



TOWNSHIP OF EAST GARAFRAXA

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Chair Horner and Members
Community Development and Tourism Committee
County of Dufferin
W. & M. Edelbrock Centre
30 Centre Street
Orangeville, Ontario L9W 2X1

January 26, 2022

Attn: County of Dufferin Clerk and Mr. C. Joudry, Director of Development and Tourism
Sent only by email: clerk@dufferincounty.ca and cjoudry@dufferincounty.ca

Dear Madam/Sir:

**Re: Item #5 Community Development & Tourism Committee Agenda January 27, 2022
Municipal Comprehensive Review – Draft Land Needs Analysis Report**

This submission is being made on behalf of the Township of East Garafraxa as directed by Township Council.

The Township received the above noted report (Land Needs Analysis) late on Friday, January 21, 2022, together with the report to the Committee from the Director of Development and Tourism entitled "Municipal Comprehensive Review (MCR) Timelines. The Township Council, staff and consultants have only had the brief time since the release of the report to carry out a preliminary review of the material.

That limited review has identified what appear to be serious flaws in the assumptions and methodology on which the conclusions of the Land Needs Analysis are based. The Township has focused on the matters which affect East Garafraxa. However, given the significance of the concerns, it can be anticipated that similar issues may be applicable to other municipalities in the County as well.

The concerns related to East Garafraxa include the assumption that the rural settlement areas are serviced solely by private services when the community of Marsville, where the majority of future growth will be located is, and is being planned to continue to be, serviced by a municipal water system. The direct result of this incorrect assumption is the use of a low residential density assumption of 2.5 dwelling units per net hectare as a basis for the calculation of land need. This results in turn, in the conclusion that an additional 20 hectares of residential growth area is required for the Township.

To further complicate matters, there are other assumptions which are not clear, including how the report arrived at a shortfall of 49 units in the Township by 2051. Furthermore, it is not evident, at least from the initial review, how the analysis accounted for secondary units which are now permitted in accordance with the Planning Act or how the analysis handled any take up for rural severances. Further, the analysis related to employment land is also not transparent.

Based on this preliminary review, the Township has fundamental concerns with the Land Needs Analysis and its conclusions: Concerns which Township Council feel must be addressed before the study proceeds any further.

The timelines set out in the report from the Director of Development and Tourism to the Committee – a timeline which is being established apparently to support engagement and transparency - will instead in the opposite result. The expedited process does not allow for a through and comprehensive review by the local municipalities. It starts with the current report and asks the County Council to “accept” the report as a basis for the consultation process. The current report does not appear to be appropriate as the starting point for consultation. It appears to be inaccurate and flawed.

The Township therefore would request that the Committee not accept the report, but instead:

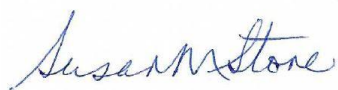
That the Director of Development and Tourism be directed to circulate the draft report to the local municipalities for review and comment including where requested a meeting or meetings with the consultant;

That the Director and consultant consider the comments received from the local municipalities and revise the report prior to resubmitting it to the Committee, together with an updated public and agency consultation schedule; and,

That the Director and consultant advise the Ministry of Municipal Affairs and Housing that because of the need for further review and analysis that the County will not be submitting the Conformity Amendment until later in 2022.

Thank you for your consideration of this submission.

Yours truly,

A handwritten signature in blue ink that reads "Susan M. Stone". The signature is cursive and fluid.

Susan M. Stone, AMCT, CAO/Clerk
Corporation of the
Township of East Garafraxa

c.c. Committee Members