will only be permitted in accordance with the storm water management criteria established by the Township of Severn in consultation with the Ministry of Natural Resources.

A comprehensive servicing strategy has been prepared for the development which will include the construction of a wastewater treatment plant and a water treatment plant. Investigations have been completed which have confirmed that there is ability to service the site with an appropriate groundwater source. The proposed stormwater management plan has confirmed that appropriately sized stormwater ponds can be located on the site. The final design of the ponds will be completed in conjunction with Azimuth Environmental to ensure that thermal mitigation measures are implemented to allow outlet to Silver Creek.

E.2.6 Recreational

The recreational potential of the area shall, wherever possible, be maximized by encouraging the preservation of the area's

natural features, the development of scenic trails and the possible establishment of parks in or in the vicinity of area drainage basins. The development and expansion of active recreational areas such as baseball diamonds and soccer fields, shall be encouraged as development proceeds.

Although the applications will result in the redevelopment of Hawk Ridge Golf Course, it will not result in the loss of public recreational lands, but rather result in a net increase. The existing golf course is private, and therefore only open to paying customers. The redevelopment of a portion will allow for the creation of parklands in the subdivision, as well as recreational trails through the Natural Heritage corridor. The Hawk Ridge Golf Course will be maintained with 18 holes, rather than 27, but provide a redesigned course with added interest and difficulty. The property is within an area that is well served with golfing facilities in a 10-kilometre radius, and therefore the redevelopment of a portion of the golf course lands is not inappropriate.

E.2.7 Residential

Future residential development shall be located to optimize the natural amenities of the area and shall be separated from commercial and industrial sites and major roadways by appropriate buffers.

Highway 11 runs to the south of the site, as does a future employment area backing onto Highway 11 within the City of Orillia. A noise study has been completed which shows that there will be no negative impact from these noise sources as the distance between them is appropriate.

E.4.2.2.1 - Open Space: Golf Course

Lands situated within part of Lots 4 and 5, Concession 4, to the west of the Burnside Line and south of Hurlwood Lane, are designated "Open Space: Golf Course" and "Countryside Residential 3". The designations are intended to permit the possible development of a golf course in conjunction with a new residential plan of condominium/ subdivision. The Open Space: Golf Course designation is conceptual and the eventual configuration of the subdivision/condominium development and

golf course shall be dependent upon and subject to the studies identified in Section

E.4.3.3.3.

The proposed development complies with the Open Space policies set out in Severn's Official Plan. This policy outlines the intention of this area, which is to permit new development that functions in conjunction with the existing golf course. The proposed development plans to convert a portion of the existing golf course into a 450 to 900-unit residential development with a range of single-detached, townhouse, and stacked townhouse dwellings. The development will be integrated into the existing fabric while also focusing on the re-naturalization and enhancement of part of the natural features that currently exist on the golf course.

E.7.4 IMPACT ANALYSIS

Before an amendment is made to this secondary plan and/or before an amendment is made to the implementing zoning by-law (which may or may not require an amendment to this secondary plan), it shall be demonstrated to the satisfaction of Council:

- a) that the proposed use will not have a deleterious impact on adjacent uses;*
- b) that the proposed use does not pose a danger to adjacent uses by virtue of its hazardous nature;*
- c) that the proposed use conforms with the environmental policies of this plan and will not pollute the air, water and/or soil;*
- d) that no undue transportation difficulties will ensue from the establishment of the proposed use; and*
- e) that the proposed use conforms to the policies (including the "Servicing" and "Transportation" policies) and designations of this secondary plan and the provisions of the Planning Act.*

Section 7.4 of the Secondary Plan sets out the criteria which must be addressed when reviewing applications to the designations therein.

As reviewed previously, the lands to the north are currently under agricultural cultivation, however, are identified as Area 2 for residential purposes. The remaining 18 holes of the Hawk Ridge Golf Course are also to the north. To the east are existing residential uses on Hawk Ridge Crescent, and further east Burnside Line. To the south is the future Area 3 and Inch Farm Plans of Subdivision and Highway 11. To the west runs Uthoff Line. The proposed redevelopment of a portion of the site for residential purposes will not have a negative impact. The existing golf course will remain around the existing residences on Hawk Ridge Crescent to ensure that their views and neighboring uses remain consistent. An Agricultural Impact Assessment has been completed which shows that the proposed redevelopment will have no negative impact on existing agricultural operations. The proposed development will not have a deleterious impact on surrounding uses.

The proposed residential redevelopment of the site will not introduce any new, hazardous uses. As such, the proposal does not present a hazardous or dangerous use.

The proposed development conforms to environmental policies related to pollution of the air, water, and soil. It aims to improve the Site's existing conditions by replacing the manicured lawns and reducing the irrigation required to maintain the golf course. The development will help to improve and enhance the naturalized areas within the Site while implementing LID features to reduce stormwater runoff and spoil contamination, such as stormwater management ponds, natural buffers for water features, and a water treatment facility.

Regarding transportation, impacts from the proposed development on the existing road network and traffic flows can be adequately mitigated. The primary access to the site will be from Hurlwood Lane, connecting to Burnside Line and a new connection over Silver Creek to Uthoff Line. The proposed road network will improve the connectivity between Burnside Line and Uthoff Line, and ensure that there are two connections to the site for emergency services. The Traffic Impact Study has assessed the number of trips that will be generated as a result of the redevelopment and has identified that it will not result in any negative impacts. The new road network will be designed to support active transportation, as well as will

incorporate traffic calming measures where appropriate.

Finally, the proposed development conforms to the servicing and transportation policies as part of the Secondary Plan and the Planning Act. The Site is not serviced by municipal infrastructure; therefore, private and commercial septic systems are being used with new wastewater treatment facilities to achieve the required servicing for the Site while ensuring the services can accommodate future growth and development.

Summary

The proposed development aligns with the Township of Severn Official Plan by preserving and enhancing natural heritage features, demonstrating a commitment to environmental stewardship. It supports managed growth and settlement by concentrating development within areas that can accommodate additional growth, promoting efficient land use. The project also creates infrastructure systems to optimize servicing and encourage further growth within the area. Additionally, it contributes to a diverse housing supply, meeting the needs of current and future residents while adhering to the Township's vision for balanced and sustainable community development.

4.8 Council-Adopted Township of Severn Official Plan (2022)

In 2022, the Township of Severn adopted the new Official Plan to bring their policies into conformity with the PPS and Growth Plan, as well as the County's Official Plan. Although Township Council has adopted the plan, it is still awaiting approval by the County, which will not occur until the County's Official Plan is approved by the Province. The intent of the new Township OP is update their goals and objectives to guide Severn's growth and development to 2051. Although this Official Plan is updated, many of the core concepts and principles are similar to the previous Official Plan from 2010, including the protection of the natural environment and ensuring sustainable long-term growth.

4.8.1 Natural Heritage

1.3.1 NATURAL HERITAGE

1.3.1.1 GOAL *It is a goal of this Plan to protect and enhance the significant Natural Heritage System identified for the Township.*

1.3.1.2 OBJECTIVES

- a) *To ensure that the protection of significant environmental features and their associated ecological functions take precedent over the development of such lands.*
- b) *To ensure that a thorough understanding of the natural environment, including the values, opportunities, limits and constraints that it provides, guides land use decision-making in the Township.*
- c) *To require that land use planning contributes to the protection, maintenance and enhancement of water and related resources and aquatic ecosystems on an integrated watershed management basis.*
- d) *To avoid the loss or fragmentation of significant woodland features and the habitats and ecological functions they provide.*
- e) *To avoid changes to the water quality and hydrological and hydrogeological characteristics of watercourses, lakes, aquifers and wetlands.*
- f) *To prohibit development that will result in a negative impact to the critical functions and processes of watercourses, lakes, aquifers and wetlands.*
- g) *To prohibit the loss or fragmentation of Provincially Significant and locally significant Wetlands and Areas of Natural and Scientific Interest and the significant habitats of endangered species and threatened species and significant wildlife habitat and ecological functions they provide.*
- h) *To maintain and protect valley lands, wildlife habitat areas and the habitats of vulnerable and threatened species.*
- i) *To maintain, protect and enhance surface and groundwater resources in sufficient quality and quantity to meet existing and future needs on a sustainable basis.*
- j) *The Township shall protect, improve or restore the quality and quantity of water by:*

- i. *Promoting the efficient and sustainable use of water resources, including practices for water conservation and sustaining water quality, and*
- ii. *Maintaining linkages and related functions among surface water features, ground water features, hydrologic functions and natural heritage features and areas.*

The proposed development aligns with the goals and objectives of protecting and enhancing natural heritage resources as outlined in Section 1.3.1 of the Seven Official Plan (2022). The development emphasizes residential growth while also preserving and enhancing key natural features, such as forested areas, watercourses, and other naturalized landscapes within the golf course. Although this residential growth is significant, the ecological functions of the site and surrounding area have taken precedence and have helped to shape the design of the site.

The design strategically considers the location of these natural features, minimizing negative impacts by designing the pockets of development around them, ensuring that they are not negatively impacted. The design ensures that the Silver Creek Corridor is maintained, with only one road connection being proposed, and the rest being re-naturalized to ensure the long-term health of the feature. The design ensures that there will be no fragmentation of the features. To further protect significant natural features, buffers are implemented around watercourses and forested areas, helping to mitigate potential contaminants impact on the natural environment and to ensure thermal mitigation of the creek. Where possible, LIDs have been incorporated into the design to ensure that there is opportunity for the absorption of rainwater into the ground to ensure that groundwater levels are not decreased.

4.8.2 Growth Management

1.3.2 GROWTH MANAGEMENT

1.3.2.1 GOAL

It is a goal of this Plan to direct most forms of Development to Settlement Areas where full Municipal Sewage Services and Municipal Water

Services are planned or available. Development that is appropriately scaled and capable of being supported by rural service levels will also be directed to the Rural Settlement Areas that represent concentrated development and supports the efficient use of land in these areas.

1.3.2.2 OBJECTIVES

- a)
- b) *To permit Development that maintains and enhances Settlement Area character and scale in accordance with the policies contained within this Plan and approved Secondary Plans.*
- c) *To prohibit the development of new residential subdivisions outside of the existing Settlement Areas.*
- d) *To encourage the more efficient use of land in the Settlement Areas, where appropriate.*
- e) *To ensure that all Development is appropriately phased, coordinated with the appropriate Master Plans, and is in conjunction with the required infrastructure improvements, where appropriate.*
- f) *To ensure that the use of existing Infrastructure and Public Service Facilities should be optimized, wherever feasible, before consideration is given to developing new Infrastructure and Public Service Facilities.*
- g) *To mitigate impacts to the extent feasible from any new or expanding non- agricultural uses on surrounding agricultural*

The proposed development aims to cater to the diverse housing needs of the community while promoting sustainability in an area not currently designated for residential use. Although the Subject Site is not within a designated settlement area as outlined in the Adopted Official Plan, the Site is within the South of Division Road Secondary Plan. The primary goals and objectives of this Secondary Plan are to provide a detailed overview of land use and development while promoting sustainable growth and development. This Secondary Plan ensures a more efficient and appropriate use of the land and encourages sustainable growth in an area that provides many services and amenities within the surrounding area.

To achieve this, the plan emphasizes the optimization of infrastructure by introducing a new municipal wastewater treatment facility and water treatment facility. These measures are put in place to provide long-term support for both the existing population and any future expansions.

Additionally, the development plan includes provisions to protect and preserve the natural environment surrounding the area. Part of the existing golf course will be repurposed into residential space while ensuring that prime agricultural lands remain untouched. The plan also incorporates measures to mitigate potential environmental impacts, aligning with principles of sustainable development such as efficient use of land, buffers and setbacks from natural features, and integrated stormwater management measures.

4.8.3 Housing

1.3.4 Housing

1.3.4.1 *It is a goal of this Plan to ensure that an adequate supply of land and housing options are available for present and future residents including a full range of built forms, tenure, and supportive housing.*

1.3.4.2 Objectives

- a) *To ensure that there is a fifteen-year supply of land designated and available for residential development and a three-year supply of residential lots that are zoned, draft approved and registered at all times, provided that there is sufficient water and wastewater capacity available to service development in the Settlement Areas.*
- d) *To ensure that a full range of housing opportunities, built form and tenure are available for residents in the Township.*

5.1 IDENTIFYING LAND FOR HOMES

5.1.1 *The growth management concept of this Plan is to focus growth, including residential growth to the Township's Settlement Areas and the South of Division Road Secondary Plan. Within the Township's Settlement Areas, new residential development will occur either within the existing built-up areas through infill and intensification or through greenfield development. This Plan identifies*

sufficient lands within the Township's Settlement Areas to accommodate forecasted growth to 2051.

The redevelopment of the subject site, in accordance with Section 1.3.4 of the Adopted Official Plan, will convert an existing golf course in the Township of Severn, near the City of Orillia, into a residential community. This location will provide easy access to shops, services, and amenities for both current and future residents. The project will offer a variety of housing options, including detached homes, semi-detached homes, and townhomes (golf villas), to support diverse housing needs. This ensures the opportunity to support housing options allowing residents to age.

Additionally, the development will focus on enhancing active transportation infrastructure, including sidewalks with improved lighting for safety, expanding trail networks to connect different parts of the city, and creating integrated bike lanes that are separated from traffic to promote a pedestrian- and cyclist-friendly environment.

Although the subject site is not located within the Township of Severn, the proposed development ensures efficient infill and overall intensification in an area that can accommodate additional growth and is sufficient for the housing needs of current and future residents.

4.8.4 Community Engagement

3.2 PUBLIC CONSULTATION AND ENGAGEMENT

- b) *Promote awareness of applications, studies and initiatives by involving and informing residents and stakeholders early and as often as practical;*
- c) *Make available to the public the Township's Official Plan and Zoning By-law and other planning studies, policies and guidelines in order to foster greater awareness and knowledge of planning matters;*
- d) *Engage, consult and partner as appropriate with First Nations, Indigenous peoples and the Métis Nation on land use planning matters and when considering development applications and studies that may affect their interests, to facilitate knowledge sharing, support consideration of Indigenous interests in land use decision-making and support the identification of potential*

impacts of decisions on the exercise of Aboriginal or treaty rights;

e) Encourage the Township's private sector development partners to undertake its own community consultation process at the earliest stage of the design and planning process to engage the local community in the design of the development. To this end, the Township encourages a minimum of one (1) applicant-led consultation meeting as part of an Official Plan Amendment, Zoning By-law Amendment, and plan of subdivision/condominium applications as outlined within Section 4.2.5.

In conjunction with submission of the applications for Official Plan Amendment, Zoning By-law Amendment, and Plan of Subdivision, a robust public consultation strategy has been prepared. The consultation strategy seeks to engage neighbours and community members living in proximity to the golf course, golf course members and users, and local politicians. The purpose is to communicate the comprehensive vision of the redevelopment plan, understand how elements of the plan can be enhanced to ensure a strong sense of place and identity, and hear feedback on how redevelopment can be achieved to meet the needs of the community. The public consultation strategy contains two engagement events. The first invites residents in the area surrounding the golf course. This event will focus on the redevelopment vision and feedback gathering on the proposal. The second event invites members and golfers to discuss the golf course redevelopment with Jeff Mingay, Golf Course Architect. Mr. Mingay will present the ways in which the golfing experience will be improved and receive feedback on course elements that are important to existing players. Additional discussions with area politicians will be available upon request. Engagement with First Nations communities will be pursued through the development approvals process and will be co-initiated by Thomas Irvin Heritage, The Biglieri Group, and LIV Communities.

4.8.5 Servicing

7.3 WASTEWATER SERVICING

7.3.3 Development applications proposing the use of new private communal wastewater treatment services in accordance with the sewage servicing

hierarchy of Section 7.3.1, will be reviewed by the Township and may be considered where:

- a) Municipal wastewater services are not available, planned or feasible for the area;*
- b) Site conditions are suitable for the long-term provision of such services with no negative impacts;*
- c) A detailed hydrogeological study and an engineering design report shall demonstrate that the system will operate satisfactorily with respect to impacts of the effluent from both a quality and quantity perspective;*
- d) The Township will own and be responsible for the design, construction, start-up, operation, and maintenance of all communal sewage treatment systems;*
- e) Where the development of a communal sewage treatment system is proposed by a private developer, the costs related to the design and construction of the system shall be the responsibility of the developer and financial assurance shall be provided for capital improvements should repair or replacement of the system be necessary;*
- f) Notwithstanding the policies of this section, the Township may as part of the approval process, enter into agreements with the developer respecting the design, construction, operation, maintenance, and financial assurances of the system. Municipal ownership does not apply to sewage facilities which service single ownership commercial/industrial developments or condominium developments; and*
- g) Effluent criteria of the communal sewage treatment system shall be satisfactory to and meet the requirements of the Ministry of the Environment, Conservation and Parks.*

7.3.4 Development on municipal or private communal sewage services is only permitted if there is demonstrated sufficient reserve capacity in the system. If a review of the reserve capacity is required to be completed by the Township, the cost associated with the review shall be borne by the applicant.

7.4 Water Servicing

7.4.5 *Communal water supply systems, or extensions thereto, shall be designed in accordance with the Townships standards for communal water systems. The Township will own, and be responsible for the design, construction, start-up, operation, and maintenance of all communal water supply systems. However, where the development of a communal water system is proposed by a private developer, the costs related to the design and construction of the system shall be the responsibility of the developer. The Township may, as part of the approval process, enter into agreements with the developer respecting the design, construction, operation, and maintenance of the system.*

7.5 STORM WATER MANAGEMENT

7.5.1 *All major commercial, industrial, institutional and residential development (5 units or more) applications shall be supported by a Storm water Management (SWM) report.*

7.5.4 *Any storm water management facility should be designed to conserve the landscape and natural features as much as possible, and shall be naturalized using native species.*

The proposed development includes measures to address water and wastewater on the site, in line with the policies outlined in sections 7.3, 7.4, and 7.5 of the Adopted Official Plan. Since there are no existing municipal services available in the planned development area, the site will have a wastewater treatment facility and a water treatment facility which will become municipally owned to meet the development's needs and accommodate potential future expansion.

For stormwater management (SWM), the development will feature two stormwater management ponds to lessen the impact of excess stormwater and runoff from additional impervious surfaces. These facilities will help preserve existing natural features, with increased vegetation as part of the development. The Stormwater Management Report (SWM) which has been provided as a part of this submission, authored by Crozier Consulting Engineers and dated September 2024, outlines how SWM will be captured through the site through the creation of seven (7) catchment areas. An analysis of the pre-development conditions were undertaken

to confirm that there will be no change in the pre- and post-development conditions. A key component of the stormwater management plan will be ensuring that water is appropriately treated in terms of quality, but also to address thermal mitigation measures so as to not impact Silver Creek, which is a cold-water creek. The required stormwater management ponds will be naturalized and have been worked into the design of the subdivision to be adjacent to natural heritage features and be harmonious with these features. The intent is to naturalize the areas around the ponds as much as feasible to provide additional passive recreational spaces which providing the stormwater management function.

4.8.6 Active Transportation

9.7 ACTIVE TRANSPORTATION

9.7.1 *Active transportation is encouraged in the Township. Development applications will be evaluated for opportunities to incorporate active transportation, including but not limited to land dedication, connectivity to other routes and linking of neighbourhoods and Settlement Areas.*

9.7.3 *The Township will require, where appropriate, Active Transportation infrastructure and facilities, such as trails, sidewalks and bike racks, which are safe, accessible, connected to the street system and link to various uses in the community, through the Site Plan Control process.*

9.7.4 *The creation of accessible programs and facilities inclusive of all ages and abilities that encourage walking and cycling throughout the Township will be encouraged.*

The proposed development incorporates a range of design methods to help promote active transportation within the site. The proposed development includes the installation of integrated bike lanes and widened sidewalks. A network of trails through the natural heritage corridor are proposed to provide passive recreational opportunities within this area. Without the proposed redevelopment of a portion of the golf course, the Silver Creek corridor would continue to be in private ownership and would not allow for public access. Through the redevelopment of the

property, the majority of the corridor in this area will be transferred to public ownership and will provide opportunity to create trails through the buffers which will encourage people to walk, cycle, and run in this new public space. Linkages to the Area 3 Plan of Subdivision are proposed to encourage active transportation to connect between these neighbourhoods to prevent isolation. These features are designed to ensure accessible and safe mobility options for all residents and visitors to the area.

Summary

The proposed development aligns with the Township's Adopted Official Plan. It protects natural areas and includes important environmental features in the project design. The development aims to manage growth and encourage sustainable land use. The development creates different housing options to meet the community's needs. It also involves the community, considering local input and making residents feel involved. The development plans for proper infrastructure and promotes walking and biking through connected paths and trails, which will help create a healthy and lively community.

4.9 Council-Adopted South of Division Road Secondary Plan (2022)

4.9.1 Planning Principles

11.15.1.5 New development shall be serviced by full municipal, on-site communal water and sewer services or private water supply and sanitary sewage disposal systems, each of which shall be in accordance with the standards established by the Province and the Township of Severn. Development on partial services shall not be permitted. Furthermore, new development will only be permitted in accordance with the storm water management criteria established by the Township of Severn and in accordance with the Provincial guidelines.

A new water treatment facility and wastewater treatment facility will be constructed to accommodate this proposed development. Coordination with the County of Simcoe, Township of Severn, and environmental agencies have informed the servicing approach chosen, which will include new water wells and a new water tower to ensure adequate supply and pressure to service the proposed development. A Master Servicing Plan has been prepared by Crozier which examined the servicing needs of the subject site, but also the Areas 2 and 3 lands, as well as their potential servicing needs. This study identified that the proposed servicing strategy is appropriate.

11.15.1.6 The recreational potential of the area shall, wherever possible, be maximized by encouraging the preservation of the area's natural features, the development of scenic trails and the possible establishment of parks in or in the vicinity of area drainage basins. The development and expansion of active recreational areas such as baseball diamonds and soccer fields, shall be encouraged as development proceeds.

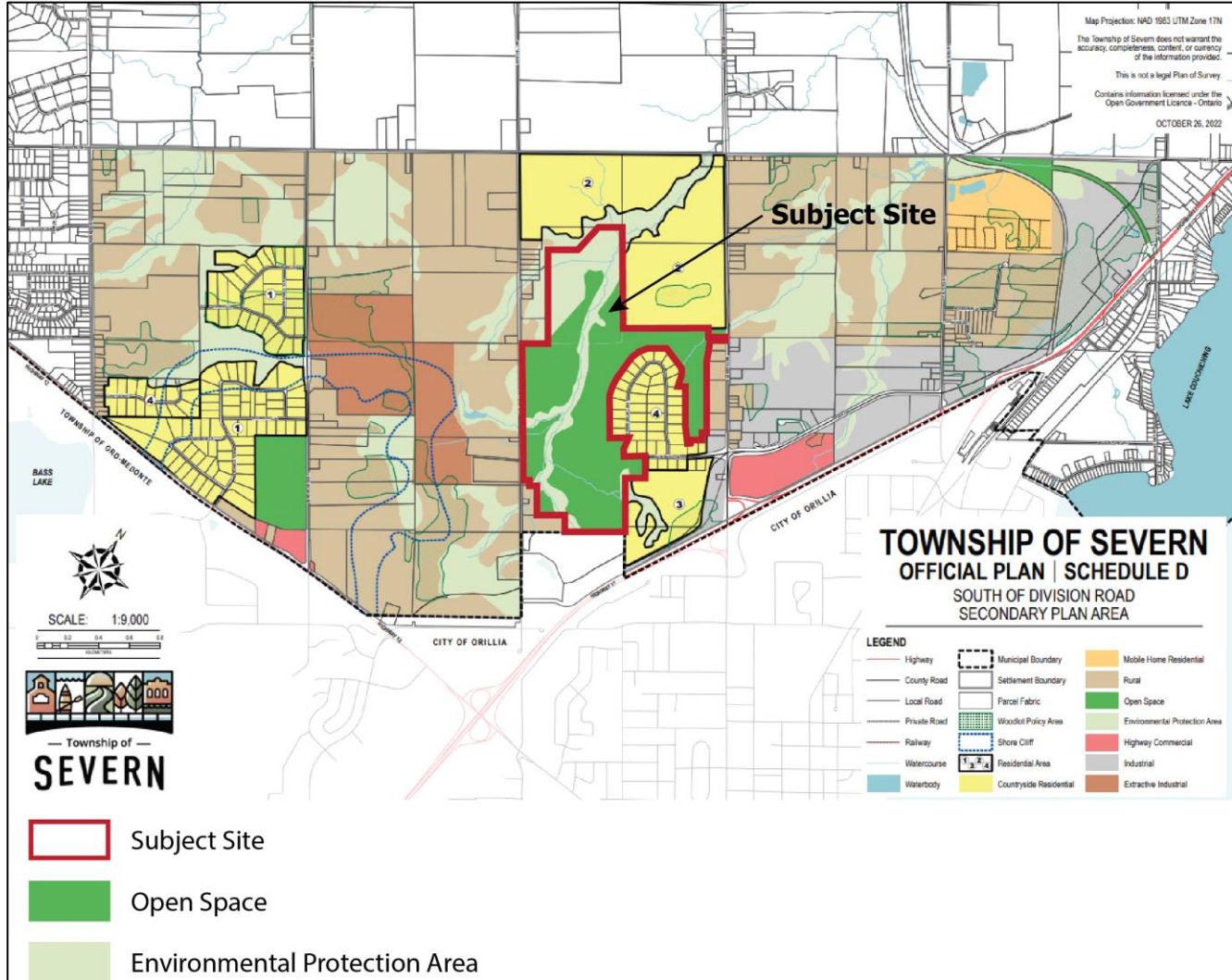
As has previously been identified, this redevelopment plan will include the creation of public parklands but will also include the introduction of passive recreational trails through the Silver Creek corridor. This will provide opportunities for passive recreation, as well as more formalized recreational opportunities within the neighbourhood. The redesigned Hawk Ridge Golf Course will also continue to operate and serve the community.

11.15.1.7 Future residential development shall be located to optimize the natural amenities of the area and shall be separated from commercial and industrial sites and major roadways by appropriate buffers.

The lands further south along Highway 11 are currently designated for employment uses. At this time, they have not been developed as they require municipal infrastructure, including roads, water, and sewer. There is a significant setback between these uses, and the proposed residential development will not be impacted by these employment lands.

11.15.1.11 Recognizing that the Secondary Plan area's favourable natural features and strategic

Figure 13 – South of Division Road Secondary Plan



location at the junction of two major trade routes, may have fostered relatively intensive First Nation presence and settlement in the area, therefore the archaeological potential of the Secondary Plan area shall be investigated prior to major disturbances being permitted.

In recognition of past First Nation settlement in the area, an Archeological Investigation was undertaken by Thomas Irvin Heritage to determine archeological significance of the subject site. Ongoing engagement with First Nations is planned through the development approvals process.

4.9.2 Design Guidelines

11.15.3.1 The Secondary Plan area displays a predominantly natural landscape. It is an objective of this section to retain as much of this natural character as possible while permitting development within the policy framework of the plan. Some of the basic elements contributing to the character of the Secondary Plan area include its undulating topography, forest cover and prominent upland and lowland environmental areas. In order to protect and enhance this landscape a number of design guidelines are provided below and these guidelines shall be utilized in assessing any new development proposal or public work:

- a) *Existing vegetation, including forested areas, topography, views and watercourses shall be preserved as much as possible. Clear cutting of treed sites shall be discouraged and where appropriate, tree inventories deemed shall be undertaken and preservation techniques devised, to ensure the survival of designated trees.*
- b) *New roads, buildings, and utility installations shall, as far as possible, be designed to blend with the natural landscape.*
- c) *Existing landforms and grades shall be maintained as much as possible.*
- f) *Generally, new development shall be screened from major roads, both within and surrounding the Secondary Plan area, by existing tree cover, planting areas or other appropriate vegetation or berming.*
- i) *Where additional landscaping is necessary as a component of site development, it should generally consist of plants which are indigenous to the area.*
- k) *The use of building materials and building designs that blend with the landscape and with each other shall be encouraged. The natural character of the landscape shall be respected and reinforced, particularly in forested areas.*

The proposed development takes into consideration the significant natural environment found in the predominantly naturalized area of Severn. The design aligns with the guidelines outlined in the South of Division Road Secondary Plan, integrating various principles focused on enhancing the site's overall appearance, aesthetics, and environmental function. The primary objective is to integrate the development seamlessly with the surrounding environment.

The proposed development seeks to maintain the existing natural features while improving the natural landscape to preserve and enhance the site's natural character. The site, which currently functions as a golf course, will be transformed by introducing re-naturalizing the Silver Creek corridor, stormwater management ponds, parks and greenspace, and careful buffering from significant natural features. These strategies will serve to not only maintain but also enhance the ecological balance of the area.

A key aspect of the development's design and layout is protecting natural features. Thoughtful road design and building layout will be employed to minimize the development's impact on the surrounding landscape. By incorporating efficient land use techniques and implementing environmentally conscious building practices, the development aims to seamlessly coexist with the existing natural environment.

4.9.3 Environmental Protection

b) The uses permitted shall include forestry and conservation uses, wildlife areas, public uses described in above not requiring the construction of buildings, public parks, walking, jogging, bicycling and cross-country skiing trails, and other similar open space and recreational uses.

c) The establishment of any permitted use shall occur in a manner which ensures no negative impacts on the natural features or ecological functions of the Environmental Protection designation. An Environmental Impact Study is required for permitted uses within the Environmental Protection designation and all development or site alteration within 50 metres of the Environmental Protection designation. Further, an ENVIRONMENTAL IMPACT STUDY is required within 120 metres of provincially significant wetlands, the habitat of threatened or endangered species or hazardous lands.

e) It is essential that Environmental Protection areas be protected from future development to preserve the Secondary Plan areas natural resources and ecological functions. There is therefore no public obligation to redesignate any Environmental Protection land and nothing in this Secondary Plan shall be construed to imply that Environmental Protection areas are free and open to the general public or that such areas will be purchased by the township or any other public agency. Where new development is proposed on a site which includes lands designated Environmental Protection because of physical or environmental hazards, such lands shall not

necessarily be acceptable as part of the parkland dedication pursuant to the provisions of the Planning Act. All Environmental Protection lands that are dedicated to the municipality under subdivision/condominium procedures or site plan control agreements shall be conveyed in a satisfactory physical condition and if an open watercourse is involved the dedication shall provide sufficient land for property maintenance operations to be carried out.

f) It is the intent of this Secondary Plan that the boundaries of the Environmental Protection areas shown on Schedule D be used as a guide in preparing the implementing Zoning By-law and that appropriate setbacks from the high water mark of any creek, stream or wetland be established in the implementing Zoning By-law subject to the conclusions and recommendations of an ENVIRONMENTAL IMPACT STUDY. When more detailed mapping becomes available, Council may amend the Secondary Plan and implementing Zoning By-law to reflect the improved mapping and the more detailed mapping shall take precedence in the consideration of development applications. The boundaries of the Environmental Protection designation are approximate and it is the intent of this Secondary Plan that their precise location be determined at the time of the Township's consideration of development applications. An Amendment to this Secondary Plan shall not be required to make modifications to the boundaries of the Environmental Protection designation providing the overall intent of the Plan is maintained.

An EIS has been completed in support of this application. This study identified the natural heritage systems on the site, and identified appropriate buffers to ensure that these features are protected for the long term. The redevelopment will allow for increased plantings of native species through the Silver Creek Corridor to create a more naturalized setting, rather than the current condition which is manicured lawn in association with the existing golf course. These lands will be placed into a more restrictive designation and zone to ensure

that no development is permitted in these areas in the future. It is the intention that the natural heritage block will be dedicated to the Township as part of the registration of the subdivision to ensure that these lands are publicly owned and protected. It will also allow for passive recreational trails to be constructed through the block and be enjoyed by all current and future residents.

4.9.4 Open Space

c) Lands situated within part of Lots 4 and 5, Concession 4, to the west of the Burnside Line and south of Hurlwood Lane, are designated Open Space and Countryside Residential 3. The designations are intended to permit the possible development of a golf course in conjunction with a new residential plan of condominium/subdivision. The Open Space: designation is conceptual, and the eventual configuration of the subdivision/condominium development and golf course shall be dependent upon and subject to the studies identified in this Plan.

e) Recreational areas, including pedestrian trails located on lands designated for Open Space and Environmental Protection uses, may be interconnected to provide for both continuous pedestrian passage across the Secondary Plan area and a common means of access to parks located in the vicinity of low-lying basin lands. Access to all public open space areas shall be maximized by regulating landfill and the erection of buildings and through the design of bridges, culverts and stream improvement projects. Where the linkage of recreational facilities results in conflicts between the Environmental Protection and Open Space policies of this Secondary Plan, the Environmental Protection policies shall take precedence.

The proposed development thoughtfully incorporates additional open space and outdoor amenity areas within the residential sections of the site. Approximately 2.0 hectares of land will be dedicated to parkland, exceeding required parkland dedication as per policy 8.2.3 (a) in the Council-adopted Official Plan. Parkland will feature an integrated trail network that provides residents

with accessible routes for active transportation. These trails and open spaces are designed to offer large areas for passive recreation, enhancing the community's quality of life.

To align with the Open Space policies, the development prioritizes the protection of natural features while seamlessly integrating residential areas. The recreational trails, in combination with the accessible open spaces, create an environment that supports both ecological preservation and community well-being. This approach to environmental management ensures that we protect and improve natural landscapes, allowing residents to enjoy direct access to the outdoors while respecting and enhancing the site's natural character.

4.10 Township of Severn Zoning By-law 2010- 65

The subject site is zoned Recreational Commercial Type Nine (C9-1/HR) in the Township of Severn Zoning By-law 2010-65. The C9 zone permits 'open air' recreational commercial uses, including golf courses. The C9 zone will remain in place for the portion of land to accommodate the redesigned golf course and are not subject to these applications. Lands proposed to accommodate residential development will require a zoning by-law amendment to rezone lands to the following residential zones:

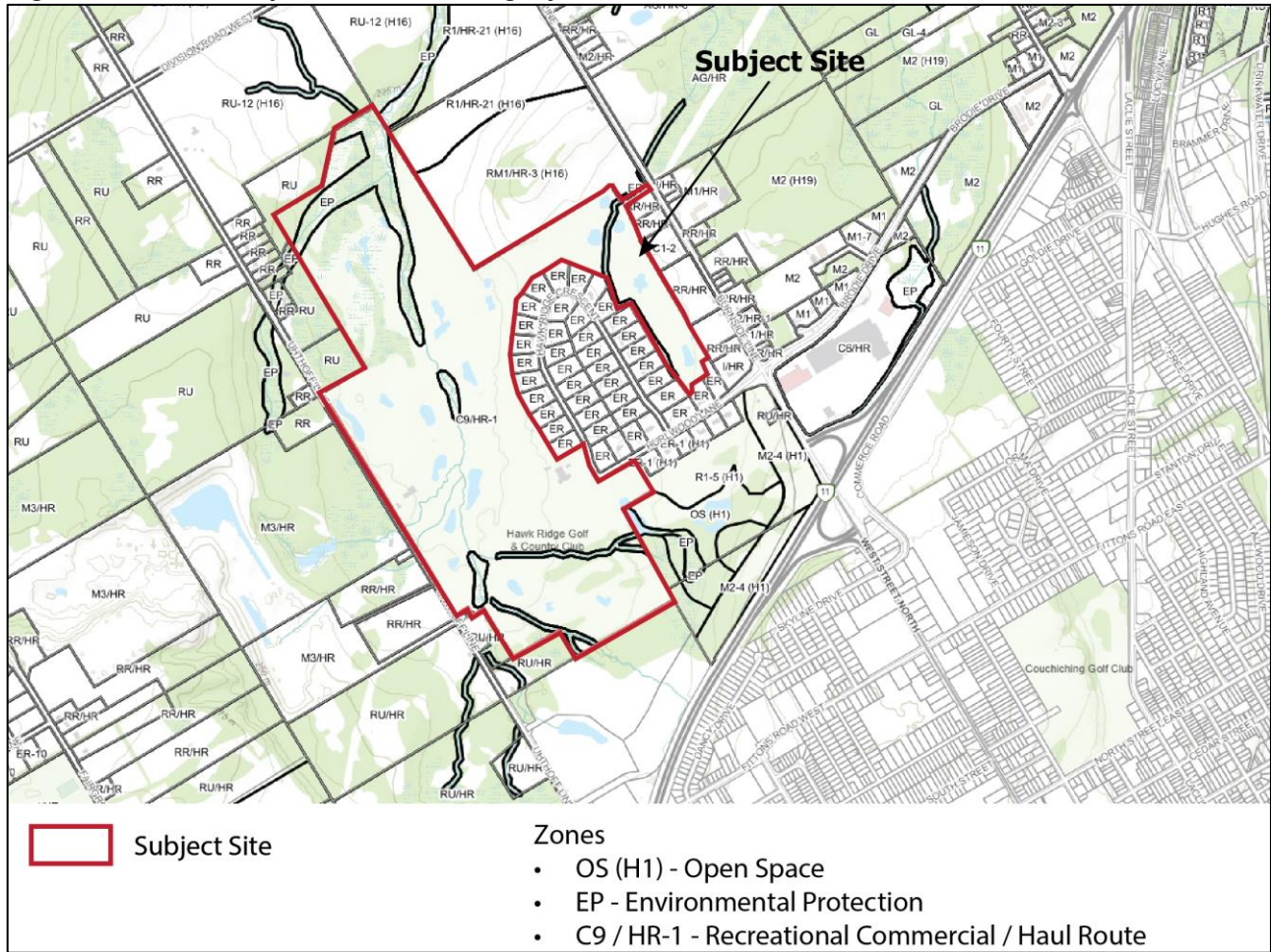
- Residential Type One (R1-XXX) to permit single-detached dwellings with site specific provisions;
- Multiple Residential Type One (RM1-XXX) to permit townhouse dwellings with site specific provisions;
- Multiple Residential Type Two (RM2-XXX) to permit stacked townhouse dwellings with site specific provisions.

The floodplain associated with Silver Creek, and any other natural features identified on site, will also be rezoned Open Space.

The draft RM2 zoning proposed for the condominium blocks has been structured so that the front, sides, and rear lot lines will all be measured to the block boundary, and no internal lot or unit lines will be used for setbacks. There are

also no lot coverage limits on a whole block or lot/unit basis. The purpose of implementing the zoning by-law amendment in this manner is to provide the flexibility in the future for stacked townhouses or block townhouses to be constructed. Further, it will ensure that appropriate setbacks are maintained to the external lot lines but allows flexibility of design within the block itself. The elimination of the lot coverage limits will allow the maximum covered area to be established through setbacks, which will ensure that an appropriate amount of soft-scaped area is provided to allow for infiltration of stormwater and prevent flooding. All of the details regarding design and setbacks will be further evaluated through the Site Plan process.

Figure 14 – Township of Severn Zoning By-law 2010-65



5.0 Supporting Studies

5.1 Hydrogeological Assessment Report

A Hydrogeological Assessment was prepared by Crozier Consulting Engineers and is dated September 2024. The scope of the assessment intends to fulfil requirements of regulatory planning applications and establish a baseline for engineering design of the subject site. It was completed using the terms of reference for a municipally serviced subdivision as defined by the Lake Simcoe Region Conservation Authority (LSRCA) and the Severn Sound Environmental Association (SSEA). The report characterizes the geological and hydrogeological regime of the site and describes its seasonal high groundwater elevation at the subject site.

Through the findings of the field investigation, a discussion of potential impacts to groundwater resources are also explored. Although at this stage, the stormwater management strategy has yet to be finalized, further commentary on best management practices and potential mitigation measures are provided to help guide future design considerations. Impacts to groundwater resources as a result of the Hawk Ridge development should be considered negligible. A feature-based water balance and complete analysis of the surface to groundwater interactions will be completed under an amended hydrogeological assessment report at a later date. The report and its findings are advised to be preliminary and should not be used for final design purposes. For more details, please see the enclosed Hydrogeological Assessment Report.

5.2 Floodplain Report

A Floodplain Report was prepared by Crozier Consulting Engineers and is dated September 2024.

This Report was prepared to establish a Regulatory Floodline on the Subject Lands in support of establishing development constraints. The report proposed floodplain regularization and supports the Concept Plan suggestions within. For more details, please see the enclosed Floodplain Report.

5.3 Development Constraints Report

A Development Constraints Report was prepared by Crozier Consulting Engineers and is dated September 2024. The report was prepared to summarize the results of the natural hazard and natural heritage assessments on the subject site to establish a consolidated development limit that respects all development constraints. It presents several conclusions related to development constraints, which can be read in detail in the enclosed report.

5.4 Preliminary Stormwater Management Report

A Stormwater Management (SWM) Report was prepared by Crozier Consulting Engineers and is dated September 30, 2024. The report was prepared to outline the proposed stormwater management strategy for the site. The report concludes that the proposed development can be adequately serviced from a stormwater management perspective, which will include two SWM facilities and onsite controls for the Golf Villa Block, with Silver Creek as an outlet, and other design considerations. For more information, please refer to the enclosed report.

5.5 Functional Servicing Report

A Functional Servicing Report was prepared by Crozier Consulting Engineers and is dated September 2024. The report was prepared to outline the proposed servicing and grading strategy for the site. The report concludes that the proposed development can be adequately serviced. It will have three access connections from Uthoff line and an extension of Hurlwood Lane and roads will

be built to municipal standards. The site will be serviced with an internal gravity sanitary sewer system that will discharge to the proposed on-site wastewater treatment plant. On-site wells will provide water supply for the development that will be treated in an on-site water treatment plant. Internal watermain will follow the alignment of the internal road network complete with all valving, appurtenances, and hydrants to meet Township of Severn standards. The ultimate water and wastewater servicing solution for the site will be determined through the Class E Environmental Assessment (EA) process. The Township of Severn has deferred the Class EA process at this time. An assimilative capacity study is forthcoming. For more information, please refer to the enclosed report.

5.6 Master Servicing Report

A Master Servicing Report (MSR) was prepared by Crozier Consulting Engineers and is dated September 2024. This report was requested by the Township of Severn and County of Simcoe during a meeting held on August 13, 2024. The report demonstrates that the proposed development does not impede future growth of other lands within the South of Division Road Secondary Plan Area. The MSR was prepared to recommend water and wastewater servicing solutions for the remaining undeveloped lands within the Secondary Plan area. For more information, please refer to the enclosed report.

5.7 Transportation Impact Study

A Transportation Impact Study (TIS) was prepared by Crozier Consulting Engineers and is dated September 2024. The TIS was prepared to assess the impacts of the subject site on the boundary road network and to recommend warranted mitigation measures. The report presents several measures related to traffic management and mitigation. The TIS supports the proposed development. For more information, please refer to the enclosed report.

5.8 Environmental Impact Study

An Environmental Impact Study was prepared by Azimuth Group and is dated September 2024. The purpose of this study is to identify candidate Key Natural Heritage Features (KNHFs) present in the study area and address potential impacts to those KNHFs. A review of background information, associated with a detailed field program, was undertaken in spring/summer 2023 to identify significant KNHFs. The report also examines potential for Species at Risk protected under Ontario's *Endangered Species Act*, 2007 to occur in the study area. The potential for negative impacts to KNHFs resulting from the proposed development is considered, and recommendations for avoidance and mitigation are provided. For more information, please refer to the enclosed report.

5.9 Environmental Site Assessment

A Phase 1 Environmental Site Assessment (ESA) was prepared by Crozier Consulting Engineers and is dated October 2, 2024. The purpose of the ESA was to develop a preliminary determination of the likelihood that one or more contaminants have affected any land or water on, in or under the site; determine the need for a Phase 2 ESA; and provide a basis for carrying out any Phase 2 ESAs required prior to filling a Record of Site Condition. A total of 7 Potential Contaminating Activities (PCAs) were identified onsite relating to one or more aspects of the golf course land use. A total of four offsite PCAs with the potential to impact the site were identified in association with a Municipal Works Yard located hydraulically upgradient of the site. A total of 12 areas of potential environmental concern were identified as a result of the PCAs on offsite. A Phase 2 ESA is required to assess soil, sediment, and groundwater quality prior to filling a Record of Site Condition. For more information, please refer to the enclosed report.

5.10 Archaeological Study

A Phase 1 Archaeological Study was prepared by Irvin Heritage and is dated October 7, 2024. The report indicates that no previous archaeological

assessments have occurred within the subject site and there are currently no registered archaeological sites within or directly adjacent to the site itself. The Stage 1 Archaeological Assessment indicated that the site retains archaeological potential. Given the results and conclusions of the completed Stage 1 assessment, a Stage 2 Archaeological Assessment is required. For more information, please refer to the enclosed report.

5.11 Noise Impact Study

A Noise Impact Study was prepared by Thornton Tomasetti and is dated October 2024. The purpose of this study is to review the potential land use compatibility impacts between the Project and the surrounding commercial and industrial. It provides recommendations to meet the requirements of Ontario Ministry of the Environment, Conservation and Parks (MECP) policies, as well as additional local requirements, where relevant. The report concludes that transportation noise impacts are expected to meet all applicable MECP limits and that surrounding stationary noise is not anticipated to be a concern for the proposal. For more information, please refer to the enclosed Noise Impact Study.

5.12 Land Use Compatibility Study

A Land Use Compatibility Study was prepared by Thornton Tomasetti and is dated October 2024. The purpose of this study is to review the potential land use compatibility impacts between the proposed redevelopment and the surrounding commercial and industrial land uses. The report provides recommendations to meet the requirements of the Ontario Ministry of the Environment, Conservation and Parks policies, as well as additional local requirements, where relevant. The report concludes that the proposal is compatible with surrounding land uses. For more information, please refer to the enclosed Land Use Compatibility Study.

5.13 Agricultural Impact Study

An Agricultural Impact Study was prepared by Orion Environmental Solutions. They undertook an

Agricultural Impact Assessment of the subject property and the surrounding area. As part of their review, it was identified that a full study was not required as there are no agricultural lands which will be impacted by the proposed development. A review of the area for existing livestock operations, as well as barns capable of housing livestock was undertaken to calculate the Minimum Distance Separation (MDS) calculation to ensure no nuisance odour impacts are felt by the proposed development.

5.14 Urban Design Brief

An Urban Design Brief was prepared by Urbantypology Inc. and is dated October 2024. The purpose of the brief is to outline a vision for the design of the Hawk Ridge community, including the residential, golf course and environmental areas, streetscape, parks, gateways, active transportation routes, and built form. For more information, please refer to the enclosed Urban Design Brief.

6.0 Conclusion

The Biglieri Group Ltd. has been retained by LIV (Hawk Ridge) LP; LIV (Hawk Ridge) GP Inc. to prepare planning applications and obtain the municipal approvals required to facilitate redevelopment of a portion of the existing Hawk Ridge Golf Club for residential purposes. This proposal seeks an Official Plan Amendment, Zoning By-law Amendment and Plan of Subdivision. The existing designation and zoning of Open Space does not permit residential uses. The proposed development consists of a redesigned 18-hole golf course, residential units in the form of single-detached, townhouse and stacked townhouse typologies, stormwater management facilities, public roads and parks, a trail system and re-naturalized environmental areas.

This Planning Rationale Report has evaluated the merits of the proposed applications in the context of all applicable Provincial, County, and Township policies, and relevant non-statutory policies. It is our opinion that that the proposed development is consistent with the policies as set out in the Provincial Policy Statement (2020), the Provincial Planning Statement (2024), conforms to the policies of the Growth Plan for the Greater Golden Horseshoe (2020), and conforms with the Official Plans for both the County of Simcoe and the Township of Severn, as well as the South of Division Road Secondary Plan.

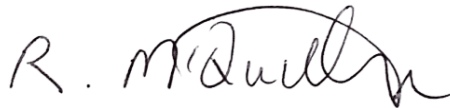
For all the foregoing reasons, as well as other reasons as outlined in this report, it is our professional opinion that the proposed development is appropriate and desirable, represents good planning, and warrants the support of the Township of Severn.

If you should have any questions or concerns, please contact the undersigned at your earliest convenience.

Respectfully submitted,
THE BIGLIERI GROUP LTD.



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