

Hello ,

WSP has been retained and is acting on behalf of Canadian National Railway Company (CN). We are pleased to have this opportunity to provide comments on the Township of Ramara's Official Plan.

CN is a federally regulated railway company, and is governed by various federal legislation, including the *Canada Transportation Act* (CTA) and the *Railway Safety Act* (RSA), among others. The CTA requires federally regulated railway companies to only make such noise and vibration as is reasonable. The test of reasonableness under the CTA takes into consideration the railway company's operational requirements and its level of service obligations under the Act, as well as the area where the construction or operation takes place. The Canadian Transportation Agency (Agency) is the federal body that assesses the reasonableness of noise associated with the construction or operation of a federal railway company. In its decisions, the Agency has concluded that municipalities have a responsibility to assess compatibility issues before approving housing developments in proximity to railway rights-of-way. The CTA also commented that where a municipality approves the development, it has a responsibility to ensure that the necessary mitigation measures are implemented. One example of such a decision is Decision No. 69-R-2014, dated February 27, 2014.

It is important to understand that there is no specific decibel limit contained in federal guidelines related to the construction or operation of rail facilities. Those federal guidelines clearly state that, while the Agency may take provincial and municipal noise and vibration guidelines into account in its deliberations, the Agency is not bound by those guidelines.

Rail Proximity Guidelines are available at the following: https://www.proximityissues.ca/

Guidelines for the Resolution of Complaints Over Railway Noise are available at the following: <u>https://otc-cta.gc.ca/eng/publication/guidelines-resolution-complaints-over-railway-noise-and-vibration/</u>

We recommend that the following policies be added and/or integrated into the Elgin County new OP. In some cases, they provide clarification, such as definitions and map information, which should be considered for planning purposes, particularly with respect to mitigation.

1. General Acknowledgement

Sensitive land uses shall not be encouraged adjacent to or in proximity to rail facilities. Development in proximity to rail facilities shall be developed in accordance with the Guidelines for New Development in Proximity to Railway Operations prepared by the Federation of Canadian Municipalities and the Railway Association of Canada (FCM/RAC Guidelines).

2. Include a definition for Rail Facilities and Sensitive Land Uses.

We request that the following definitions be included in the OP to improve understanding of railways and development coexistence issues in a planning perspective:

Rail Facilities: means rail corridors, rail sidings, train stations, inter-modal facilities, rail yards and associated uses, including designated lands for future rail facilities.

Sensitive Land Uses: means buildings, amenity areas, or outdoor spaces where routine or normal activities occurring at reasonably expected times would experience one or more adverse effects from operational emissions generated by a nearby rail facility. Sensitive land uses may be a part of the natural or built environment. Examples may include but are not limited to residences, daycare centers, educational and health facilities, playgrounds, sporting venues, public parks and trails, recreational areas, places of worship, community center, hotels, retirement residences, and long-term care homes, group residences, crisis center, and any uses that are sensitive to dust, odour, noise, and vibration emissions.

3. Identify Rail Facilities and Areas of Influence

We recommend identifying rail facilities and the areas of influence for sensitive land uses (300 meters for a Principal main line), on relevant maps in the Official Plan. This approach will reduce the uncertainty for planning and developing sensitive land uses near Railway corridors and will help reduce future land use incompatibility issues and conflicts with rail operations.

4. Specific regulations for developments in proximity to rail facilities.

- a) measures options, security issues, validation processes and roles of stakeholders:All developments in proximity to rail facilities shall be developed in accordance with the FCM/RAC Guidelines;
- b) All proposed buildings to be occupied by an industrial use shall be setback 15 meters from a Principal main line;
- c) All proposed residential developments or other sensitive uses located within 300 metres of a railway right-of-way be required to undertake noise studies, to the satisfaction of the Municipality, in consultation with the appropriate railway operator, and shall undertake to implement the appropriate measures to mitigate any adverse effects from noise that were identified in the report and as may be required by the appropriate railway operator;
- d) All proposed residential developments or other sensitive uses located within 75 metres of a railway right-of-way be required to undertake vibration studies, to the satisfaction of the Municipality, in consultation with the appropriate railway operator, and shall undertake to implement the

appropriate measures to mitigate any adverse effects from vibration that were identified in the report, and as may be required by the appropriate railway operator;

- e) All proposed building setbacks shall be in accordance with the FCM/RAC Guidelines. As a general guideline, buildings shall be setback 30 metres with an appropriate berm abutting the rail right-of-way. Reduced setbacks can be considered in certain circumstances dependant on the proposed use and in conjunction with additional studies and alternative safety measures, to the satisfaction of the Municipality, in consultation with the appropriate railway operator;
- f) All proposed residential developments or other sensitive uses located adjacent to railways shall implement appropriate mitigation measures, including but not limited to, safety setbacks, berms, crash barriers and security fencing, in accordance with the FCM/RAC Guidelines;
- g) All proposed residential developments or other sensitive uses located adjacent to railways shall implement the applicable warning clauses provided by the appropriate railway operator;
- h) All proposed residential developments or other sensitive uses located adjacent to railways shall implement, secure and maintain any required rail noise, vibration, and safety impact mitigation measures, along with any required notices on title, such as development agreements, warning clauses and/or environmental easements, through appropriate legal mechanisms, to the satisfaction of the Municipality and the appropriate railway operator; and,
- i) All proposed residential developments or other sensitive uses located in proximity to rail facilities shall evaluate, prioritize and secure grade separation of railways and major roads, in co-operation with Transport Canada and the appropriate railway operator;
- j) All proposed vehicular property access points shall be located at a minimum 30 meters setback from an at-grade railway crossings;
- k) A chain link fence of a minimum of 1.83 meters in height shall be installed and maintained along the mutual property line shared with the railway right of way for all proposed developments.

5. Stormwater management facilities

Railway corridors/properties with their relative flat profile are not typically designed to handle additional flows from neighboring properties, therefore future developments should not discharge or direct stormwater, roof water, or floodwater onto a railway right of way. Any proposed alterations to the existing drainage pattern affecting railway property must receive prior concurrence from the appropriate railway operator.

Stormwater or floodwater flows should be designed to maintain the structural integrity of the railway corridor infrastructure; avoid sediment deposits; and prevent adverse effects on the railway right of way. Drainage systems should be designed to capture storm waters on-site or divert the flow away from the rail corridor to an appropriate drainage facility.

Stormwater management facilities must be designed to control stormwater runoff to pre-development conditions including the duration and volume of the flow and accordingly have no impacts on the railway right of way, including ditches, culverts, and tracks.

6. Recreational uses

To mitigate any potential trespassing onto the railway right of way, we recommend the installation of a minimum 1.83-meter-high chain link safety fence along public parks and trails and site-specific landscaping design to improve the visual quality of the areas adjacent to the railway corridors.

We would like to thank you for the opportunity to comment on the Official Plan. We look forward to continuing to work with the Township of Ramara.

Please forward all future communications, land development applications and documents to proximity@cn.ca

Yours very truly,

PROXIMITY

Alexandre Thibault Associé en urbanisme / Urban Planner Associate B.Sc. Urb

E+ proximity@cn.ca

From: Tahya Graham <<u>tgraham@ramara.ca</u>> Sent: Friday, July 12, 2024 9:32 AM Cc: Jennifer Stong <<u>JStong@ramara.ca</u>>; Walied Zekry <<u>WZekry@ramara.ca</u>>; Karissa Barker <<u>KBarker@ramara.ca</u>> Subject: Notice of Public Meeting - Township of Ramara Official Plan

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AVERTISSEMENT : ce courriel provient d'une source externe au CN : NE CLIQUEZ SUR AUCUN lien ou pièce jointe à moins de reconnaître l'expéditeur et d'avoir VÉRIFIÉ la sécurité du contenu

Good Morning,

Please see the attached Notice of Public Meeting for the Township of Ramaras Official Plan.

The Official Plan is available for viewing at <u>www.ramara.ca/opr</u>

If you have any question regarding this notice, please reach out to Planning@ramara.ca

Thank you,

 Tahya Graham, BA

 Planning Administrative Assistant

 P.O. Box 130
 Brechin, Ontario

 LOK 180

 P: 705-484-5374 ext. 238 | F: 705-484-0441

 E: tgraham@ramara.ca | W: www.ramara.ca | ⑦ ③ ¥ 🖬

Find your Zoning!

The Ramara Zoning Bylaw is now available on our <u>Mapping!</u> Click <u>here</u> to access user instructions and the video tutorial. You can also click <u>here</u> to access the complete **Zoning Bylaw and Amendments**. Additionally, click <u>here</u> to view our current **Official Plan & Schedules**, and learn more about our **Draft Official Plan here**. **Planning Applications & Fees** can be accessed <u>here</u>. If you would like to submit a Planning application in person, please email <u>planning@ramara.ca</u> to schedule an appointment.

Our Office is open Monday through Friday from 9:00 a.m. to 4:30 p.m. To access services after hours, visit our <u>online services</u> page or visit our <u>website</u> for all the latest news and information. Remember to <u>stay informed</u> and <u>subscribe</u> to receive up to date information by email.

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2297 Highway 12, PO Box 130 Brechin, Ontario LOK 1B0 p.705-484-5374 f. 705-484-0441

December 16, 2024

Alexandre Thibault Urban Planner Associate, WSP On Behalf of Canadian National Railway Company (CN) Sent by email:

RE: Township of Ramara Official Plan Update Canadian National Railway Company

The Township has reviewed the attached correspondence received July 18, 2024 regarding the Township of Ramara Official Plan Update provide the following response:

- 1. The definitions of Rail Facilities and Sensitive Land Uses have been added to the definitions section
- 2. Schedule F (Transportation) now includes a 300m buffer around rail lines as requested
- 3. The development policies requested for specific regulations for developments in proximity to rail facilities has been included in the final draft. These can be found in Section 6.1.14.

The Township appreciates the time spent reviewing the Draft Official Plan and comments provided. Should you require any further assistance or information, please contact the undersigned.

Respectfully submitted,

Jennifer Stong, BA, CPT Planner Township of Ramara jstong@ramara.ca 705-484-5374 ext 251

Cc: Jennifer Connor, Clerk, Township of Ramara Walied Zekry, Director of Building and Planning/ Chief Building Official



July 25, 2024

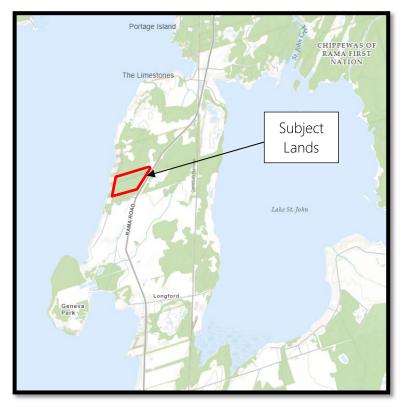
Walied Zekry, Director of Building and Planning Township of Ramara 2297 Highway 12, PO Box 130, Brechin, ON, LOK 1B0

Dear Walied;

RE: **Initial Review of New Official Plan** 6637 Quarry Point Road – Township of Ramara **OUR FILE 21438A**

On behalf of our Client, Roger Winter, please accept the following as comments on the First Draft of the New Township of Ramara Official Plan ("New OP") with respect to the lands municipally known as 6637 Quarry Point Road ("subject lands"). The subject lands are illustrated on Figure 1.

Figure 1: Location Map



705-728-0045



The comments included below are preliminary and our Client reserves the right to comment further on the development of the New OP.

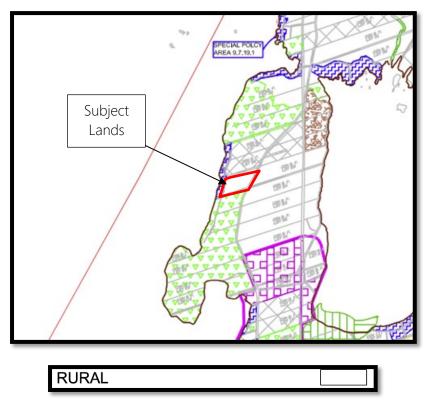
Background

The subject lands are situated on the east side of Rama Road, south of Maple Avenue, north of Quarry Point Road. The property has 258 meters of frontage on Maple Avenue and is 9.1 hectares in size. The property is predominantly wooded and a watercourse traverses the southern portion of the property. The property is currently vacant. It is our understanding that historically there has been a single detached dwelling on the property that was destroyed by a fire. Our Client has not replaced that dwelling at this time, but intends to develop the lot in the future.

Current Township of Ramara Official Plan

Under the current Township of Ramara Official Plan the subject lands are designated "Rural" as illustrated on Schedule 'A' – Land Use Plan, as Shown in Figure 2

Figure 2: Excerpt from Schedule "A" Land Use Plan - Current Official Plan

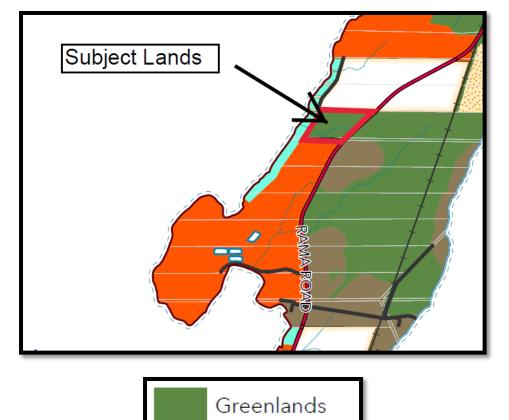


The permitted uses in the Rural designation of the current Official Plan include: farming, agricultural use, accessory single detached dwelling on a farm, second dwelling on a farm, non-farm single detached dwelling (surplus farm house and lot for retiring farmer), on-farm business, home occupation use, equestrian use, kennel, rural residential cluster, countryside residential subdivision, agriculturally related commercial and industrial use, small-scale commercial, industrial and institutional use, active and passive recreation, public park, management of natural areas and natural resources for environmental management purposes, public and private infrastructure, utilities, and accessory uses.

Proposed Draft Official Plan

The subject lands are proposed to be designated "Greenlands" as shown on Schedule 'A1' "Land Use" of the draft version of the New OP, as shown in **Figure 3**.

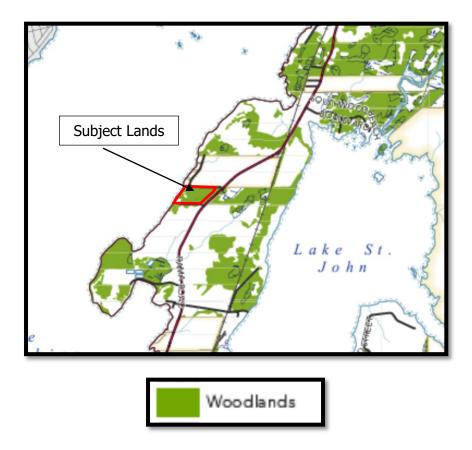
Figure 3. Excerpt from Schedule "A1" "Land Use" in draft new Official Plan



The permitted uses under the proposed "Greenlands" designation are limited to Agricultural uses, excluding buildings and structures, management of natural areas, including buildings and structures for environmental management purposes, and passive recreation, excluding buildings and public and private infrastructure.

In addition, on Schedule "A2" "Natural Area Framework" of the draft version of the New OP illustrates a "Woodlands" overlay on the subject lands as illustrated in Figure 4.

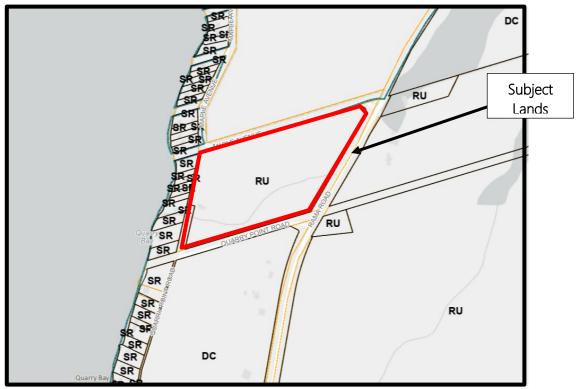
Figure 4: Excerpt from Schedule "A2" "Natural Area Framework" in the draft new Official Plan



Current Zoning By-law

The Subject Lands are zoned as Rural in the Township Zoning By-law as illustrated in Figure 5. The down designation of the Subject Lands in the new OP would lead to the eventual down zoning of the lands, limiting the use of the property which would decrease the value and usability of the property. This is not in my client's interest or in the public interest.

Figure 5: Excerpt from Ramara GIS "Zoning By-law"



Our comments on the New OP can be summarized as follows:

- 1. The current Rural designation should be maintained on the subject lands for the following reasons:
 - a) Maintaining the rural designation permits a wider range of uses which could contribute to the local economy;
 - b) Maintaining the rural designation protects the property value which is a significant financial consideration for the landowner;
 - c) The land owner has demonstrated a commitment to environmental stewardship on the property and maintaining the rural designation encourage responsible land use without the need for restrictive Greenlands policies;
 - d) Maintaining the rural designation provides flexibility for future planning to accommodate the changing needs and priorities of the community and property owner;
 - e) Maintaining the rural designation supports balanced growth ensuring that conservation efforts do not stifle economic opportunities and community development.
- 2. The "Woodland" overlay currently depicted on the subject lands on Schedule 'A2' should be removed for the following reason:
 - a) Section 6.2.4 lists the natural features and their functions recognized by the Plan. Included in that list are 'Significant Woodlands'. The section also notes that Schedule

'A2' "*identifies these features are mapped by the MNRF*" which suggests that the subject lands are host to a significant woodland. We note however that Section 6.2.13 'Significant Woodlands' states that, "*wooded areas within the Township have not yet been evaluated to determine their significance*...." Accordingly, illustrating the property as hosting a significant woodland as depicted on Schedule 'A2' is premature at this time as the woodlands on the site have not been identified as a significant woodlands.

- 3. The Zoning By-law zones the subject lands as rural. The proposed Greenlands designation would lead to the eventual down-zoning of the subject lands which exhibits rural characteristics and is not in the public interest.
- 4. The down-designation of the subject lands is not in the public interest for the reasons outlined in this correspondence.

We thank you for your consideration of our comments and look forward to the opportunity to review the comment with you. Should you have any questions regarding the comments above, please do not hesitate to contact us.

Yours truly, **MHBC**

Lee Bull, B.A., MCIP, RPP, Associate

Jamie Robinson, BES, MCIP, RPP Partner



December 16, 2024

MHBC Planning, Urban Design & Landscape Architecture

Sent by email:

Attn: Lee Bell, B.A., MCIP, RPP and Jamie Robinson, BES, MCIP, RPP

RE: Township of Ramara Official Plan Update 6637 Quarry Point Road

The Township has reviewed your correspondence dated July 25, 2024 regarding the Township of Ramara Official Plan Update as it relates to 6637 Quarry Point Road on behalf of Roger Winter and provide the following response:

Greenlands Designation

As stated in **Section 6.2.3**, the Greenlands Designated has been applied to this property as a conformity exercise as lands designated Greenlands within the County Official Plan have been designated on **Schedule 'A1'** of the Township of Ramara Official Plan.

The Greenlands Designation in the Township of Ramara Official Plan identifies the Natural Heritage System of the Township on **Schedule** 'A1'.

Permitted uses, now found in **Section 7.2.2**, have been reviewed since the draft published originally and are listed below:

- agricultural uses,
- agricultural-related uses
- on-farm diversified uses
- management of natural areas, including buildings and structures for environmental management purposes
- passive recreation, excluding buildings
- subject to demonstrating that the lands are not within a *prime agricultural* area, residential dwelling units on lots which were approved prior to May 9, 2016
- public and private infrastructure
- utilities

Natural Heritage Features and Areas

Schedule 'A2' identifies natural heritage features and areas identified by the Ministry and Natural Resources and Forestry (MNRF). Without the benefit of a Conservation Authority in this area, the Township relies on the mapping provided by the MNRF for identification of natural features. This mapping shows the subject property to be within Ecoregion 6E and identifies a wooded area on the property.

The identification of these features triggers a review of the feature as part of an application under the *Planning Act* to determine the significance of the feature to ensure that provincial policy is upheld.

Section 6.2.6.1 states: It is recognized that the mapping used to create Schedules 'A1' and 'A2' may be subject to refinement based on site visits and site-specific evaluations.

Considering the above, it would be premature to remove the mapping of natural heritage features or the Greenlands Designation of the subject property without site-specific evaluations and technical justification.

The Township appreciates the time spent reviewing the Draft Official Plan and comments provided. Should you require any further assistance or information, please contact the undersigned.

Respectfully submitted,

Jennifer Stong, BA, CPT Planner Township of Ramara jstong@ramara.ca 705-484-5374 ext 251

Cc: Jennifer Connor, Clerk, Township of Ramara Walied Zekry, Director of Building and Planning/Chief Building Official

Commenting Matrix Official Plan Draft 2024



Property: Proposal: Date Sent:	Township Wide Draft Official Plan December 16, 2024	Commenting Matrix to identify how the MTO comments received August 2, 2023 and Addressing MTO Comments Updated with final comments addressed December 10, 2024			
Comment #	MTO Comment	O.P Section	Response		
1.	Please refer to the attached MTO OP Review Guideline and incorporate where appropriate. The OP should include wording contained in various sections of MTO's OP Guideline, including that listed in our sections 3.1, 3.3.7, 3.3.9, 3.3.10, 3.3.11, 3.3.13.	3.1 - 6.7 3.3.7 - 6.1.13 3.3.9 – 5.4.8 3.3.10 – N/A 3.3.11 – 6.1.9.1.a 3.3.13 – 5.12 speaks to Renewable Energy, heights and setbacks to be in ZB	All comments have been addressed		
2.	Please include the following policy under the General Provisions section of the OP, to notify landowners adjacent to a provincial highway of the mandate of MTO: "In addition to all the applicable municipal requirements, all proposed development located adjacent to and in the vicinity of a provincial highway within MTO's permit control area under the Public Transportation and Highway Improvement Act (PTHIA) will also be subject to MTO approval. Early	6.7.2 Page 54	Addressed.		

	consultation with the MTO is encouraged to ensure the integration of municipal planning initiatives with provincial transportation planning. Any new areas in the municipality identified for future development that are located adjacent to or in the vicinity of a provincial highway or interchange/intersection within MTO's permit control area will be subject to MTO's policies, standards and requirements. Direct access will be discouraged and often prohibited."		
3.	Schedule A1 – Land Use: the Brechin Settlement Area appears to have expanded westerly in relation to the current OP (to now include lands west of the railway, on the north side of Ramara Rd. 47; we note that the road name on Schedule 1A looks to be incorrectly labelled as Simcoe Rd., west of Hwy 12). We understand that the Township may have plans for a Secondary Plan study for these lands, however it may be premature to show these lands within the Settlement Area in the OP until a	7.5 Page 69	This settlement boundary adjustment was approved by the OLT in 2023 at the County Official Plan level. This area has been updated to reflect that Order.

	Secondary Plan has been adopted and approved.		
4.	Schedule A1 references "See Section 7.8.8.1" for lands NW of Hwy 12 / Conc. Rd. A in Gamebridge, but this section does appear to be in the draft OP. The lands in question appear to be the James Dick Mara Quarry.	7.9.7.1 Page 102	James Dick Construction – Special Designations – will be updated
5.	MTO recommends that the OP Update be supported by a municipal – wide Transportation Master Plan (if not for the entire Township then at least to deal with growth planned for in Brechin and Atherley – Uptergrove settlement areas, to assess potential growth impacts on the provincial highway network). In addition, it would be prudent to develop a strategy to recover costs / fund any highway improvements required to support growth / future development		Transportation Studies have been done for Brechin and Atherley areas.
6.	OP Sections on Lot Creation: we suggest that new commercial lots not be created for lots fronting a provincial highway unless access can be provided from a municipal road, and in accordance with MTO access spacing criteria, if applicable.	6.7	This section speaks to development within the MTO permit control area and notes that direct access to Provincial Highways will be discouraged.
7.	OP Section 5.4 / Stormwater Management: we suggest that	5.4.8 Page 24	Addressed.

	wording from MTO OP Guideline Section 3.3.9 be included here.		
8.	OP Section 5.8 / Road Transportation: please reference MTO's March 2014 Bikeways Design Manual.	5.8.20	Addressed.
9.	OP Section 6.1.13 / Home Occupation: please reference here MTO OP Guideline Section 3.3.7.	6.1.13.7	Addressed.
10.	OP Section 7.4 / Rural: unless municipal road access is available, we recommend that no new small scale commercial uses be permitted within the Rural zone for sites fronting on a provincial highway, as no new commercial highway access will be permitted.	7.4.5	Addressed.
11.	OP Section 7.5.14.3 / Atherley - Uptergrove: please identify here that all development lands fronting on or within MTO permit control area for Highway 12 will be subject to MTO review and approvals.	6.7	This is included in Section 6.7
12.	Subsection 3. Noble (OPA 47 viii (a) 1 - references a need for improvements to the Highway 12 / Plum Point Rd. intersection. This looks to be in association with the Lake point Village residential development, for which MTO have not required improvements at this intersection (developer will however be constructing a new access road	Page 77	This wording was carried over from the original amendment. This is regarding the access at Highway 12 for the Lakepoint Village/Uptergrove Estates.

to intersect with Highway 12). Please clarify the reference to the Highway 12 / Plum Point Rd. intersection.			
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03-06-24 Email

I think it would be best if we complete our review and comment on the recently submitted Atherley Transportation Study (Draft Needs & Justification, February 21, 2024) before commenting on the proposed designations shown for Residential and Commercial. I note that the attached Fountain Dr. site is not included within the Residential designation, and appears to not be included in the transportation study. **Township Response: Fountain Drive is included in the residential designation of the OP**.

Is the Township therefore considering an OPA to have it included in a Residential designation? **Township Response: Not required. See above**

Additional developments in the Uptergrove area, not shown in the Residential designation on the Secondary Plan, include the Lakepoint Village site plan, and the Highland Mills draft plan of subdivision, both situated east of Plum Point Rd. and west of Muley Point Rd. Are these sites reflected in the OP update? **Township Response: Yes**

Also, I'm not sure about the Institutional designation. Is that to reflect existing or proposed uses? **Township Response: This is proposed/existing. The south east corner is the Ramara Center. This area is designated as the future community institutional area to have parks and a future school site etc.**

Other than the existing Township office and library, these lands appear to be agricultural or rural, and development of these lands does not appear to be addressed in the transportation study. Township Response: Any developments will require updated traffic studies to identify any changes or improvements required based on the development of this area.

In addition, you might want to consider labelling Highway 12 and key municipal roads if you are updating Secondary Plan Map 1. **Noted. Highway 12 added**

ltem	OP Section	Page Number	Comment	Township Response
1.	-	-	MTO recommends that any planning measures align with <u>Ontario's Freight Supportive Guidelines</u> as it pertains to truck routes and delivery of goods and services to the local community.	
2.	3.10, Transportation	p.15 - 16	MTO recommends consulting the <u>Provincial</u> <u>Policy Statement</u> (PPS) 1.6.8.2 to consider adding an objective regarding the protection of corridors.	Addressed in 3.10.5
3.	3.10, Transportation	p.15 - 16	MTO recommends consulting PPS 1.6.7.1 to consider adding an objective that ensures the necessary infrastructure is provided to support current and projected needs.	Addressed in 3.10.3
4.	3.10, Transportation	p.15	MTO recommends reflecting some of the objectives under 3.3 "Community Well-Being and Accessibility" in Section 3.10 "Transportation". For example, Section 3.3. speaks to parks and public facilities being readily accessed and used by everyone. We suggest having a similar objective for transportation infrastructure in Section 3.3 or Section 3.10.	Addressed in 3.10.6
5.	3.10, Transportation 5.8, Road Transportation	p. 15 p. 27 - 29	MTO recommends that the township explicitly consider policies for designing active transportation infrastructure to connect the Mnjikaning (Chippewas of Rama) First Nation Reserve into the regional transportation network. This is consistent with Section 1.6.7.1 of the PPS.	Addressed in 3.10.11

ltem	OP Section	Page Number	Comment	Township Response
6.	3.10, Transportation 5.8, Road Transportation	p. 15 p. 27 - 29	MTO recommends that the Township include a general objective and policies related to planning for and managing the movement of freight on the key routes and corridors and at facilities identified within the Strategic Goods Movement Network (SGMN) in <u>Connecting the GGH: A</u> <u>Transportation Plan for the Greater Golden</u> <u>Horseshoe</u> (Connecting the GGH) to result in multi-jurisdictional awareness, collaboration and coordination across the goods movement sector, not limited to within the township. This is consistent with Sections 1.6.7.1, 1.6.8.1 and 1.6.8.2 of the <u>Provincial Policy Statement</u> (PPS). It should be noted that the SGMN in Connecting the GGH is subject to refinements and updates with input from municipalities.	Addressed in 5.8.2 and 5.8.3 – December 10, 2024
7.	3.10, Transportation , section 3	p.16	MTO recommends including the wording "and users of micromobility modes (e.g., kick scooters, skateboards)" after "cyclists".	Added to 3.10.6
8.	 4.1, Settlement Area Objectives, section 6 7.5.7; Parking Facilities 	p. 17 p. 69	Note that bicycles and other micromobility devices are included in the definition of "vehicles" in the <u>Highway Traffic Act</u> . Based on the context of the referenced sections, it appears that the OP is referring only to motor vehicle traffic. If so, "motor vehicle traffic" should be used instead of "vehicular traffic".	Section 4.1 and 7.5.7 updated.

ltem	OP Section	Page Number	Comment	Township Response
	7.9.11, Special Designations, section 1.b, section 2.e	p.96	In addition, MTO recommends policy modifications to capture minimizing conflicts between all road users (motorists, micromobility users and pedestrians) For example: 4.1.6: Develop a local road system for safe and convenient local vehicular motor vehicle traffic and that and pedestrian traffic movement and minimizes vehicular — pedestrian conflicts; among all road users.	
9.	5.8, Road Transportation	p. 27 - 29	MTO recommends this section include a provision for the planning and development of infrastructure required for emerging technologies, such as electric charging stations, within off-street parking facilities. This will support a diversity of transportation options for those living, working, and playing within the township. This is consistent with Section 1.6.7.1 of the PPS.	Added 5.8.17
10.	5.8, Road Transportation	p. 27 - 29	MTO recommends this section specifically mention the improvement of safety of off-street parking facilities and transit facilities through design-based interventions, such as the <u>Crime</u> <u>Prevention Through Environmental Design</u> (CPTED) approach. An example could include adding lighting to transit facilities. This is consistent with Section 1.6.7.1 of the PPS.	Added 5.8.23

ltem	OP Section	Page Number	Comment	Township Response
11.	5.8, Road Transportation	p. 29	MTO recommends that the township includes policies to acknowledge and plan for active transportation connections into, where possible, transit services that neighbour the township. Specifically, MTO suggests that the township acknowledge existing and new regional bus connections, including the Ontario Northland inter-city bus service which serves a stop in neighbouring Washago, and the VIA Rail Northeastern Passenger Rail Service, which also serves a stop in Washago, as depicted in Map 5: Current, Planned and Conceptual Future Transit Infrastructure and Services in Connecting the GGH. This is consistent with Section 1.6.7.2 and 1.6.7.3 of the PPS.	Added to Section 3.10
12.	5.8, Road Transportation, section 18 Schedule F – Transportation	p. 29	 MTO recommends including a depiction of the segments of the <u>Province-Wide Cycling Network</u> (<u>PWCN</u>) that runs through the township within Schedule F – Transportation. MTO also recommends that the segment of the PWCN that runs through the township be explicitly acknowledged in Section 5.8, with consideration given as to how local and regional cycling networks can strengthen one another. The promotion of regional active transportation networks, in addition to the local network, may strengthen initiatives related to mobility, health, recreation, tourism, and economic development 	Added to 5.8.24 Included in Schedule F December 10, 2024

ltem	OP Section	Page Number	Comment	Township Response
			within the township, neighbouring municipalities, and Simcoe County more broadly.	
13.	7.5.5, Settlement Form	p. 68 - 69	As the Village Settlement Area land use type is where intensification in the township will be focused, and considering that the township's population experienced a 9.4% change between 2016 and 2021 according to Census data, MTO recommends including policies to allow for the coordination of future development in this land use type with transit services where possible. MTO also recommends that the township explicitly allow for transit stations and/or transit infrastructure in this land use type in the future. These provisions will support the regional bus connection as depicted in Map 5 of Connecting the GGH which runs between an area with frequent local transit service in Orillia, through Atherley-Uptergrove, which is designated as a Village Settlement Area in Schedule A1, and on through Rural lands and Greenlands. This is consistent with Section 1.6.7.4 of the PPS.	Included in 4.1.3 Transit is also included in the definition of infrastructure. Public and Private infrastructure is permitted the Rural and Greenlands designation and would be permitted in an institutional zone within the Village Settlement Areas.
14.	7.12.3, Destination Commercial Areas, section 5	p. 109	Remove typo "December 17, 2007 12."	Removed.
15.	7.12.3, Destination	p. 110	MTO recommends revising the wording of "the implementation of urban design standards, including pedestrian and bicycle movements" to	Updated (7.13.3.7)

ltem	OP Section	Page Number	Comment	Township Response
	Commercial Areas, section 7		"the implementation of urban design standards that includes accommodation for safe and accessible pedestrian, bicycle and micromobility travel."	
16.	7.12.9, Design Principles, section 11	p. 117	Regarding the "ratio of 1 bicycle space for every 10 required vehicle parking spaces," MTO recommends that the Township consult <u>Ontario</u> <u>Traffic Manual, Book 18 – Cycling Facilities</u> and other sources as necessary for guidance about appropriate quantities of different kinds of bicycle parking.	Updated to reference OTM Book – December 10 2024
17.	9.0, Definitions	p. 128	MTO recommends including a definition of "active transportation" as per A Place to Grow: Growth Plan for the Greater Golden Horseshoe, section 7 (pg. 65).	added
18.	Schedule F - Transportation		MTO recommends including a depiction of the rail and highway portions of the Strategic Goods Movement Network (SGMN) identified in Connecting the GGH that are within the township in Schedule F – Transportation so that these corridors may be planned for and protected.	Included in Schedule F December 10, 2024



INNOVATIVE PLANNING SOLUTIONS

planners • project managers • land development

August 6, 2024

Township of Ramara Building and Planning 2297 Highway 12, PO Box 130 Brechin, ON, LOK 1B0

Attention:	Walied Zekry, Director of Building and Planning/Chief Building Official
Re:	Official Plan Review – Comment Letter Lake Ramara Investments Limited
	5850 Rama Road & 4250, 4312, 4317, 4318, 4323, 4324 Hopkins Bay Road
	Township of Ramara, County of Simcoe

On behalf of Lake Ramara Investments Limited (the Owner), Innovative Planning Solutions is pleased to submit the following comments relative to the Township of Ramara's Official Plan Review process, as it relates to lands municipally known as 5850 Rama Road & 4250, 4312, 4317, 4318, 4323, 4324 Hopkins Bay Road – these lands are referred to as being the 'Hopkins Bay Project' which has been under evaluation since the early 2000's.

Subject Lands

The subject lands are located within the western area of Ramara, with frontage along Lake Couchiching, within Ward 2. The lands combined possess an approximate area of 9.27 hectares (22.91 acres), with frontage on both Lake Couchiching, Hopkins Bay Road, Rama Road and Ojibway Drive. The lands contain a variety of existing uses, including a hotel and single detached dwellings. As per the Township's current Official Plan, the lands are designated Destination Commercial and Shoreline Residential Area within the Rama Road Special Development Area Secondary Plan. Per the Township's Zoning By-law, the lands are zoned Destination Commercial Hold (DC-H), Highway Commercial 3 (HC-3) and Shoreline Residential (SR) for Parts 1 to 10 on Reference Plan # 51R-29336 (Appendix A). The deed for these lands is included as Appendix B.

The surrounding land uses of this site include:

North: Rama First Nation, including single detached dwellings.

East: Rama Road and Agricultural Lands.

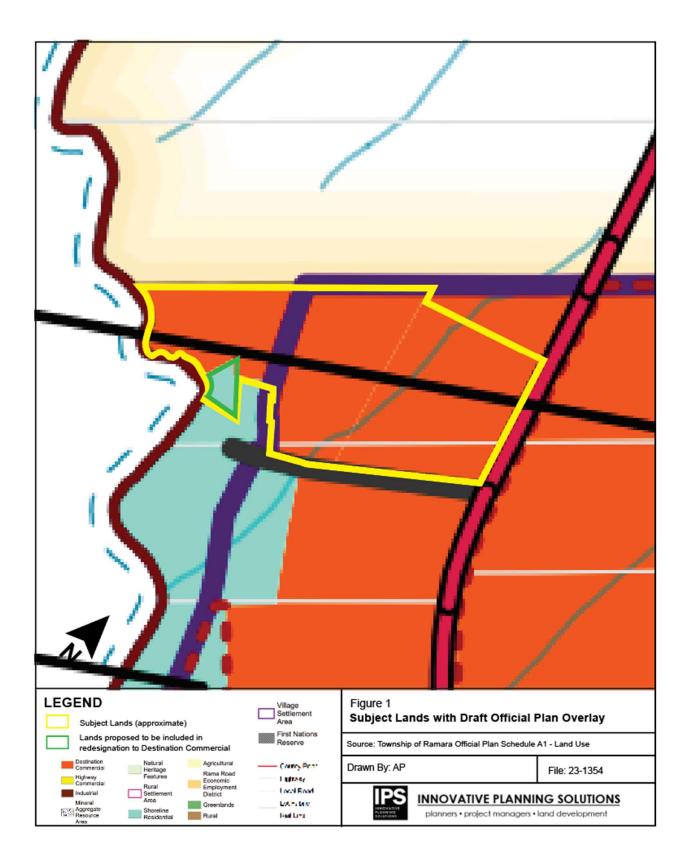
South: Agricultural lands, single detached dwellings (along Lake Couchiching Shoreline) and forested lands further south.

West: Lake Couchiching

Draft Official Plan

The Draft Official Plan (draft, July 2024), Schedule A1 proposes a Destination Commercial land use designation over the lands, while maintaining the Shoreline Residential designation over a small portion of the subject lands. **Figure 1** below illustrates the approximate property boundary within the context of the draft Official Plan, Schedule A1. It is believed the latest draft Official Plan erroneously excluded the small portion still possessing the Shoreline Residential designation (rather than Destination Commercial), as it has been a component of the proposed development for many years. Previous correspondence was issued to the Township in November 2023 requesting the Destination Commercial designation within the new Official Plan. Following Township receipt of this correspondence and further revisions to the draft Official Plan, most of the subject lands were changed to the Destination Commercial designation, save for this small portion.

It is hereby our request that the Township consider designating all of the subject lands (Parts 1to 10 on Reference Plan Number 51R-29336) as Destination Commercial. This would only represent approximatley an additional 0.58 acres of the 22.91 acre landholdings to be designated as Destination Commercial (approximately 0.58 acres of the subject lands are proposed to remain designated as Shoreline Residential in the Draft Official Plan).



This request would facilitate further Planning Act applications in the form of, at a minimum, a Zoning Bylaw Amendment over the lands on a site specific basis to implement the desired planning framework to permit the comprehensive redevelopment of the lands. The owner has a long history of development pursuit with respect to the subject lands, along with communication with the Township, dating back to the early 2000's. The owner continues to maintain strong communication with the Township and has prepared many technical studies in support of the proposed development (Hopkins Bay Development). The development would be subject to the same/similar technical studies as would otherwise be required if the lands were designated Destination Commercial or Shoreline Residential, however this request would eliminate the requirement for an Official Plan Amendment, and expedite the approvals process to bring housing to market sooner. Further, the development would also be subject to Site Plan Control, providing the municipality the necessary tools to ensure the lands are developed in accordance with applicable standards (assuming the necessary land use designations and zoning are in place).

Conclusion

Based on the above, we hereby request the Township consider designating all of the subject landholdings as Destination Commercial, in order to facilitate a subsequent Zoning By-law amendment application (and Site Plan Application) to ensure the proper and orderly development of the site in accordance with applicable Provincial and Municipal standards.

Trusting the above is satisfactory, we look forward to the review and consideration of the comments enclosed. Should you have any further questions or comments please do not hesitate to contact the undersigned.

Respectfully submitted, Innovative Planning Solutions

Ayush Patel Planner

Cameron Sellers
Partner

sen Kyle

Ryan Kyle Intermediate Planner

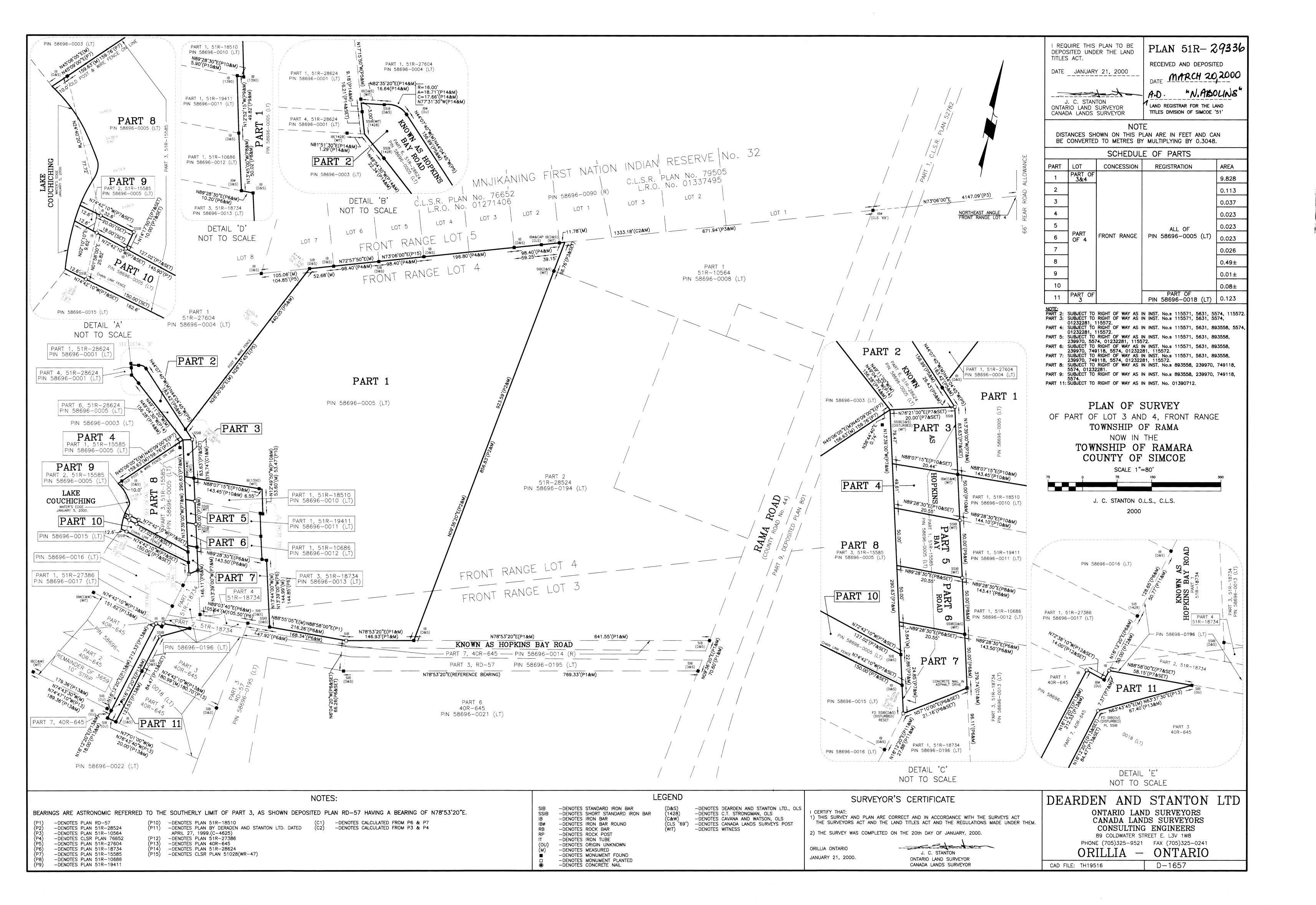
Attachments:

Appendix A – Reference Plan including Subject Lands (51R-29336)

Appendix B – Land Transfer/Deed for Subject Lands

APPENDIX A

REFERENCE PLAN # 51R-29336





2297 Highway 12, PO Box 130 Brechin, Ontario LOK 1B0 p.705-484-5374 f. 705-484-0441

December 16, 2024

Innovative Planning Solutions



Attn: Ayush Patel, Cameron Sellers, Ryan Kyle

RE: Township of Ramara Official Plan Update 5850 Rama Rd. and 4250, 4312, 4317, 4318, 4323 & 4324 Hopkins Bay Rd.

The Township has reviewed your correspondence dated August 6, 2024 regarding the Township of Ramara Official Plan Update on behalf of Lake Ramara Investments Limited regarding the above noted lands.

Schedule A1 - Land Use has been updated to apply the "Destination Commercial" designation to the lands municipally known as 5850 Rama Road, as well as 4250, 4312, 4317, 4318, 4323 and 4324 Hopkins Bay Road.

The mapping has been refined, and the "**Destination Commercial**" designation is now fully applied to properties **4312 Hopkins Bay Rd.** and **4317 Hopkins Bay Rd.**, in alignment with the other noted properties above.

The Township appreciates the time spent reviewing the Draft Official Plan and comments provided. Should you require any further assistance or information, please contact the undersigned.

Respectfully submitted,

Karissa Barker Planning Technician/Secretary-Treasurer, Committee of Adjustment Township of Ramara <u>kbarker@ramara.ca</u> 705-484-5374 ext. 222

Cc: Mayor and Council, Township of Ramara Jennifer Connor, Clerk, Township of Ramara MUNICIPAL, PLANNING & DEVELOPMENT LAW

9 August 2024

Sent via E-mail to ramara@ramara.ca and planning@ramara.ca

Clerk of the Township of Ramara 2297 Highway 12 Box 130 Brechin, Ontario, L0K 1B0

Attn: Jennifer Connor, Director of Legislative Services/Clerk

Dear Ms. Connor and Members of Council

Re: Township of Ramara – Official Plan Review Submission on the Final Draft Official Plan on Behalf of LCP (III) Lands Limited

We are counsel for LCP (III) Lands Limited ("LCP"). LCP owns a 411 hectares (1,017 acres) plot of land legally known as Lots 4, 5 and 6, Concession 6 and Lots 4 and 5, Concession 7 in the Township of Ramara (the "Township"), County of Simcoe. The property ("Dalrymple Lands") is located alongside and to the west and southwest of Lake Dalrymple outside of the Township's settlement area boundary and the prime agricultural area.

We understand that on 12 August 2024 Council of The Corporation of the Township of Ramara ("Council") will consider the final draft of the Ramara Official Plan ("Final Draft OP"). We have been actively participating in the Township's Official Plan Review process and have reviewed the Final Draft OP in the context of the Dalrymple Lands. We submit the comments below for Council's consideration.

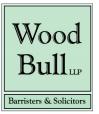
Background and Summary

By letter dated 16 November 2023, our office provided comments on behalf of LCP pertaining to the July 2023 draft of the Official Plan ("2023 Draft OP"). A copy of our previously submitted letter is attached for ease of reference.

Under the 2023 Draft OP, the Dalrymple Lands were proposed to be designated as "Rural". "Countryside Residential Subdivisions" are permitted on lands designated "Rural" under the Township's Existing Official Plan ("Existing OP"), however, in the 2023 Draft OP, this permission was removed. The Township had instead introduced Policy 7.4.7.8 which permitted "Plans of Subdivision" subject to certain requirements that the Dalrymple Lands did not meet, and which LCP considered overly restrictive. For this reason, we had requested that all policy permissions within the Existing OP for Countryside

Kim Mullin Direct: (416) 203-5633 kmullin@woodbull.ca

9 August 2024



Residential Subdivisions remain in any future draft of the new Official Plan in order to retain the development potential for the Dalrymple lands.

Regrettably, this request was not fulfilled and, instead, the Township has removed all permissions for residential subdivisions within the "Rural" designation under the Final Draft OP.

With this submission, we ask that the Final Draft OP be revised to continue to permit Countryside Residential Subdivisions within the Rural designation, for the reasons set out below.

Proposed Provincial Planning Statement ("Proposed PPS) and the Final Draft OP

As mentioned above, LCP had previously expressed concerns with Policy 7.4.7.8 under the 2023 Draft OP. Specifically, LCP had concerns that Policy 7.4.7.8 was overly restrictive and was not consistent with the rural subdivision policies in the Proposed PPS. The latest version of the Proposed PPS (dated 10 April 2024) continues to outline policies for rural land development in municipalities and permits lot creation for residential development as long as the appropriate infrastructure is provided. Specifically, proposed Policy 2.6.(c) states that:

On rural lands located in municipalities, permitted uses are:

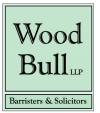
c) residential development, including lot creation where site conditions are suitable for the provision of appropriate sewage and water services.

We note that although the Dalrymple lands continue to be designated as "Rural" on Schedule A1 of the Final Draft OP, there is no longer any policy direction contemplating the development of residential subdivisions within the "Rural" designation. Instead, for lands designated as "Rural" under the Final Draft OP, Policy 7.4.7.2 states that:

7.4.7.2 - The creation of up to a maximum of two (2) lots by consent is permitted from a property as it legally existed on January 1, 1994

As such, the Final Draft OP continues to restrict LCP from developing its lands with a residential subdivision by limiting lot creation to two lots, with no additional policies or exceptions that would permit "Countryside Residential Subdivisions" as currently permitted under the Existing OP. The policies for lot creation in the "Rural" designation under the Final Draft OP continue to remain overly restrictive, are not consistent with the rural land development policies in the Proposed PPS and do not support the achievement of housing objectives in the Township.

9 August 2024



<u>Request</u>

We continue to request that the Dalrymple Lands be designated as "Rural" within the Final Draft OP and that the existing permissions for Countryside Residential Subdivisions outlined in Policy 4.4.2 within the Existing OP remain in the Final Draft OP for lands designated as "Rural". As mentioned, this would allow the Draft OP policies to better align with the policies proposed in the PPS as well as support the achievement of housing objectives in the Township.

We ask to be provided with notice of any decision of Council with respect to the Final Draft OP.

We thank you in advance for your consideration of these submissions.

Yours very truly,

Wood Bull LLP

r' Mulla.

Kim Mullin

KM/as

cc. Jennifer Strong Tahya Graham Karissa Barker client



2297 Highway 12, PO Box 130 Brechin, Ontario LOK 1B0 p.705-484-5374 f. 705-484-0441

December 16, 2024

Woodbull, LLP, Barristers & Solicitors



Attn: Kim Mullin

RE: Township of Ramara Official Plan Update Lots 4, 5 & 6 Concession 6 and Lots 4 and 5, Concession 7

The Township has reviewed your correspondence dated August 9, 2024 regarding the Township of Ramara Official Plan Update on behalf of LCP (III) Lands Limited ("LCP") regarding the above noted lands. Land Use policies have been updated in Section 7.4 of the proposal Draft Official Plan. Specific lot creation policies can be found below. These provisions have been updated for consistency with the Provincial Planning Statement which came into effect on October 20, 2024.

7.4.7 Lot Creation

1. The creation of a lot is subject to Section 6.1.12 of this Plan and the provisions of the Zoning By-law.

2. The creation of up to a maximum of two (2) lots by consent is permitted on a property as it legally existed on January 1, 1994.

3. New residential lots shall be limited in size and have a maximum area of 1 hectare.

a. New residential lots shall be zoned to "Rural Residential"

4. Lot creation that extends existing strip development along rural residential roads shall be restricted.

5. Notwithstanding the above, opportunities for infilling within existing rural residential corridors/strips shall be encouraged where two existing residentially used lots on the same side of the road are found within a maximum of 90 metres (300 feet).

6. Residential lot creation of multiple lots may be supported through Special Policy amendment to the Official Plan and shall be implemented by plan of subdivision and/or

plan of condominium and by Zoning By-law amendment where it has been demonstrated that:

a. Site conditions are suitable for the provision of individual on-site water and sewage services (Section 5.1 and 5.2)

b. The development can be sustained by rural service levels

c. The development is appropriate to the infrastructure which is planned or available; avoiding the need for uneconomical expansion of this infrastructure

d. the proposed development has demonstrated compatibility with surrounding land uses

7. New or expanded lots for permitted uses shall conform with the provisions of this Plan, Minimum Distance Separation and the Zoning By-law.

The Township appreciates the time spent reviewing the Draft Official Plan and comments provided. Should you require any further assistance or information, please contact the undersigned.

Respectfully submitted,

Jennifer Stong, BA, CPT Planner Township of Ramara jstong@ramara.ca 705-484-5374 ext 251

Cc: Mayor and Council, Township of Ramara Jennifer Connor, Clerk, Township of Ramara Walied Zekry, Director of Building & Planning/CBO, Township of Ramara



August 12, 2024

Jennifer Connor, Clerk Township of Ramara 2297 Hwy 12, PO Box 130 Brechin, ON LOK 1B0 Mayor and Council Township of Ramara 2297 Hwy 12, PO Box 130 Brechin, ON LOK 1B0

Dear Mayor, Council and Ms. Connor;

RE: Township of Ramara Official Plan Updates – LCP Quarry Limited Proposed Brechin Quarry OUR FILE 12135B

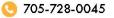
On behalf of our Client, LCP Quarry Limited, MacNaughton Hermsen Britton Clarkson ('MHBC') is pleased to submit the comments regarding updates to the Township of Ramara Official Plan (Draft July 5, 2024). As the Township is aware, LCP Quarry Limited has submitted Planning Act and Aggregate Resources Act ('ARA') applications on lands located at Part of Lots 11, 12 and 13, Concession 1, Former Geographic Township of Mara, Township of Ramara, County of Simcoe to permit the proposed Brechin Quarry. This letter is being submitted in accordance with Section 17 (24) of the Planning Act to provide comments on the draft new Official Plan.

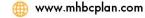
Comments on current Brechin Quarry application:

• LCP Quarry Limited requests transition policies be included in the Draft Official Plan to recognize existing applications to the current Official Plan. Furthermore, we request the Draft Official Plan schedules be updated to label the subject site as being subject to the existing approved Official Plan. The Repeal and Replace by-law for this Official Plan should also contain language to identify that the subject site remains subject to the existing approved Official Plan.

General Comments on Draft Official Plan:

- Objective 3.9.4 speaks to the involvement and/or consultation of neighbouring municipalities regarding aggregate haul route agreements.
 - **The proposed objective states:** "Neighbouring municipalities should be involved and/or consulted if aggregate haul route agreements are being established that would direct truck traffic to roads in those municipalities."
 - **MHBC comment:** Reference to "aggregate haul route agreements" should be deleted. An aggregate haul route agreement should only be required when improvements to the entrance/exit or haul route are required to accommodate the proposed mineral aggregate operation.





- Policy 6.3.4.8 speaks to a Natural Area designation.
 - **The proposed policy states:** "New or expanded mineral aggregate operations are prohibited in areas designated Natural Area, regardless if the lands are identified as HPMARAS on Schedule 'D'."
 - MHBC comment: It appears that there is no "Natural Area Designation" in the Draft OP or the Schedules. Please clarify. Furthermore, the policy should be updated since natural areas are not an automatic prohibition for mineral aggregate operations. In accordance with Provincial Policy, mineral aggregate operations are only prohibited in Provincially Significant Wetlands and may be considered in other features subject to meeting certain criteria.
- Policy 6.3.4.9 speaks to where extraction may occur.
 - **MHBC comment:** this policy should be modified since it is inconsistent with other provisions of the Official Plan which state an Official Plan amendment would be required if the site is not already designated "Mineral Resource Extraction Area". Furthermore, other policies state aggregate extraction is permitted to occur outside of the HPMARA identified on Schedule D, subject to an Official Plan amendment.

A policy option could include stating that if the site is within the HPMARA, only a Municipal Zoning By-law Amendment would be required and if the site is outside of the HPMARA, both an Official Plan Amendment and Zoning By-law Amendment would be required.

- Policy 7.12.2 speaks to permitted uses in the Mineral Aggregate Extraction Area Designation.
 - **MHBC comment:** Aggregate recycling should be permitted on-site without the need for a Zoning By-law Amendment.
- Policy 7.12.4.4 speaks to Municipal Site Plan Approval.
 - **The proposed policy states:** "All new development in relation to mineral aggregate operations will be subject to Site Plan Approval."
 - **MHBC comment:** Mineral Aggregate Operations are not subject to Municipal Site Plan Approval as they are subject to site plans issued under the ARA. This policy should be deleted or modified to clarify that the site plan approval is in accordance with the Aggregate Resources Act.
- Policy 7.12.4.5 refers to Site Plan Amendments
 - **The proposed policy states:** "Any application under provincial statute to change, vary or add to the conditions in an existing licence and/or site plan that proposes to increase the tonnage limit of annual extraction and/or that proposes to extract aggregate below the groundwater table must comply with the Township's requirements according to Section 7.11.5 of this Plan, and in all applications, the Township shall send its comments and recommendations to the provincial agencies within the legislative comment periods."
 - **MHBC comment:** Section 7.11.5 refers to Official Plan Amendments for lands designated "Highway Commercial." Furthermore, this policy should be deleted as site

plan and licence amendments are to be completed in accordance with the requirements of the Aggregate Resources Act and are not subject to the provisions of the Municipal Official Plan unless a Zoning By-law Amendment is required to permit the use.

- Policy 7.12.4.7 speaks to OPA requirements.
 - MHBC comment: This policy should be modified to remove the reference to sections 6.2 and 6.3. We request that the natural environment policies specific to aggregate applications should be developed and included within section 7.12. This request is because mineral aggregate policies are subject to a separate natural heritage policy framework in provincial policy compared to other forms of development.
- Policy 7.12.5.1.b refers to Township requirements for an EIS.
 - **MHBC comment:** the reference to section 6.2 should be deleted and the natural heritage policies application to mineral aggregate applications should be included in section 7.12. (as mentioned above).
- Policy 7.12.5.1.c refers to requirements for consistency with the County and Township Official Plan.
 - **MHBC comment:** The policy should be revised to request "conformity" rather than be "consistent with".
- 7.12.5.e and 7.12.5.e.ii speaks to development agreements.
 - The proposed policy states: "e. Consideration of the use of the proposed operation compatible with existing and planned sensitive land uses in the area, the staging of extraction and rehabilitation within the proposed licenced area, the entering into a registered development agreement with the Township and such other relevant matters as the Township deems necessary such as: ii. if a public highway is to be used as a haul route, the appropriate road authority or authorities may require, in a suitable agreement, that any road improvements, the timing of road works, and the responsibilities for road maintenance during and after road construction are undertaken all at the expense of the operator of the pit or quarry;"
 - MHBC comment: The reference to a development agreement should be clarified to confirm that it is only required where works are required on County of Township land. The regulation of the site is to be in accordance with the requirements of the Aggregate Resources Act and the Municipal Act does not permit Municipalities to regulate mineral aggregate operations. Furthermore, reference to maintenance of the haul route in ii) should be removed since this is prohibited in accordance with the Section 12(1)(1.1) of the Aggregate Resources Act.
- Policy 7.12.5.1.f.vi speaks to off-site monitoring.
 - **MHBC comment:** this policy should be clarified that off-site monitoring is only applicable where it is deemed required and where the landowner provides access to complete the monitoring.

- Policy 7.12.6 speaks to Township monitoring of operations.
 - **MHBC comment:** Clarification should be provided to confirm that while the Township may monitor and provide comment, any determination of compliance in accordance with the Aggregate Resources Act is within the jurisdiction of the Ministry of Natural Resources.

We appreciate the opportunity to provide comment on the Draft Official Plan. Please do not hesitate to contact the undersigned should you have any questions or if there is any additional information that you require. We would be happy to meet with the Township to discuss our comments.

Yours truly,

MHBC

Blien Zerman

Brian Zeman, BES, MCIP, RPP President

cc. Scott Kirby, Symphony Golf Ltd. James Newlands, MHBC



December 16, 2024

MHBC Planning, Urban Design & Landscape Architecture

Attn: Brian Zeman, BES, MCIP, RPP

RE: Township of Ramara Official Plan Update LCP Quarry Limited

The Township has reviewed your correspondence dated August 13, 2024 regarding the Township of Ramara Official Plan Update on behalf of LCP Quarry Limited and provide the following responses:

MHBC Comment:

Comments on current Brechin Quarry application:

LCP Quarry Limited requests transition policies be included in the Draft Official Plan to recognize existing applications to the current Official Plan. Furthermore, we request the Draft Official Plan schedules be updated to label the subject site as being subject to the existing approved Official Plan. The Repeal and Replace by-law for this Official Plan should also contain language to identify that the subject site remains subject to the existing approved Official Plan

Township Response:

Transition policies have been included in Implementation, please see Section 8.18 Transition.

MHBC Comment:

Objective 3.9.4 speaks to the involvement and/or consultation of neighbouring municipalities regarding aggregate haul route agreements.

- **The proposed objective states**: "Neighbouring municipalities should be involved and/or consulted if aggregate haul route agreements are being established that would direct truck traffic to roads in those municipalities."
- **MHBC comment**: Reference to "aggregate haul route agreements" should be deleted. An aggregate haul route agreement should only be required when improvements to the entrance/exit or haul route are required to accommodate the proposed mineral aggregate operation.

Township Response:

Policy 3.9.4 has been updated to state "Neighbouring municipalities should be involved and/or consulted if aggregate haul routes are being established that would direct truck traffic to roads in those municipalities."

The purpose of this section is to note that for planning applications where haul routes are likely to impact adjoining municipalities that the adjacent municipality is circulated on the application.

MHBC Comment:

Policy 6.3.4.8 speaks to a Natural Area designation.

- **The proposed policy states**: "New or expanded mineral aggregate operations are prohibited in areas designated Natural Area, regardless if the lands are identified as HPMARAS on Schedule 'D'."
- **MHBC comment**: It appears that there is no "Natural Area Designation" in the Draft OP or the Schedules. Please clarify. Furthermore, the policy should be updated since natural areas are not an automatic prohibition for mineral aggregate operations. In accordance with Provincial Policy, mineral aggregate operations are only prohibited in Provincially Significant Wetlands and may be considered in other features subject to meeting certain criteria.

Township Response:

Natural Resources policies have been renumber from 6.3 to 6.5. This policy has been removed entirely.

MHBC Comment:

Policy 6.3.4.9 speaks to where extraction may occur.

MHBC comment: this policy should be modified since it is inconsistent with other provisions of the Official Plan which state an Official Plan amendment would be required if the site is not already designated "Mineral Resource Extraction Area". Furthermore, other policies state aggregate extraction is permitted to occur outside of the HPMARA identified on Schedule D, subject to an Official Plan amendment. A policy option could include stating that if the site is within the HPMARA, only a Municipal Zoning By-law Amendment would be required and if the site is outside of the HPMARA, both an Official Plan Amendment and Zoning By-law Amendment would be required.

Township Response:

This policy has been removed entirely.

MHBC Comment:

Policy 7.12.2 speaks to permitted uses in the Mineral Aggregate Extraction Area Designation.

- **MHBC comment**: Aggregate recycling should be permitted on-site without the need for a Zoning By-law Amendment.

Township Response:

Mineral Aggregate Extraction Policies have been renumbered from 7.12 to 7.13 Recycling is included in permitted uses in bullet 5.

MHBC Comment:

Policy 7.12.4.4 speaks to Municipal Site Plan Approval.

- **The proposed policy states**: "All new development in relation to mineral aggregate operations will be subject to Site Plan Approval."
- MHBC comment: Mineral Aggregate Operations are not subject to Municipal Site Plan Approval as they are subject to site plans issued under the ARA. This policy should be deleted or modified to clarify that the site plan approval is in accordance with the Aggregate Resources Act.

Township Response:

This section has been removed entirely

MHBC Comment:

Policy 7.12.4.5 refers to Site Plan Amendments

- **The proposed policy states:** "Any application under provincial statute to change, vary or add to the conditions in an existing licence and/or site plan that proposes to increase the tonnage limit of annual extraction and/or that proposes to extract aggregate below the groundwater table must comply with the Township's requirements according to Section 7.11.5 of this Plan, and in all applications, the Township shall send its comments and recommendations to the provincial agencies within the legislative comment periods."
- **MHBC comment**: Section 7.11.5 refers to Official Plan Amendments for lands designated "Highway Commercial." Furthermore, this policy should be deleted as site plan and licence amendments are to be completed in accordance with the requirements of the Aggregate Resources Act and are not subject to the provisions of the Municipal Official Plan unless a Zoning By-law Amendment is required to permit the use.

Township Response:

7.13.4.4 states "The Township shall send comments and recommendations to the provincial agencies within the legislative commenting period relating to any application under provincial statute to change, vary or add to the conditions in an existing licence and/or site plan that proposes to increase the tonnage limit of annual extraction and/or that proposes to extract aggregate below the groundwater table"

Improperly numbered sections have been updated in the final draft.

MHBC Comment:

Policy 7.12.4.7 speaks to OPA requirements.

 MHBC comment: This policy should be modified to remove the reference to sections 6.2 and 6.3. We request that the natural environment policies specific to aggregate applications should be developed and included within section 7.12. This request is because mineral aggregate policies are subject to a separate natural heritage policy framework in provincial policy compared to other forms of development.

Township Response:

This section has been removed entirely

MHBC Comment:

Policy 7.12.5.1.b refers to Township requirements for an EIS.

- **MHBC comment**: the reference to section 6.2 should be deleted and the natural heritage policies application to mineral aggregate applications should be included in section 7.12. (As mentioned above).

-

Township Response:

7.1.5.1.b states "If required, the submission of an Environmental Impact Study according to Natural Heritage policies."

MHBC Comment:

Policy 7.12.5.1.c refers to requirements for consistency with the County and Township Official Plan.

- **MHBC comment**: The policy should be revised to request "conformity" rather than be "consistent with". 7.12.5.e and 7.12.5.e.ii speaks to development agreements.

Township Response:

7.13.5.c states: "Demonstration that the proposed mineral aggregate extraction and rehabilitation are in conformity with the policies of the County of Simcoe Official Plan and this Plan;"

MHBC Comment:

The proposed policy states: "e. Consideration of the use of the proposed operation compatible with existing and planned sensitive land uses in the area, the staging of extraction and rehabilitation within the proposed licenced area, the entering into a registered development agreement with the Township and such other relevant matters as the Township deems necessary such as: ii. if a public highway is to be used as a haul route, the appropriate road authority or authorities may require, in a suitable agreement, that any road improvements, the timing of road works, and the responsibilities for road maintenance during and after road construction are undertaken all at the expense of the operator of the pit or quarry;"

- MHBC comment: The reference to a development agreement should be clarified to confirm that it is only required where works are required on County of Township land. The regulation of the site is to be in accordance with the requirements of the Aggregate Resources Act and the Municipal Act does not permit Municipalities to regulate mineral aggregate operations. Furthermore, reference to maintenance of the haul route in ii) should be removed since this is prohibited in accordance with the Section 12(1)(1.1) of the Aggregate Resources Act.

Township Response:

7.13.5.e states: "Consideration of the use of the proposed operation compatible with existing and planned sensitive land uses in the area, the staging of extraction and rehabilitation within the proposed licenced area, the entering into a registered development agreement with the Township where works are required on County or Township land and such other relevant matters as the Township deems necessary such as...."

MHBC Comment:

Policy 7.12.5.1.f.vi speaks to off-site monitoring.

- **MHBC comment**: this policy should be clarified that off-site monitoring is only applicable where it is deemed required and where the landowner provides access to complete the monitoring.

Township Response:

7.13.5.1.f.vi states "That the operator agrees to ensure off-site monitoring of private water supplies to meet quality and quantity standards and requirements and that appropriate mitigation measures are included in agreements with landowners, where required"

MHBC Comment:

Policy 7.12.6 speaks to Township monitoring of operations.

- **MHBC comment**: Clarification should be provided to confirm that while the Township may monitor and provide comment, any determination of compliance in accordance with the Aggregate Resources Act is within the jurisdiction of the Ministry of Natural Resources

Township Response:

Section 7.13.6 advises that the Township may provide comments to the provincial ministry as the licences are issued by the Ministry of Natural Resources and Forestry under the Aggregate Resources Act. The inclusion of the above recommended statement within the Official Plan text is not necessary.

The Township appreciates the time spent reviewing the Draft Official Plan and comments provided. Should you require any further assistance or information, please contact the undersigned.

Respectfully submitted,

Jennifer Stong, BA, CPT Planner Township of Ramara jstong@ramara.ca 705-484-5374 ext 251

Cc: Mayor and Council, Township of Ramara Jennifer Connor, Clerk, Township of Ramara Walied Zekry, Director of Building & Planning/CBO, Township of Ramara



September 27, 2024

Jennifer Connor, Clerk **Township of Ramara** 2297 Hwy 12, PO Box 130 Brechin, ON LOK 1B0

Mayor and Council Township of Ramara 2297 Hwy 12, PO Box 130 Brechin, ON LOK 1B0

Dear Mayor, Council and Ms. Connor;

Township of Ramara Official Plan Updates – The Sarjeant Co Ltd. RE: **OUR FILE 21511C**

On behalf of our Client, the Sarjeant Co Ltd., MacNaughton Hermsen Britton Clarkson ('MHBC') is pleased to submit the comments regarding updates to the Township of Ramara Official Plan (Draft July 5, 2024). The Sarjeant Co Ltd. owns lands located at Part of Lots 9 & 10, Concession C, Former Geographic Township of Rama, Township of Ramara, County of Simcoe and is municipally addressed as 6059 Pearl Carrick Road. This letter is being submitted in accordance with Section 17 (24) of the Planning Act to provide comments on the draft new Official Plan.

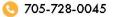
Specific Comments to Our Site:

- Schedule A1 changes the designation of our site from Rural in the existing Official Plan to Greenlands in the Draft Official Plan
 - **MHBC comment:** We understand the revision was made to ensure conformity with the County Official Plan designations. We trust that the policies in the Township Draft Official Plan will conform with the policies in the County Official Plan whereby mineral aggregate operations may be permitted subject to a municipal Official Plan amendment.
- Schedule A2 identifies wetlands throughout the site.
 - **MHBC comment:** Ecological fieldwork has been undertaken on this property to determine the extents of the on-site natural features. Once available, we would be happy to provide the Township with a copy of the digital files of the mapped on-site natural features so that the Township's Official Plan schedules can be updated to accurately identify on-site wetlands.

General Comments on Draft Official Plan:

 Objective 3.9.4 speaks to the involvement and/or consultation of neighbouring municipalities regarding aggregate haul route agreements.

💡 113 Collier Street, Barrie, ON | L4M 1H2





- **The proposed objective states:** "Neighbouring municipalities should be involved and/or consulted if aggregate haul route agreements are being established that would direct truck traffic to roads in those municipalities."
- **MHBC comment:** Reference to "aggregate haul route agreements" should be deleted. An aggregate haul route agreement should only be required when improvements to the entrance/exit or haul route are required to accommodate the proposed mineral aggregate operation.
- Policy 6.3.4.8 speaks to a Natural Area designation.
 - **The proposed policy states:** "New or expanded mineral aggregate operations are prohibited in areas designated Natural Area, regardless if the lands are identified as HPMARAS on Schedule 'D'."
 - MHBC comment: It appears that there is no "Natural Area Designation" in the Draft OP or the Schedules. Please clarify. Furthermore, the policy should be updated since natural areas are not an automatic prohibition for mineral aggregate operations. In accordance with Provincial Policy, mineral aggregate operations are only prohibited in Provincially Significant Wetlands and may be considered in other features subject to meeting certain criteria.
- Policy 6.3.4.9 speaks to where extraction may occur.
 - MHBC comment: this policy should be modified since it is inconsistent with other provisions of the Official Plan which state an Official Plan amendment would be required if the site is not already designated "Mineral Resource Extraction Area". Furthermore, other policies state aggregate extraction is permitted to occur outside of the HPMARA identified on Schedule D, subject to an Official Plan amendment.

A policy option could include stating that if the site is within the HPMARA, only a Municipal Zoning By-law Amendment would be required and if the site is outside of the HPMARA, both an Official Plan Amendment and Zoning By-law Amendment would be required.

- Policy 7.12.2 speaks to permitted uses in the Mineral Aggregate Extraction Area Designation.
 - **MHBC comment:** Aggregate recycling should be permitted on-site without the need for a Zoning By-law Amendment.
- Policy 7.12.4.4 speaks to Municipal Site Plan Approval.
 - **The proposed policy states:** "All new development in relation to mineral aggregate operations will be subject to Site Plan Approval."
 - **MHBC comment:** Mineral Aggregate Operations are not subject to Municipal Site Plan Approval as they are subject to site plans issued under the ARA. This policy should be deleted or modified to clarify that the site plan approval is in accordance with the Aggregate Resources Act.
- Policy 7.12.4.5 refers to Site Plan Amendments
 - **The proposed policy states:** "Any application under provincial statute to change, vary or add to the conditions in an existing licence and/or site plan that proposes to

increase the tonnage limit of annual extraction and/or that proposes to extract aggregate below the groundwater table must comply with the Township's requirements according to Section 7.11.5 of this Plan, and in all applications, the Township shall send its comments and recommendations to the provincial agencies within the legislative comment periods."

- MHBC comment: Section 7.11.5 refers to Official Plan Amendments for lands designated "Highway Commercial." Furthermore, this policy should be deleted as site plan and licence amendments are to be completed in accordance with the requirements of the Aggregate Resources Act and are not subject to the provisions of the Municipal Official Plan unless a Zoning By-law Amendment is required to permit the use.
- Policy 7.12.4.7 speaks to OPA requirements.
 - MHBC comment: This policy should be modified to remove the reference to sections 6.2 and 6.3. We request that the natural environment policies specific to aggregate applications should be developed and included within section 7.12. This request is because mineral aggregate policies are subject to a separate natural heritage policy framework in provincial policy compared to other forms of development.
- Policy 7.12.5.1.b refers to Township requirements for an EIS.
 - **MHBC comment:** the reference to section 6.2 should be deleted and the natural heritage policies application to mineral aggregate applications should be included in section 7.12. (as mentioned above).
- Policy 7.12.5.1.c refers to requirements for consistency with the County and Township Official Plan.
 - **MHBC comment:** The policy should be revised to request "conformity" rather than be "consistent with".
- 7.12.5.e and 7.12.5.e.ii speaks to development agreements.
 - **The proposed policy states:** "e. Consideration of the use of the proposed operation compatible with existing and planned sensitive land uses in the area, the staging of extraction and rehabilitation within the proposed licenced area, the entering into a registered development agreement with the Township and such other relevant matters as the Township deems necessary such as: ii. if a public highway is to be used as a haul route, the appropriate road authority or authorities may require, in a suitable agreement, that any road improvements, the timing of road works, and the responsibilities for road maintenance during and after road construction are undertaken all at the expense of the operator of the pit or quarry;"
 - MHBC comment: The reference to a development agreement should be clarified to confirm that it is only required where works are required on County of Township land. The regulation of the site is to be in accordance with the requirements of the Aggregate Resources Act and the Municipal Act does not permit Municipalities to regulate mineral aggregate operations. Furthermore, reference to maintenance of the haul route in ii) should be removed since this is prohibited in accordance with the Section 12(1)(1.1) of the Aggregate Resources Act.

- Policy 7.12.5.1.f.vi speaks to off-site monitoring.
 - **MHBC comment:** this policy should be clarified that off-site monitoring is only applicable where it is deemed required and where the landowner provides access to complete the monitoring.
- Policy 7.12.6 speaks to Township monitoring of operations.
 - **MHBC comment:** Clarification should be provided to confirm that while the Township may monitor and provide comment, any determination of compliance in accordance with the Aggregate Resources Act is within the jurisdiction of the Ministry of Natural Resources.

We appreciate the opportunity to provide comment on the Draft Official Plan. Please do not hesitate to contact the undersigned should you have any questions or if there is any additional information that you require. We would be happy to meet with the Township to discuss our comments.

Yours truly,

MHBC

Rin Zorman

Brian Zeman, BES, MCIP, RPP Partner

cc. Mike MacMillan, Sarjeant James Newlands, MHBC



2297 Highway 12, PO Box 130 Brechin, Ontario L0K 1B0 p.705-484-5374 f. 705-484-0441

December 16, 2024

MHBC Planning, Urban Design & Landscape Architecture

Attn: Brian Zeman, BES, MCIP, RPP

RE: Township of Ramara Official Plan Update The Sarjeant Co Ltd.

The Township has reviewed your correspondence dated September 27, 2024, regarding the Township of Ramara Official Plan Update as it relates to Lots 9 & 10, Concession C, Rama, known municipally as 6059 Pearl Carrick Road on behalf of the Sarjeant Co Ltd. and provide the following responses:

Comments related to 6059 Pearl Carrick Road:

MHBC Comment:

Schedule A1 changes the designation of our site from Rural in the existing Official Plan to Greenlands in the Draft Official Plan

MHBC comment: We understand the revision was made to ensure conformity with the County Official Plan designations. We trust that the policies in the Township Draft Official Plan will conform with the policies in the County Official Plan whereby mineral aggregate operations may be permitted subject to a municipal Official Plan amendment.

Township Response:

The Greenlands designation is a conformity exercise with the County of Simcoe Official Plan; this property is currently designated Greenlands in the County Official Plan. Applications for Mineral Aggregate Extraction will be subject to the applicable natural heritage policies. In order to establish a mineral aggregate operation on site, a successful amendment to the Township of Ramara Official Plan would be required.

MHBC Comment:

Schedule A2 identifies wetlands throughout the site.

MHBC comment: Ecological fieldwork has been undertaken on this property to determine the extents of the on-site natural features. Once available, we would be

happy to provide the Township with a copy of the digital files of the mapped on-site natural features so that the Township's Official Plan schedules can be updated to accurately identify on-site wetlands.

Township Response:

The Township accepts digital files and technical supporting documentation to review natural heritage feature boundaries. These refinements can occur as part of an application under the Planning Act with the schedules being refined accordingly.

General Comments on the Township of Ramara Official Plan Update:

MHBC Comment:

Objective 3.9.4 speaks to the involvement and/or consultation of neighbouring municipalities regarding aggregate haul route agreements.

- **The proposed objective states**: "Neighbouring municipalities should be involved and/or consulted if aggregate haul route agreements are being established that would direct truck traffic to roads in those municipalities."
- **MHBC comment**: Reference to "aggregate haul route agreements" should be deleted. An aggregate haul route agreement should only be required when improvements to the entrance/exit or haul route are required to accommodate the proposed mineral aggregate operation.

Township Response:

Policy 3.9.4 has been updated to state "Neighbouring municipalities should be involved and/or consulted if aggregate haul routes are being established that would direct truck traffic to roads in those municipalities."

The purpose of this section is to note that for planning applications where haul routes are likely to impact adjoining municipalities that the adjacent municipality is circulated on the application.

MHBC Comment:

Policy 6.3.4.8 speaks to a Natural Area designation.

- **The proposed policy states**: "New or expanded mineral aggregate operations are prohibited in areas designated Natural Area, regardless if the lands are identified as HPMARAS on Schedule 'D'."
- **MHBC comment**: It appears that there is no "Natural Area Designation" in the Draft OP or the Schedules. Please clarify. Furthermore, the policy should be updated since natural areas are not an automatic prohibition for mineral aggregate operations. In accordance with Provincial Policy, mineral aggregate operations are only prohibited in Provincially Significant Wetlands and may be considered in other features subject to meeting certain criteria.

Township Response:

Natural Resources policies have been renumber from 6.3 to 6.5. This policy has been removed entirely.

MHBC Comment:

Policy 6.3.4.9 speaks to where extraction may occur.

MHBC comment: this policy should be modified since it is inconsistent with other provisions of the Official Plan which state an Official Plan amendment would be required if the site is not already designated "Mineral Resource Extraction Area". Furthermore, other policies state aggregate extraction is permitted to occur outside of the HPMARA identified on Schedule D, subject to an Official Plan amendment. A policy option could include stating that if the site is within the HPMARA, only a Municipal Zoning By-law Amendment would be required and if the site is outside of the HPMARA, both an Official Plan Amendment and Zoning By-law Amendment would be required.

Township Response:

This policy has been removed entirely.

MHBC Comment:

Policy 7.12.2 speaks to permitted uses in the Mineral Aggregate Extraction Area Designation.

- **MHBC comment**: Aggregate recycling should be permitted on-site without the need for a Zoning By-law Amendment.

Township Response:

Mineral Aggregate Extraction Policies have been renumbered from 7.12 to 7.13 Recycling is included in permitted uses in bullet 5.

MHBC Comment:

Policy 7.12.4.4 speaks to Municipal Site Plan Approval.

- **The proposed policy states**: "All new development in relation to mineral aggregate operations will be subject to Site Plan Approval."
- MHBC comment: Mineral Aggregate Operations are not subject to Municipal Site Plan Approval as they are subject to site plans issued under the ARA. This policy should be deleted or modified to clarify that the site plan approval is in accordance with the Aggregate Resources Act.

Townshin P

Township Response: This section has been removed entirely

MHBC Comment:

Policy 7.12.4.5 refers to Site Plan Amendments

- **The proposed policy states:** "Any application under provincial statute to change, vary or add to the conditions in an existing licence and/or site plan that

proposes to increase the tonnage limit of annual extraction and/or that proposes to extract aggregate below the groundwater table must comply with the Township's requirements according to Section 7.11.5 of this Plan, and in all applications, the Township shall send its comments and recommendations to the provincial agencies within the legislative comment periods."

- **MHBC comment**: Section 7.11.5 refers to Official Plan Amendments for lands designated "Highway Commercial." Furthermore, this policy should be deleted as site plan and licence amendments are to be completed in accordance with the requirements of the Aggregate Resources Act and are not subject to the provisions of the Municipal Official Plan unless a Zoning By-law Amendment is required to permit the use.

Township Response:

7.13.4.4 states "The Township shall send comments an recommendations to the provincial agencies within the legislative commenting period relating to any application under provincial statute to change, vary or add to the conditions in an existing licence and/or site plan that proposes to increase the tonnage limit of annual extraction and/or that proposes to extract aggregate below the groundwater table"

Improperly numbered sections have been updated in the final draft.

MHBC Comment:

Policy 7.12.4.7 speaks to OPA requirements.

 MHBC comment: This policy should be modified to remove the reference to sections 6.2 and 6.3. We request that the natural environment policies specific to aggregate applications should be developed and included within section 7.12. This request is because mineral aggregate policies are subject to a separate natural heritage policy framework in provincial policy compared to other forms of development.

Township Response:

This section has been removed entirely.

MHBC Comment:

Policy 7.12.5.1.b refers to Township requirements for an EIS.

- **MHBC comment**: the reference to section 6.2 should be deleted and the natural heritage policies application to mineral aggregate applications should be included in section 7.12. (As mentioned above).

Township Response:

7.1.5.1.b states "If required, the submission of an Environmental Impact Study according to Natural Heritage policies."

MHBC Comment:

Policy 7.12.5.1.c refers to requirements for consistency with the County and Township Official Plan.

- **MHBC comment**: The policy should be revised to request "conformity" rather than be "consistent with". 7.12.5.e and 7.12.5.e.ii speaks to development agreements.

Township Response:

7.13.5.c states: "Demonstration that the proposed mineral aggregate extraction and rehabilitation are in conformity with the policies of the County of Simcoe Official Plan and this Plan;"

MHBC Comment:

The proposed policy states: "e. Consideration of the use of the proposed operation compatible with existing and planned sensitive land uses in the area, the staging of extraction and rehabilitation within the proposed licenced area, the entering into a registered development agreement with the Township and such other relevant matters as the Township deems necessary such as: ii. if a public highway is to be used as a haul route, the appropriate road authority or authorities may require, in a suitable agreement, that any road improvements, the timing of road works, and the responsibilities for road maintenance during and after road construction are undertaken all at the expense of the operator of the pit or quarry;"

- **MHBC comment**: The reference to a development agreement should be clarified to confirm that it is only required where works are required on County of Township land. The regulation of the site is to be in accordance with the requirements of the Aggregate Resources Act and the Municipal Act does not permit Municipalities to regulate mineral aggregate operations. Furthermore, reference to maintenance of the haul route in ii) should be removed since this is prohibited in accordance with the Section 12(1)(1.1) of the Aggregate Resources Act.

Township Response:

7.13.5.e states: "Consideration of the use of the proposed operation compatible with existing and planned sensitive land uses in the area, the staging of extraction and rehabilitation within the proposed licenced area, the entering into a registered development agreement with the Township where works are required on County or Township land and such other relevant matters as the Township deems necessary such as...."

MHBC Comment:

Policy 7.12.5.1.f.vi speaks to off-site monitoring.

- **MHBC comment**: this policy should be clarified that off-site monitoring is only applicable where it is deemed required and where the landowner provides access to complete the monitoring.

Township Response:

7.13.5.1.f.vi states "That the operator agrees to ensure off-site monitoring of private water supplies to meet quality and quantity standards and requirements and that appropriate mitigation measures are included in agreements with landowners, where required"

MHBC Comment:

Policy 7.12.6 speaks to Township monitoring of operations.

- **MHBC comment**: Clarification should be provided to confirm that while the Township may monitor and provide comment, any determination of compliance in accordance with the Aggregate Resources Act is within the jurisdiction of the Ministry of Natural Resources

Township Response:

Section 7.13.6 advises that the Township may provide comments to the provincial ministry as the licences are issued by the Ministry of Natural Resources and Forestry under the Aggregate Resources Act. The inclusion of the above recommended statement within the Official Plan text is not necessary.

The Township appreciates the time spent reviewing the Draft Official Plan and comments provided. Should you require any further assistance or information, please contact the undersigned.

Respectfully submitted,

Jennifustong

Jennifer Stong, BA, CPT Planner Township of Ramara jstong@ramara.ca 705-484-5374 ext 251

Cc: Mayor and Council, Township of Ramara Jennifer Connor, Clerk, Township of Ramara



November 27, 2024

Jennifer Connor, Clerk **Township of Ramara** 2297 Hwy 12, PO Box 130 Brechin, ON LOK 1B0

Mayor and Council Township of Ramara 2297 Hwy 12, PO Box 130 Brechin, ON LOK 1B0

Dear Mayor, Council and Ms. Connor;

Township of Ramara Official Plan Updates – NRK Holdings Inc. RE: **OUR FILE 2411A**

On behalf of our Client, NRK Holdings Inc., MacNaughton Hermsen Britton Clarkson ('MHBC') is pleased to submit the comments regarding updates to the Township of Ramara Official Plan (Draft July 5, 2024). NRK Holdings Inc. owns lands located 7406 Concession Road B-C, 7556 Concession Road B-C, and 2381 Concession Road D-E. This letter is being submitted in accordance with Section 17 (24) of the Planning Act to provide comments on the draft new Official Plan.

Comments Specific to Our Site:

- Policy 7.12.10.4 speaks to the NRK special designation of the Mineral Aggregate Extraction Area designation.
 - **MHBC comment:** As referenced in the NRK special designation policies, Section 7.11.1 speaks to Purpose of the Highway Commercial designation. The reference to 7.11.1 in this section should be revised to refer to 7.12.1.
- Schedule A1 changes the designation of our site from Rural in the existing Official Plan to Greenlands in the Draft Official Plan
 - **MHBC comment:** We understand the revision was made to ensure conformity with the County Official Plan designations. We trust that the policies in the Township Draft Official Plan will conform with the policies in the County Official Plan whereby mineral aggregate operations may be permitted subject to a municipal Official Plan amendment.
- Schedule A1 references a special designation over the portion of the site designated Mineral Aggregate Resource Area stating, "See Section 7.4.10.4 and 7.11.12.4."
 - **MHBC comment:** The reference to the above noted sections should be updated to be 7.4.9.4 and 7.12.10.4. In Section 7.4.9.4, we ask that all references to other policy sections be updated as necessary.
- Schedule A2 identifies wetlands throughout the site.

💡 113 Collier Street, Barrie, ON | L4M 1H2

705-728-0045



 MHBC comment: Ecological fieldwork has been undertaken on this property to determine the extents of the on-site natural features. Once available, we would be happy to provide the Township with a copy of the digital files of the mapped on-site natural features so that the Township's Official Plan schedules can be updated to accurately identify on-site wetlands.

General Comments on Draft Official Plan:

- Objective 3.9.4 speaks to the involvement and/or consultation of neighbouring municipalities regarding aggregate haul route agreements.
 - **The proposed objective states:** "Neighbouring municipalities should be involved and/or consulted if aggregate haul route agreements are being established that would direct truck traffic to roads in those municipalities."
 - **MHBC comment:** Reference to "aggregate haul route agreements" should be deleted. An aggregate haul route agreement should only be required when improvements to the entrance/exit or haul route are required to accommodate the proposed mineral aggregate operation.
- Policy 6.2.4 speaks to Natural Heritage Features.
 - MHBC comment: The introductory text for Section 9.0 (Definitions) states that words that are italicized have been included in this Glossary. However, terms such as "Significant Wetlands", "Locally Significant Wetlands", and "Significant Woodlands" are italicized in Section 6.2.4, but do not have an associated definition in Section 9.0.
- Policy 6.3.4.8 speaks to a Natural Area designation.
 - **The proposed policy states:** "New or expanded mineral aggregate operations are prohibited in areas designated Natural Area, regardless if the lands are identified as HPMARAS on Schedule 'D'."
 - MHBC comment: It appears that there is no "Natural Area Designation" in the Draft OP or the Schedules. Please clarify. Furthermore, the policy should be updated since natural areas are not an automatic prohibition for mineral aggregate operations. In accordance with Provincial Policy, mineral aggregate operations are only prohibited in Provincially Significant Wetlands and may be considered in other features subject to meeting certain criteria.
- Policy 6.3.4.9 speaks to where extraction may occur.
 - MHBC comment: this policy should be modified since it is inconsistent with other provisions of the Official Plan which state an Official Plan amendment would be required if the site is not already designated "Mineral Resource Extraction Area". Furthermore, other policies state aggregate extraction is permitted to occur outside of the HPMARA identified on Schedule D, subject to an Official Plan amendment.

A policy option could include stating that if the site is within the HPMARA, only a Municipal Zoning By-law Amendment would be required and if the site is outside of the HPMARA, both an Official Plan Amendment and Zoning By-law Amendment would be required.

- Policy 7.12.2 speaks to permitted uses in the Mineral Aggregate Extraction Area Designation.
 - **MHBC comment:** Aggregate recycling should be permitted on-site without the need for a Zoning By-law Amendment.
- Policy 7.12.4.4 speaks to Municipal Site Plan Approval.
 - **The proposed policy states:** "All new development in relation to mineral aggregate operations will be subject to Site Plan Approval."
 - **MHBC comment:** Mineral Aggregate Operations are not subject to Municipal Site Plan Approval as they are subject to site plans issued under the ARA. This policy should be deleted or modified to clarify that the site plan approval is in accordance with the Aggregate Resources Act.
- Policy 7.12.4.5 refers to Site Plan Amendments
 - **The proposed policy states:** "Any application under provincial statute to change, vary or add to the conditions in an existing licence and/or site plan that proposes to increase the tonnage limit of annual extraction and/or that proposes to extract aggregate below the groundwater table must comply with the Township's requirements according to Section 7.11.5 of this Plan, and in all applications, the Township shall send its comments and recommendations to the provincial agencies within the legislative comment periods."
 - MHBC comment: Section 7.11.5 refers to Official Plan Amendments for lands designated "Highway Commercial." Furthermore, this policy should be deleted as site plan and licence amendments are to be completed in accordance with the requirements of the Aggregate Resources Act and are not subject to the provisions of the Municipal Official Plan unless a Zoning By-law Amendment is required to permit the use.
- Policy 7.12.4.7 speaks to OPA requirements.
 - **MHBC comment:** This policy should be modified to remove the reference to sections 6.2 and 6.3. We request that the natural environment policies specific to aggregate applications should be developed and included within section 7.12. This request is because mineral aggregate policies are subject to a separate natural heritage policy framework in provincial policy compared to other forms of development.
- Policy 7.12.5.1.b refers to Township requirements for an EIS.
 - **MHBC comment:** the reference to section 6.2 should be deleted and the natural heritage policies application to mineral aggregate applications should be included in section 7.12. (as mentioned above).
- Policy 7.12.5.1.c refers to requirements for consistency with the County and Township Official Plan.
 - **MHBC comment:** The policy should be revised to request "conformity" rather than be "consistent with".
- 7.12.5.e and 7.12.5.e.ii speaks to development agreements.

- **The proposed policy states:** "e. Consideration of the use of the proposed operation compatible with existing and planned sensitive land uses in the area, the staging of extraction and rehabilitation within the proposed licenced area, the entering into a registered development agreement with the Township and such other relevant matters as the Township deems necessary such as: ii. if a public highway is to be used as a haul route, the appropriate road authority or authorities may require, in a suitable agreement, that any road improvements, the timing of road works, and the responsibilities for road maintenance during and after road construction are undertaken all at the expense of the operator of the pit or quarry;"
- MHBC comment: The reference to a development agreement should be clarified to confirm that it is only required where works are required on County of Township land. The regulation of the site is to be in accordance with the requirements of the Aggregate Resources Act and the Municipal Act does not permit Municipalities to regulate mineral aggregate operations. Furthermore, reference to maintenance of the haul route in ii) should be removed since this is prohibited in accordance with the Section 12(1)(1.1) of the Aggregate Resources Act.
- Policy 7.12.5.1.f.vi speaks to off-site monitoring.
 - **MHBC comment:** this policy should be clarified that off-site monitoring is only applicable where it is deemed required and where the landowner provides access to complete the monitoring.
- Policy 7.12.6 speaks to Township monitoring of operations.
 - **MHBC comment:** Clarification should be provided to confirm that while the Township may monitor and provide comment, any determination of compliance in accordance with the Aggregate Resources Act is within the jurisdiction of the Ministry of Natural Resources.

We appreciate the opportunity to provide comment on the Draft Official Plan. Please do not hesitate to contact the undersigned should you have any questions or if there is any additional information that you require. We would be happy to meet with the Township to discuss our comments.

Yours truly,

MHBC

R. Zorman

Brian Zeman, BES, MCIP, RPP Partner

cc. Matthew Cinelli, NRK Holdings Inc. James Newlands, MHBC



2297 Highway 12, PO Box 130 Brechin, Ontario L0K 1B0 p.705-484-5374 f. 705-484-0441

December 16, 2024

MHBC Planning, Urban Design & Landscape Architecture

Attn: Brian Zeman, BES, MCIP, RPP

RE: Township of Ramara Official Plan Update NRK Holdings Inc.

The Township has reviewed your correspondence dated November 27, 2024 regarding the Township of Ramara Official Plan Update on behalf of NRK Holdings Inc. and provide the following responses:

MHBC Comment:

Policy 7.12.10.4 speaks to the NRK special designation of the Mineral Aggregate Extraction Area designation. **MHBC comment:** As referenced in the NRK special designation policies, Section 7.11.1 speaks to Purpose of the Highway Commercial designation. The reference to 7.11.1 in this section should be revised to refer to 7.12.1.

Township Response:

Due to changes in the structure of the draft Official Plan, the special designation policy for NRK can now be located at Section 7.13.10.4

MHBC Comment:

Schedule A1 changes the designation of our site from Rural in the existing Official Plan to Greenlands in the Draft Official Plan

MHBC comment: We understand the revision was made to ensure conformity with the County Official Plan designations. We trust that the policies in the Township Draft Official Plan will conform with the policies in the County Official Plan whereby mineral aggregate operations may be permitted subject to a municipal Official Plan amendment.

Township Response:

The Greenlands designation is a conformity exercise with the County of Simcoe Official Plan; this property is currently designated Greenlands in the County Official Plan. Applications for Mineral Aggregate Extraction will be subject to the applicable natural heritage policies. In order to establish a mineral aggregate operation on site, a successful amendment to the Township of Ramara Official Plan would be required.

MHBC Comment:

Schedule A1 references a special designation over the portion of the site designated Mineral Aggregate Resource Area stating, "See Section 7.4.10.4 and 7.11.12.4." **MHBC comment:** The reference to the above noted sections should be updated to be 7.4.9.4 and 7.12.10.4. In Section 7.4.9.4, we ask that all references to other policy sections be updated as necessary.

Township Response:

Due to changes in the structure of the draft Official Plan, the special designation policies have been updated. This is reflective on Schedules A1.

MHBC Comment:

Schedule A2 identifies wetlands throughout the site. **MHBC comment:** Ecological fieldwork has been undertaken on this property to determine the extents of the on-site natural features. Once available, we would be happy to provide the Township with a copy of the digital files of the mapped on-site natural features so that the Township's Official Plan schedules can be updated to accurately identify on-site wetlands.

Township Response:

The Township accepts digital files and technical supporting documentation to review natural heritage feature boundaries. These refinements can occur as part of an application under the Planning Act with the schedules being refined accordingly.

MHBC Comment:

Objective 3.9.4 speaks to the involvement and/or consultation of neighbouring municipalities regarding aggregate haul route agreements.

- **The proposed objective states**: "Neighbouring municipalities should be involved and/or consulted if aggregate haul route agreements are being established that would direct truck traffic to roads in those municipalities."
- **MHBC comment**: Reference to "aggregate haul route agreements" should be deleted. An aggregate haul route agreement should only be required when improvements to the entrance/exit or haul route are required to accommodate the proposed mineral aggregate operation.

Township Response:

Policy 3.9.4 has been updated to state "Neighbouring municipalities should be involved and/or consulted if aggregate haul routes are being established that would direct truck traffic to roads in those municipalities."

The purpose of this section is to note that for planning applications where haul routes are likely to impact adjoining municipalities that the adjacent municipality is circulated on the application.

MHBC Comment

Policy 6.2.4 speaks to Natural Heritage Features. **MHBC comment:** The introductory text for Section 9.0 (Definitions) states that words that are italicized have been included in this Glossary. However, terms such as "Significant Wetlands", "Locally Significant Wetlands", and "Significant Woodlands" are italicized in Section 6.2.4, but do not have an associated definition in Section 9.0.

Township Response:

Italicized terms have been updated as necessary.

MHBC Comment:

Policy 6.3.4.8 speaks to a Natural Area designation.

- **The proposed policy states**: "New or expanded mineral aggregate operations are prohibited in areas designated Natural Area, regardless if the lands are identified as HPMARAS on Schedule 'D'."
- **MHBC comment**: It appears that there is no "Natural Area Designation" in the Draft OP or the Schedules. Please clarify. Furthermore, the policy should be updated since natural areas are not an automatic prohibition for mineral aggregate operations. In accordance with Provincial Policy, mineral aggregate operations are only prohibited in Provincially Significant Wetlands and may be considered in other features subject to meeting certain criteria.

Township Response:

Natural Resources policies have been renumber from 6.3 to 6.5. This policy has been removed entirely.

MHBC Comment:

Policy 6.3.4.9 speaks to where extraction may occur.

MHBC comment: this policy should be modified since it is inconsistent with other provisions of the Official Plan which state an Official Plan amendment would be required if the site is not already designated "Mineral Resource Extraction Area". Furthermore, other policies state aggregate extraction is permitted to occur outside of the HPMARA identified on Schedule D, subject to an Official Plan amendment. A policy option could include stating that if the site is within the HPMARA, only a Municipal Zoning By-law Amendment would be required and if the site is outside of the HPMARA, both an Official Plan Amendment and Zoning By-law Amendment would be required.

Township Response:

This policy has been removed entirely.

MHBC Comment:

Policy 7.12.2 speaks to permitted uses in the Mineral Aggregate Extraction Area Designation.

- **MHBC comment**: Aggregate recycling should be permitted on-site without the need for a Zoning By-law Amendment.

Township Response:

Mineral Aggregate Extraction Policies have been renumbered from 7.12 to 7.13 Recycling is included in permitted uses in bullet 5.

MHBC Comment:

Policy 7.12.4.4 speaks to Municipal Site Plan Approval.

- **The proposed policy states**: "All new development in relation to mineral aggregate operations will be subject to Site Plan Approval."
- **MHBC comment**: Mineral Aggregate Operations are not subject to Municipal Site Plan Approval as they are subject to site plans issued under the ARA. This policy should be deleted or modified to clarify that the site plan approval is in accordance with the Aggregate Resources Act.

Township Response:

This section has been removed entirely

MHBC Comment:

Policy 7.12.4.5 refers to Site Plan Amendments

- **The proposed policy states:** "Any application under provincial statute to change, vary or add to the conditions in an existing licence and/or site plan that proposes to increase the tonnage limit of annual extraction and/or that proposes to extract aggregate below the groundwater table must comply with the Township's requirements according to Section 7.11.5 of this Plan, and in all applications, the Township shall send its comments and recommendations to the provincial agencies within the legislative comment periods."
- **MHBC comment**: Section 7.11.5 refers to Official Plan Amendments for lands designated "Highway Commercial." Furthermore, this policy should be deleted as site plan and licence amendments are to be completed in accordance with the requirements of the Aggregate Resources Act and are not subject to the provisions of the Municipal Official Plan unless a Zoning By-law Amendment is required to permit the use.

Township Response:

7.13.4.4 states "The Township shall send comments and recommendations to the provincial agencies within the legislative commenting period relating to any application under provincial statute to change, vary or add to the conditions in an existing licence and/or site plan that proposes to increase the tonnage limit of annual extraction and/or that proposes to extract aggregate below the groundwater table"

Improperly numbered sections have been updated in the final draft.

MHBC Comment:

Policy 7.12.4.7 speaks to OPA requirements.

 MHBC comment: This policy should be modified to remove the reference to sections 6.2 and 6.3. We request that the natural environment policies specific to aggregate applications should be developed and included within section 7.12. This request is because mineral aggregate policies are subject to a separate natural heritage policy framework in provincial policy compared to other forms of development.

Township Response:

This section has been removed entirely

MHBC Comment:

Policy 7.12.5.1.b refers to Township requirements for an EIS.

- **MHBC comment**: the reference to section 6.2 should be deleted and the natural heritage policies application to mineral aggregate applications should be included in section 7.12. (as mentioned above).

Township Response:

7.1.5.1.b states "If required, the submission of an Environmental Impact Study according to Natural Heritage policies."

MHBC Comment:

Policy 7.12.5.1.c refers to requirements for consistency with the County and Township Official Plan.

- **MHBC comment**: The policy should be revised to request "conformity" rather than be "consistent with". 7.12.5.e and 7.12.5.e.ii speaks to development agreements.

Township Response:

7.13.5.c states: "Demonstration that the proposed mineral aggregate extraction and rehabilitation are in conformity with the policies of the County of Simcoe Official Plan and this Plan;"

MHBC Comment:

7.12.5.e and 7.12.5.e.ii speaks to development agreements.

The proposed policy states: "e. Consideration of the use of the proposed operation compatible with existing and planned sensitive land uses in the area, the staging of extraction and rehabilitation within the proposed licenced area, the entering into a registered development agreement with the Township and such other relevant matters as the Township deems necessary such as: ii. if a public highway is to be used as a haul route, the appropriate road authority or authorities may require, in a suitable agreement, that any road improvements, the timing of road works, and the

responsibilities for road maintenance during and after road construction are undertaken all at the expense of the operator of the pit or quarry;"

MHBC comment: The reference to a development agreement should be clarified to confirm that it is only required where works are required on County of Township land. The regulation of the site is to be in accordance with the requirements of the Aggregate Resources Act and the Municipal Act does not permit Municipalities to regulate mineral aggregate operations. Furthermore, reference to maintenance of the haul route in ii) should be removed since this is prohibited in accordance with the Section 12(1)(1.1) of the Aggregate Resources Act.

Township Response:

7.13.5.e states: "Consideration of the use of the proposed operation compatible with existing and planned sensitive land uses in the area, the staging of extraction and rehabilitation within the proposed licenced area, the entering into a registered development agreement with the Township where works are required on County or Township land and such other relevant matters as the Township deems necessary such as...."

MHBC Comment:

Policy 7.12.5.1.f.vi speaks to off-site monitoring.

MHBC comment: this policy should be clarified that off-site monitoring is only applicable where it is deemed required and where the landowner provides access to complete the monitoring.

Township Response:

7.13.5.1.f.vi states "That the operator agrees to ensure off-site monitoring of private water supplies to meet quality and quantity standards and requirements and that appropriate mitigation measures are included in agreements with landowners, where required"

MHBC Comment:

Policy 7.12.6 speaks to Township monitoring of operations.

MHBC comment: Clarification should be provided to confirm that while the Township may monitor and provide comment, any determination of compliance in accordance with the Aggregate Resources Act is within the jurisdiction of the Ministry of Natural Resources

Township Response:

Section 7.13.6 advises that the Township may provide comments to the provincial ministry as the licences are issued by the Ministry of Natural Resources and Forestry under the Aggregate Resources Act. The inclusion of the above recommended statement within the Official Plan text is not necessary.

The Township appreciates the time spent reviewing the Draft Official Plan and comments provided. Should you require any further assistance or information, please contact the undersigned.

Respectfully submitted,

Jennifer Stong, BA, CPT Planner Township of Ramara jstong@ramara.ca 705-484-5374 ext 251

Cc: Mayor and Council, Township of Ramara Jennifer Connor, Clerk, Township of Ramara Walied Zekry, Director of Building & Planning/CBO, Township of Ramara



January 21, 2025

Karissa Barker Planning Technician/Secretary-Treasurer, Committee of Adjustment Township of Ramara 2297 Highway 12, PO Box 130 Brechin, ON L0K 1B0 VIA EMAIL kbarker@ramara.ca

OFFICIAL PLAN UPDATE FINAL DRAFT TOWNSHIP OF RAMARA

Thank you for the opportunity to review a copy of the final draft of the new Official Plan for the Township of Ramara as well as the response to the Simcoe County District School Board (SCDSB) comments provided in July 2024. It is understood that Schedules and Maps for the final draft are currently being finalized and are anticipated to be available in January 2025. SCDSB planning staff are appreciative of the efforts made thus far to review and address the board's comments. SCDSB planning staff wish to take this opportunity to provide comments on the final draft Official Plan dated December 16, 2024 and the final draft Maps and Schedules dated January 15, 2025.

The Simcoe County District School Board is generally satisfied that the draft Official Plan permits the board to designate new school sites as required and is pleased with the inclusion of various policies supporting active transportation, partnerships, and schools as public service facilities permitted in all designations. However, there are a couple of new and outstanding comments previously provided by SCDSB planning staff that merit additional consideration.

Section 5.0 – Public and Private Infrastructure

SCDSB planning staff had previously highlighted how two existing public elementary schools within the Township of Ramara, Rama Central Public School and Uptergrove Public School, are currently serviced with private water and wastewater systems. When a school is privately serviced, its capacity is limited by the Ministry of Environment's Reasonable Land Use Policy, which limits the school's ability to provide appropriate school accommodation. The board makes every effort to have existing schools serviced with communal or municipal water and wastewater services when they become available, which includes providing appropriate financial contributions for the necessary connections. SCDSB planning staff recognize that amendments to the draft Official Plan were made based on previous SCDSB comments; namely, that a new clause was included as 5.1 13, "The connection of any existing privately serviced public schools to proposed new municipal or communal water, or wastewater systems is encouraged." However, the board respectfully requests that stronger language be used to require connecting existing public schools to new communal or municipal water or wastewater services by replacing "is encouraged" with "is required, as necessary" in policy 5.1 13.

The *Provincial Planning Statement, 2024* (PPS), which came into effect on October 20, 2024, emphasizes the importance of public service facilities such as schools by including various policies that describe public service facilities as helping achieve complete communities. Municipalities are legislated to ensure that public service facilities are available to meet current and projected needs and must appropriately identify locations and promote opportunities for locating public service facilities. The PPS provides policies that encourage public service facilities to be provided in an efficient manner while accommodating projected needs, which includes optimizing the use of existing public service facilities before developing new ones in policy 3.1.2.b). The requested modification would support the board in making more efficient use of existing schools, as public service facilities, in accordance with the PPS.

Section 6.1.14 – Principal Main Line Railway Noise, Vibration and Safety

Section 6.1.14 of the draft Official Plan proposes multiple policies related to proposed development in proximity to the principle main line railway right-of-way. Policy 6.1.14.3.i) specifically notes that "All proposed residential *developments* or other sensitive uses located in proximity to *rail facilities* shall evaluate, prioritize and secure grade separation of railways and major roads..." The SCDSB currently operates Brechin Public School at 3226 Ramara Road 47. The school is located adjacent to the principle main line railway right-of-way and the at-grade-crossing of Ramara Road 47. As schools are considered sensitive land uses, SCDSB planning staff are concerned that policy 6.1.14.3.i) as it currently reads would require the board to investigate and potentially develop a grade separated crossing where Ramara Road 47 crosses the railway mainline, if the board were to propose additional school development at 3226 Ramara Road. Thus, SCDSB planning staff respectfully request that policy 6.1.14.2.i) be revised by inserting the word "new", as follows:

All new proposed residential developments or other sensitive uses located in proximity to *rail facilities* shall evaluate, prioritize and secure grade separation of railways and major roads, in co-operation with Transport Canada and the appropriate railway operator;

The proposed revised policy would create flexibility for additions and minor development projects that would not justify the upgrading of an at-grade crossing, while still ensuring that new development adequately consider the suitability of existing rail crossings.

SCDSB planning staff also respectfully request confirmation be provided that policy 6.1.14.2.i) does not apply to the placement of portable classrooms on existing school sites.

Section 7.6 – Atherley-Uptergrove Secondary Plan

The SCDSB previously noted a couple of concerns with policies that would impact the provision of school sites within the Atherley-Uptergrove Secondary Plan area. SCDSB planning staff requested including schools, as public service facilities, as a permitted use in the Village Residential Areas and that flexibility be added to policy 7.6.5.4 to ensure schools can be located outside of the Village Institutional Area as needed. The draft Official Plan dated December 16, 2024 does not permit schools within Section 7.6.3 Village Residential Areas, and schools are only permitted to be located outside the Village Institutional Area as per policy 7.6.5.4.

In principle, the board is not opposed to locating a future required public school within the Village Institutional Area. However, the board is concerned that the Village Institutional Area will not be developed as a neighbourhood, meaning a future public school would be isolated from the residential student population it is designed to serve. The SCDSB constructs neighbourhood schools; if the area is not intended to become a neighbourhood, the SCDSB would not be able to support locating a new public school here. SCDSB planning staff also note that as the Secondary Plan area develops, densities and residential typologies may change. Should those changes lead to requiring additional public schools to serve the development, the board would not be able to support multiple public elementary schools within this limited area.

The current Village Institutional Area, as shown in the current Schedule B1, has limited pedestrian connectivity to existing and future residential areas within the Secondary Plan and is largely bordered by Village Commercial lands. This is exacerbated by Highway 12 bisecting the Village Institutional Area. Current best practices and board policy for locating school sites and developing attendance areas for those schools include locating schools within or adjacent to residential areas that generate students, encouraging the use of active transportation to access schools, and creating efficiencies in walk zones. These practices reduce school busing costs that must be borne by taxpayers, reduce traffic congestion and safety impacts on the surrounding road network, and increase opportunities for physical and mental wellbeing that come with using active transportation to get to and from school.

The PPS includes various policies for public service facilities to ensure that public services are provided in an efficient manner that accommodates projected needs. Policy 1.b) specifically states that planning for public service facilities should be coordinated and integrated to "leverage the capacity of development proponents, where appropriate." The board often works with residential developers to develop needed school sites, because the residential units generate the students that require school accommodation. This synergy creates economies of scale in regards to servicing and other needed requirements for new school sites. Policy 3.1.4 of the PPS states that public service facilities should be planned and co-located with one another, along with parks and open space, in order to promote cost-effectiveness, facilitate service integration, access to transit, and active transportation. The draft Official Plan also includes policies that encourage this co-location of facilities. However, limiting schools to the Village Institutional Area means that new residential developments in the Village Residential Area that include parks and open space cannot even be considered for co-location of new schools.

SCDSB planning staff respectfully request that policy 7.6.5.4 in the draft Official Plan be amended as follows:

Any school site required by any school board should be located within this area and the size and configuration of the site shall meet the standards of the school board and shall be supported by planning studies in a planning application, except where locational factors or school board needs dictate that a school site be located within the Village Residential Area.

This amended policy will ensure that required school sites can be located within or adjacent to the residential areas where students live, aligns with the *Provincial Planning Statement, 2024,* supports the draft Official Plan policies regarding co-location of public service facilities, and provides the board with flexibility to adapt to changing development patterns to ensure public school accommodation can be provided in a timely manner when and where it is needed.

Conclusion

The Simcoe County District School Board is appreciative of the work done thus far to review and address the board's comments on the draft Official Plan. The few remaining policies of concern will, however, inhibit the board in providing appropriate public school accommodation where and when it is needed. The proposed revised language will provide greater flexibility for the provision of public service facilities like public schools and streamline the planning approval process to ensure public schools accommodation can be provided in a timely manner.

The SCDSB would be pleased to discuss the draft Official Plan as it relates to future school site needs with Township of Ramara planning staff, as required. Should you require additional information, please do not hesitate to contact this office.

Sincerely,

Kristen Bartmann, MPLAN Planner, Planning & Enrolment

cc: Township of Ramara Walied Zekry, Director of Building and Planning/Chief Building Official Tayha Graham, Planning Administrative Assistant

Simcoe County District School Board Andrew Keuken, Manager of Planning, Enrolment and Community Use Sandy Clee, Assistant Manager of Accomodation & Planning Katie Kirton, Assistant Manager of Planning & Property



2297 Highway 12, PO Box 130 Brechin, Ontario L0K 1B0 p.705-484-5374 f. 705-484-0441

February 14, 2025

Kristen Bartmann, Planning & Enrollment Department Simcoe County District School Board



VIA EMAIL RE: Response to Simcoe County District School Board Ramara Draft OP Comments

Thank you for your time taken to review and provide further comment on January 21, 2025 in regards to the proposed Township of Ramara Official Plan.

Please be advised that we have considered all of your comments and revisions presented. Please find below our responses:

Section 5.0 – Public and Private Infrastructure

In order to enhance clarity, the language under Section 5.1.13 of the proposed Official Plan (OP) has been updated to the following:

"The connection of any existing privately serviced public schools to proposed new municipal or communal water, or wastewater systems is required as necessary."

Section 6.1.14 – Principal Main Line Railway Noise, Vibration and Safety

Section 6.1.14 of the proposed OP is written in accordance with Sections 3.4 and 3.5 of the Provincial Planning Statement 2024 (PPS 2024) and Ontario Regulation 254/23. Section 6.1.14 policy is written particularly to residential development and other sensitive land uses.

The term "where appropriate" is included, as the triggering of the study is contingent on the use proposed and specifics of the project of which may not require such assessments.

The placement of a portable classroom on a school site of a district school board if the school site was in existence on January 1, 2007 is not considered "development" under Section 41 of the Planning Act, and therefore would not trigger a review of the Official Plan upon building permit so long as the provisions of the Zoning By-law are met.

Section 7.6 – Atherley-Uptergrove Secondary Plan

Section 7.6.3 of the proposed OP speaks directly to the objectives of the Village Residential Areas and is not inclusive of language that would limit or restrict a district school board from establishing a new school site location within a Village Residential Area.



We outline that the permitted uses under Section 7.5.2 of the proposed OP are specific to uses that the Township of Ramara has planned for the different categories of Village Settlement designated areas.

We have further revised Section 7.6.5.4. of the proposed OP to state:

"Any school site required by any district school board should be located within this area and the size and configuration of the site shall meet the standards of the school board and shall be supported by planning studies in a planning application, except where locational factors or district school board needs dictate that a school site be located within the Village Residential Area, where appropriate."

Based on the text of these Sections accumulatively (7.5.2., 7.6.3, and 7.6.5.4.), a school board is not prevented from establishing a school within a Village Residential Area.

We appreciate the comment regarding the location of the Village Institutional Area and the surrounding land uses. Based on this review, the property to the west of the Village Institutional Area will be adjusted to "Future Growth Area" to ensure any development on the parcel is reviewed holistically.

Conclusion

We trust that the above noted revisions and/or clarification to the proposed plan will provide better flexibility for the provision of public service facilities, inclusive of schools to ensure that future development is appropriate and that processes are streamlined and efficient.

Please contact the undersigned if you require anything further.

Respectfully submitted,

Karissa Barker Planning Technician/Secretary-Treasurer, Committee of Adjustment Township of Ramara <u>kbarker@ramara.ca</u> 705-484-5374 x 222

Cc: Mayor and Council, Township of Ramara

Jennifer Connor, Clerk, Township of Ramara



March 14, 2025

Karissa Barker Planning Technician/Secretary-Treasurer, Committee of Adjustment Township of Ramara 2297 Highway 12, PO Box 130 Brechin, ON L0K 1B0 VIA EMAIL kbarker@ramara.ca

OFFICIAL PLAN UPDATE FINAL DRAFT – FEB 14, 2025 TOWNSHIP RESPONSE TOWNSHIP OF RAMARA

Simcoe County District School Board (SCDSB) planning staff are in receipt of the Township of Ramara response letter dated February 14, 2025 that includes comments and revisions in response to the SCDSB's most recently submitted comments (provided January 21, 2025) in regards to the proposed Township of Ramara Official Plan.

SCDSB planning staff are extremely appreciative of Township staff's efforts to receive, review, and address all of the board's comments on the draft Official Plan over the last year or so. The SCDSB is satisfied with the rationale and revisions outlined in the February 14, 2025 Township letter. The SCDSB is of the opinion that the overall draft Official Plan permits the board to designate new school sites as required while including supportive policies that enable the board to provide appropriate public school accommodation where and when it is needed.

Thus, the SCDSB has no further comments on the draft Official Plan at this time. Planning staff understand that a staff report and recommendation will be provided to Council at the upcoming 2025 Committee of the Whole meeting anticipated for April 2025 and look forward to the review of those materials.

Should you require additional information, please do not hesitate to contact this office.

Sincerely,

Kristen Bartmann, MPLAN Planner, Planning & Enrolment

cc: Township of Ramara Walied Zekry, Director of Building and Planning/Chief Building Official Jennifer Connor, Clerk Jennifer Stong, Planner Tayha Graham, Planning Administrative Assistant Simcoe County District School Board Andrew Keuken, Manager of Planning, Enrolment and Community Use Sandy Clee, Assistant Manager of Accomodation & Planning Katie Kirton, Assistant Manager of Planning & Property Confidentiality Note: This email message and any attachments are intended only for the named recipient(s) above and may contain privileged, confidential and/or exempt from disclosure under the Municipal Freedom of Information and Protection of Privacy Act. If you have received this message in error, please notify the sender immediately and delete this email message from your computer. Thank you.

From: Krsul, Tim (MECP) Sent: January 23, 2025 11:53 AM To: Tahya Graham <tgraham@ramara.ca>;

Cc: Jennifer Stong <JStong@ramara.ca>; Karissa Barker <KBarker@ramara.ca>; Walied Zekry <WZekry@ramara.ca>

Subject: FW: Ramara Draft Official Plan Update

Some people who received this message don't often get email from tim.krsul@ontario.ca. Learn why this is important

Good morning Tanya

I am responding to your email to Brad Allen of the Ministry Barrie District Office advising the final draft of the Township of Ramara Official Plan Schedules are now published on the website via <u>https://www.ramara.ca/en/municipal-office/official-plan-review.aspx</u>

Thank you for providing a copy of the documents. I have reviewed the draft Official Plan and have confirmed that portions of the Township of Ramara are located within the Lake Simcoe Watershed. The *Lake Simcoe Protection Act* and *Planning Act* require that decisions; such as Official Plan amendments, conform with the Lake Simcoe Protection Plan (LSPP) designated policies and have regard policies.

Through my review of Official Plan Policy 7.6.1.2 I made note of a general policy requiring conformity with the LSPP. Further I found references to other general policy requirements for stormwater management and subsurface sewage works requirements that link to LSPP designated policies.

My only concern was the OP communal and municipal wastewater treatment (e.g., section 7.11.8 Infrastructure or 8.11 Servicing Feasibility Study) policies do not appear to conform with prohibitions in LSPP Policy 4.1, 4.3 and 4.4. For greater certainty any *Planning Act* application involving a new wastewater treatment facility must conform to LSPP designated policies. MECP has through MMAH requested municipalities in the Lake Simcoe watershed to include OP policies that prohibit new sewage treatment plants that discharge treated sewage containing phosphorus into

surface water in the Lake Simcoe watershed.

I am available to discuss my comments at your convenience should you have an interest.

Thank you again for sharing the documents and considering our comments on the draft Official Plan.

Sincerely

Tim Krsul Barrie District Office Ministry of the Environment, Conservation and Parks

24/7 Spills Action Centre: (800) 268-6060 24/7 Pollution Hotline: (866) 663-8477 · <u>moe.tips.moe@ontario.ca</u>

If you have any accommodation needs or require communication supports or alternate formats, please let me know.

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CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good Afternoon,

Please be advised that the final draft of the Township of Ramara Official Plan **Schedules** are now published on the website.

Click the link below to review the schedules and text: <u>https://www.ramara.ca/en/municipal-office/official-plan-review.aspx</u>

You are receiving this email because you either submitted comments or asked to be kept informed on the status of the project.

Thank you,

Tahya Graham, BA

From:	
То:	Jennifer Stong; Tahya Graham;
Cc:	Karissa Barker; Walied Zekry
Subject:	RE: Ramara Draft Official Plan Update
Date:	February 6, 2025 11:21:09 AM
Attachments:	

Some people who received this message don't often get email from tim.krsul@ontario.ca. Learn why this is important

Good Morning Jennifer,

Thank you for considering our comments on the draft Official Plan and sharing the emailed the proposed additions below.

I have reviewed your proposed OP policy statements in your email dated January 31, 2025. I believe the changes being proposed in OP policies 7.1.1.8 and 8.1, better conform with the LSPP sewage works policies and address our comments.

OP Section 5 as written below including the text "**met the provisions**" also tracks LSPP 4.15 designated policies.

Thank you for circling back with us. I am available at your convenience should something come up regarding our comments or the changes you are proposing below.

Sincerely

Tim Krsul Barrie District Office Ministry of the Environment, Conservation and Parks



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From:	Jennifer Stong
То:	Tahya Graham;
Cc:	Karissa Barker, Walied Zekry
Subject:	Re: Ramara Draft Official Plan Update
Date:	January 31, 2025 11:49:33 AM
Attachments:	

Hi Tim,

Thank you for your email, we are happy to receive your comments on our draft Official Plan. I have reviewed the submission below and the sections of the Draft OP. I intend to add the following for your review:

7.11.8 Infrastructure:

(adding the following text)

7. An environmental assessment shall be completed or approved prior to Planning Act or Condominium Act approvals for any development involving the establishment of a new sewage treatment plant, or an increase in the existing rated capacity of a sewage treatment plant within the Lake Simcoe watershed

8. No new municipal sewage treatment plant shall be established in the Lake Simcoe watershed unless:

- a. The new plant is intended to replace an existing municipal sewage treatment plant; or
- b. The new sewage treatment plan will provide sewage services to:
 - i. A development that is on partial services, or
 - ii. A development where one or more subsurface sewage works or on-site sewage systems are failing

9. No new non-municipal sewage treatment plans shall be established within the Lake Simcoe watershed unless the person applying to establish the plant can demonstrate the following:

- a. The plant will result in a net reduction of phosphorous loadings to the watershed from the baseline conditions for the property that would be serviced by the new plant; or
- b. The undertaking that the plan will service will not add phosphorous loadings to the Lake Simcoe watershed.

8.11 Servicing Feasibility Study (additional text highlighted)

- 1. The Servicing Feasibility Study shall investigate and determine the appropriate methods of *water supply* and *wastewater treatment* necessary to service proposed and existing *development* and to maintain ground and surface water resource quality and quantity. All reasonable servicing alternatives, preferably full municipal or private *communal services*, shall be considered within the context of a settlement servicing strategy that establishes servicing alternatives for *development* scenarios.
- 2. The study shall provide that for any proposed *development* the following issues shall be addressed by a proponent:
 - a. the potential to connect to existing and proposed *water supply* and *wastewater treatment* systems as well as existing capacity and feasibility of the extension and expansion, if required, the necessity for and feasibility of new facilities, and the analysis of comparative performance of similar facilities;
 - b. environmental, financial and administrative implications of multiple systems regardless of whether the systems discharge to surface water or *groundwater*;
 - c. where individual on-site *wastewater treatment* services are proposed, the suitability of the site shall be investigated, and environmental constraints evaluated. This includes the suitability of terrain, hydrological suitability, soils suitability and where subsurface disposal is proposed, hydrogeological suitability; and
 - d. consideration of the assimilative (carrying) capacity of the Lake Couchiching and Lake Simcoe ecosystems; and the phosphorous management for Lake Simcoe, including conformity with the requirements of the Lake Simcoe Protection Plan.

Also in Section 5 - Public and Private Infrastructure 5.2 I have added the following text:

- 1. Within the boundaries of the Lake Simcoe Protection, no new on-site sewage system or subsurface sewage works are permitted within 100 metres of the Lake Simcoe shoreline, other lakes or permanent streams, except for in the following circumstances:
 - a. A proposal for an on-site sewage system or subsurface sewage works that would serve an *agricultural use, agricultural-related use* or a public open space
 - b. A proposal for an on-site sewage system or subsurface sewage works that would replace or expand the capacity

of an existing on-site sewage system or subsurface sewage works hat will serve a use that would have been permitted by the applicable zoning by-law as of July 2009.

c. A proposal for an on-site sewage system or subsurface sewage works that relates to a development proposal for only one dwelling, where the proposal would have been permitted by and **met the provisions** *(emphasis added)* of the applicable zoning by-law as of July 2009.

I included "met the provisions" to provide clarity in the event someone applies for a severance, and they do not meet the minimum lot frontage requirements for example. You may recall over the last couple of years we have had instances where some have inferred that because the zoning allows for a house we should allow for the intensification even if there is not enough lot frontage to create a second lot.

Please let me know if this is acceptable and achieves the conformity in your opinion. Happy to discuss further if the above if you have additional changes, and again really appreciate you taking the time.

Thank you,

Jennifer Stong, BA, CPT

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Find your zoning! The Ramara Zoning By-law is now available on our <u>Mapping</u>! Click <u>here</u> to access user instructions and the video tutorial. A consolidated version of the Zoning By-law can be found at <u>www.ramara.ca/zoning</u>

We are open Monday through Friday from 9:00 a.m. to 4:30 p.m.

Unless stated otherwise, we will respond to all email or call inquiries or concerns within two business days. To access services after hours, visit our <u>online services</u> page or <u>website</u> for all the latest news and information. Remember to <u>stay informed</u> and <u>subscribe</u> to receive up to date information by email.

Join us for our Recreation Master Plan Open House on Wednesday, February 5, from 4 p.m. to 7 p.m. at the Township Administration Building. This is a great chance to share your ideas and provide input on the draft Recreation Master Plan's key recommendations. We look forward to hearing from you! To learn more, please visit: