



# PLANNING JUSTIFICATION REPORT

659 & 681 BALM  
BEACH ROAD, AND  
9050  
PENETANGUISHENE  
ROAD

TOWN OF MIDLAND  
SIMCOE COUNTY

PREPARED FOR :  
2798860 ONTARIO LTD., &  
1953518 ONTARIO LTD.

SEPTEMBER 2025

# **659 BALM BEACH ROAD**

TOWN OF MIDLAND,  
COUNTY OF SIMCOE

APPLICATION FOR

---

## **OFFICIAL PLAN AMENDMENT**

---

PREPARED BY

### **INNOVATIVE PLANNING SOLUTIONS**

647 Welham Road, Unit 9A  
Barrie, ON  
L4N 0B7  
TEL: (705) 812-3281  
FAX: (705) 812-3438

ON BEHALF OF

**'2798860 Ontario Ltd., & 1953518 Ontario Ltd.'**

SEPTEMBER 2025

## **TABLE OF CONTENTS**

1.0	INTRODUCTION .....	4
2.0	SITE DESCRIPTION .....	6
3.0	SURROUNDING LAND USES .....	12
4.0	PROPOSED DEVELOPMENT .....	15
4.1	APPLICATION: OFFICIAL PLAN AMENDMENT.....	16
5.0	CONSULTATION & FILE HISTORY .....	18
6.0	SUPPORTING TECHNICAL ITEMS .....	19
6.1	CONCEPT PLAN.....	19
6.2	FUNCTIONAL SERVICING & STORMWATER MANAGEMENT REPORT .....	19
6.3	ARCHEOLOGICAL ASSESSMENT .....	20
6.4	TRAFFIC IMPACT STUDY .....	21
6.5	ENVIRONMENTAL IMPACT STUDY .....	22
7.1	THE PLANNING ACT – PROVINCIAL INTEREST.....	24
7.2	PROVINCIAL PLANNING STATEMENT.....	27
7.2.1	<b>People and Homes</b> .....	27
7.2.2	<b>Settlement Areas</b> .....	29
7.2.3	<b>Infrastructure and Facilities</b> .....	30
7.2.4	<b>Natural Heritage</b> .....	31
7.2.5	<b>Mineral Aggregate Resources</b> .....	32
7.3	COUNTY OF SIMCOE OFFICIAL PLAN.....	35
7.3.1	<b>Growth Management Strategy</b> .....	35
7.3.2	<b>Growth Management Framework</b> .....	35
7.3.3	<b>Settlement Area</b> .....	37
7.3.4	<b>Healthy Communities and Housing Development</b> .....	40
7.3.5	<b>Affordable Housing</b> .....	41
7.3.6	<b>Aggregate Potential</b> .....	41
7.4	TOWN OF MIDLAND OFFICIAL PLAN.....	43
7.4.1	<b>Population and Employment Forecasts</b> .....	43
7.4.2	<b>Planning for Growth in an Urban Structure</b> .....	44
7.4.3	<b>Mix of Uses</b> .....	46
7.4.4	<b>Housing</b> .....	46
7.4.5	<b>Affordability and Attainable Housing</b> .....	47
7.4.6	<b>Neighbourhood Districts</b> .....	49
7.4.7	<b>Mixed-Use Corridor</b> .....	51
7.4.8	<b>Greenlands</b> .....	53
7.4.9	<b>Transportation</b> .....	55

7.4.10	<b>Servicing</b> .....	56
7.4.11	<b>Secondary Plan</b> .....	60
8.0	<b>CONCLUSION</b> .....	62
	<b>APPENDICES</b> .....	64

## **LIST OF FIGURES**

Figure 1.	Subject Lands
Figure 2.	Concept Plan
Figure 3.	Town of Midland Official Plan Designation
Figure 4.	Town of Midland Zoning By-law Zone Classifications
Figure 5.	Road Classifications
Figure 6.	Surrounding Area

## **LIST OF APPENDICES**

Appendix 1:	Draft OPA Schedule & Text
-------------	---------------------------

## 1.0 INTRODUCTION

Innovative Planning Solutions (IPS) has been retained by '**2798860 Ontario Ltd., & 1953518 Ontario Ltd.**' (Applicant/Owner) to complete a Planning Justification Report in support of an **Official Plan Amendment (OPA)** application for lands located at **659 & 681 Balm Beach Road and 9050 Highway 93** in the Town of Midland.

The proposed OPA would permit an efficient mixed-use residential and commercial opportunity on the subject lands. The proposal seeks to facilitate approximately 515 townhouse units, and 300 high density residential apartment units. An overview of the concept plan is provided in detail under Section 4 of this Report.

To permit the proposed development, an Official Plan Amendment (OPA) is first required to redesignate the lands from Natural Heritage to Mixed-use Corridor and Neighbourhood Residential. The OPA will establish the foundation in which the desired development can occur to transition the underutilized lands into an appropriate form of housing. Additionally, this OPA will facilitate future applications such as a Zoning Bylaw Amendment (ZBA) and Draft Plan of Subdivision (DPS) (and Site Plan Approval) to provide greater land use details, lot layout, and specific road network configurations. Currently this OPA application seeks to redesignate the lands to permit the future development and detailed design through additional Planning Act approvals (ZBA, DPS and SPA).

This Report will review the subject application in the context of applicable Provincial and Municipal policies to provide necessary rationale for the approval of the proposed development.

The Report will review the following documents to demonstrate consistency:

- Planning Act
- Provincial Planning Statement
- County of Simcoe Official Plan
- Town of Midland Official Plan
- Town of Midland Zoning By-Law

**Figure 1** -Provides an aerial illustration of the subject lands.



## 2.0 SITE DESCRIPTION

The lands are located within the Town of Midland which contain three main land sections. The first section municipally known as 659 Balm Beach Road has approximately 1.75 ha in area and 180 metres of frontage along Balm Beach Road, and currently contains a commercial building used as a billiards hall. The second section municipally known as 681 Balm Beach Road and legally known as Part of the North Half of Lot 104 Concession 1 W.P.R is approximately 16.75 ha in area and has approximately 22 metres of frontage along Balm Beach Road and 192 metres of frontage along Penetanguishene road. Additionally, the second section currently contains vegetative features throughout the lot with topographical elevations mostly located near Penetanguishene Road. A third section municipally known as 9050 County Road 93, Midland has approximately 36 metres of frontage and a general lot area of 0.26 ha. Currently these lands contain a single detached dwelling. The three sections will merge to form a consolidated land parcel should the application be approved and will be addressed herein as the 'Subject Land'. In total the Subject Lands include approximately **199.4** metres of frontage along Balm Beach Road, **214** metres of frontage along Penetanguishene Road, and a lot area of approximately 20.6 ha. (**'50.9'** ac.). The lot depth of the Subject Land is approximately **282** metres from Balm Beach to the southern property line and **875** metres from Penetanguishene Road to the west property line.

The topography of the site is unique, as seen in the Concept Plan (Figure 2) which indicates a non-developable area based on elevation change of approximately 10 metres which separates Areas 'C' and 'G' from the remaining development areas. The remaining areas identified as area 'A', 'B', 'D', 'E', 'F', 'I', & 'H' are generally level with grade sloping south away from Balm Beach Road.

Currently, the subject land is mainly wooded and predominantly vacant of buildings/structures. The only existing developed area of the Subject Lands is located within 659 Balm Beach site containing the Billiards Hall, parking area, and direct access to Balm Beach Road. Additionally, within Block G and parts of the Block C there is an existing single detached house.

The Subject Lands are located within the Town of Midland Settlement Area per the County of Simcoe Official Plan, as per Schedule 5.1 – Land Use Designations, and

designated as *Natural Heritage* and *Mixed-use Corridor* in the Town of Midland Official Plan Schedule C – Land Use. Additionally, the lands are zoned as *Highway Commercial Zone (HC)* and *Rural (RU)* in the Town's Zoning Bylaw 2004-90. The Subject Lands have access to both Penetanguishene Road and Balm Beach Road which are designated as *County Roads* in the Town of Midland Official Plan. Please refer to Figures 3, 4, and 5 for the breakdown of designations and zones for the Subject Lands.

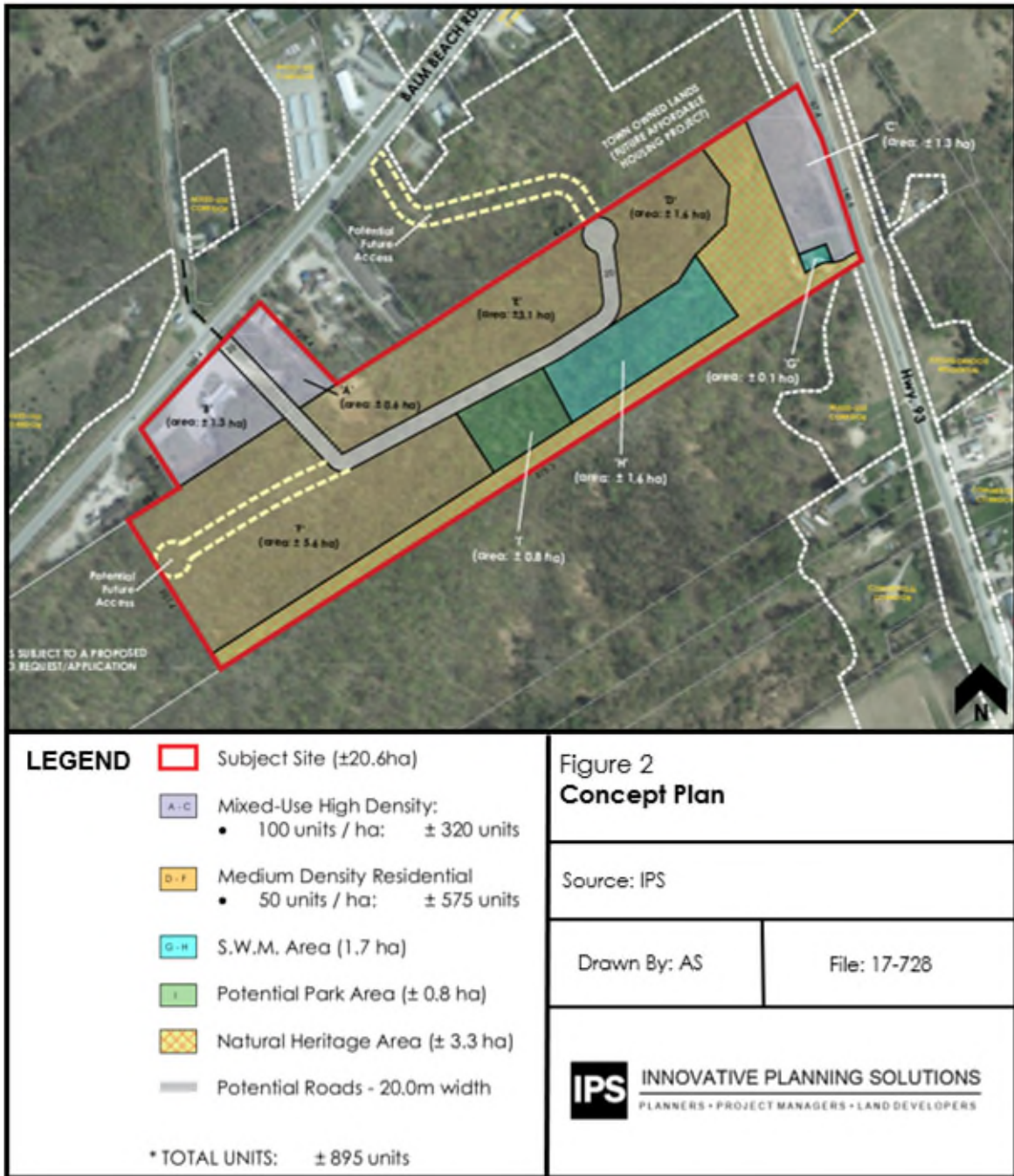
**Figure 2** -Provides the concept plan.

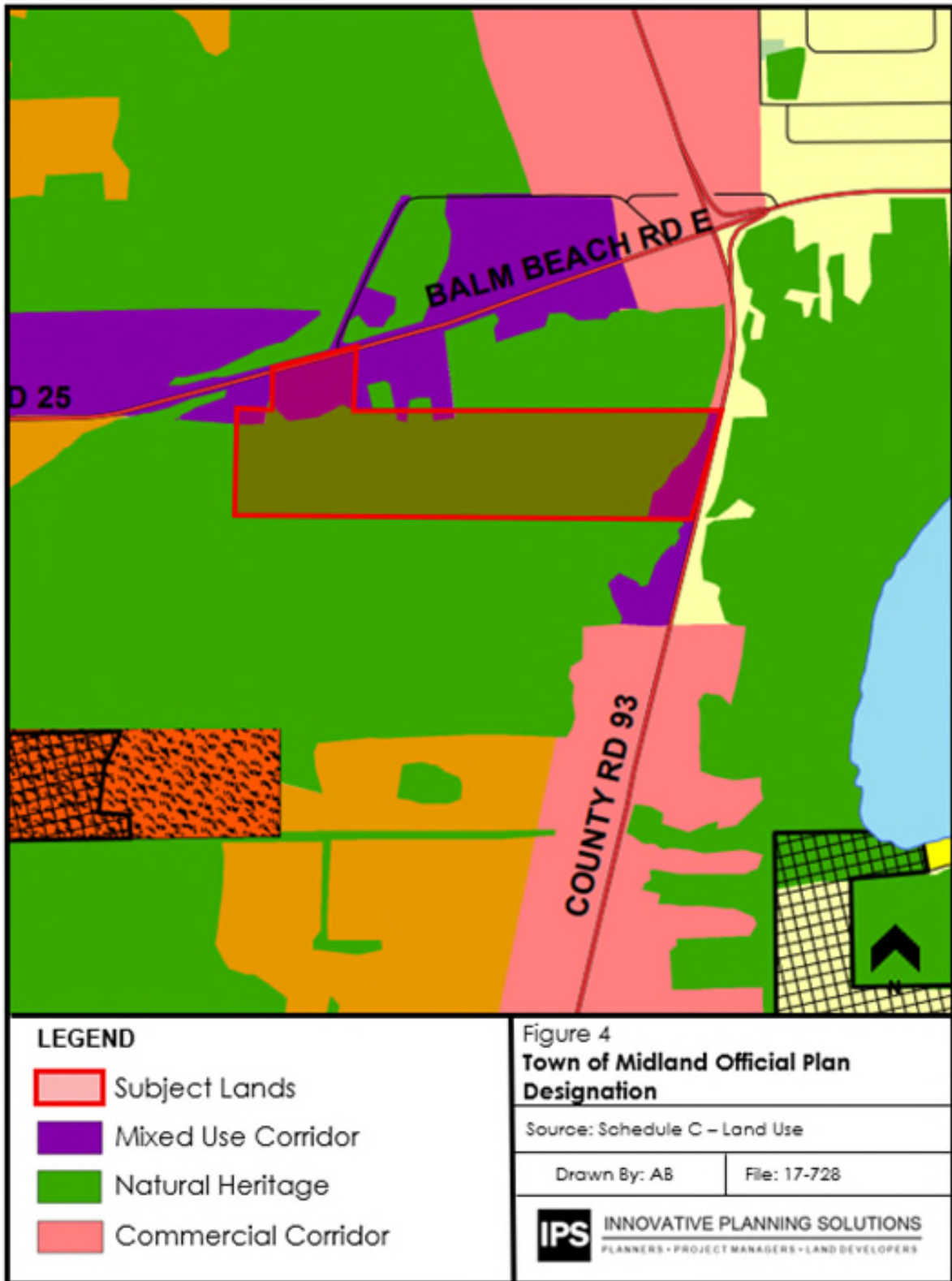
**Figure 3** - Official Plan Designations

**Figure 4** – Zoning By-law Classifications

**Figure 5** – Road Classifications









# LEGEND



Subject Lands

HC

Highway Commercial

RU

Rural

R1

Residential

Figure 4

## Town of Midland Zoning

Source: [https://opengis.simcoe.ca/?MAP\\_ID=zoning-midland](https://opengis.simcoe.ca/?MAP_ID=zoning-midland)

Drawn By: AB

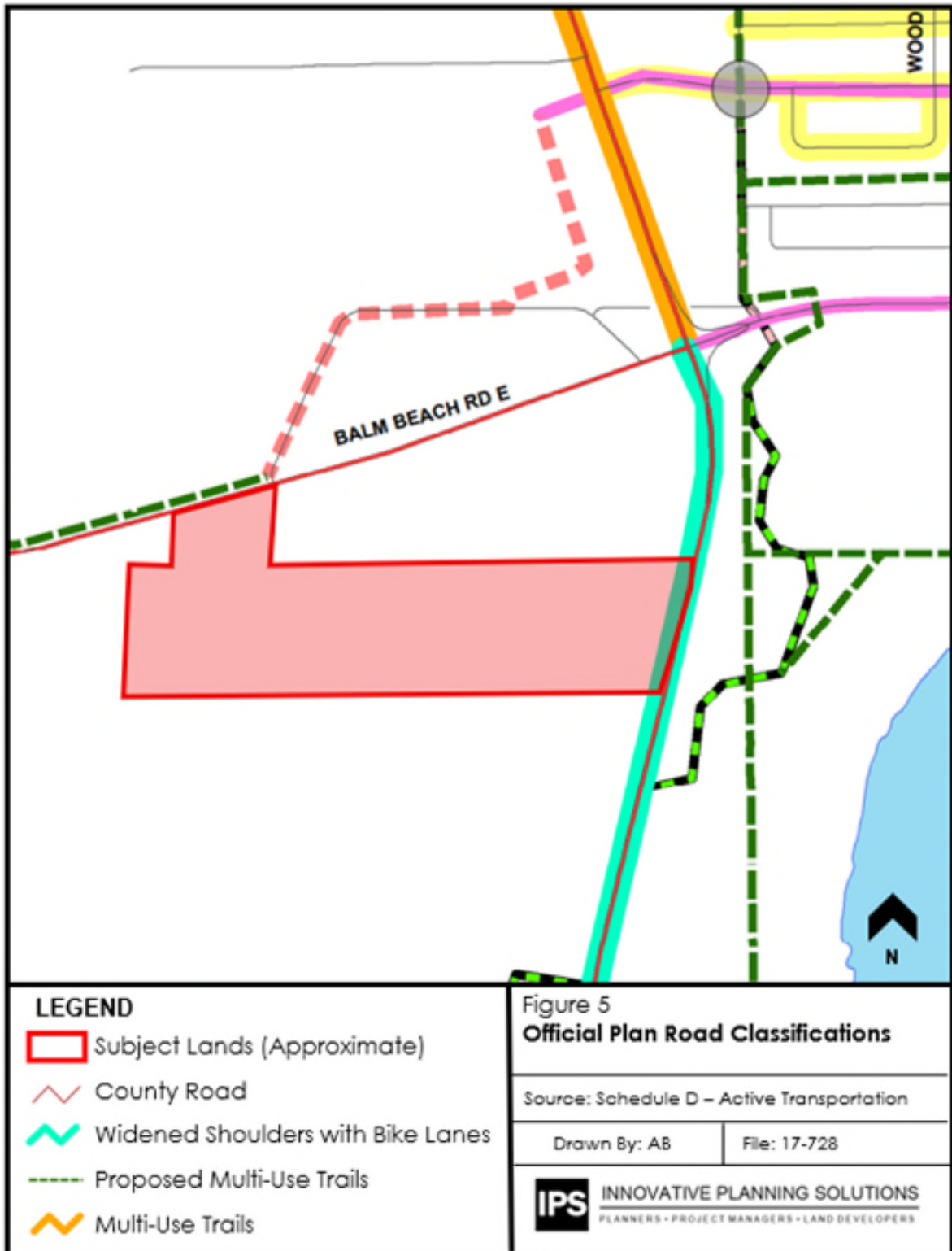
File: 17-728



INNOVATIVE PLANNING SOLUTIONS

PLANNERS • PROJECT MANAGERS • LAND DEVELOPERS





### 3.0 SURROUNDING LAND USES

The area surrounding the Subject Lands contain a mixture of developed areas and vacant vegetated areas. Understanding that the lands are located on the fringe of the urban built boundary as per Schedule 'A' of the Town's Official Plan, the context of surrounding area is quite unique.

Existing surrounding lands uses are diverse, including the following:

#### North:

- Adjacent lands to the north are designated '**Mixed-Use Corridor and Commercial Corridor**' and zoned '**Highway Commercial**'.
- These lands are partially within the Built Boundary and Secondary Plan Area.
- Immediately North contain various properties used for commercial uses, and a vacant lot (783 Balm Beach Rd E) owned by the Municipality and intended for a future Affordable Housing Project.

#### East:

- Adjacent lands on the east are currently designated '**Neighbourhood Residential and Natural Heritage**' and zoned '**Residential One**'.
- The areas fronting onto Penetanguishene Road are located within a Secondary Plan Area.
- Further east contains Little Lake. The majority of these lands contain undeveloped areas that are mainly wooded.

#### South:

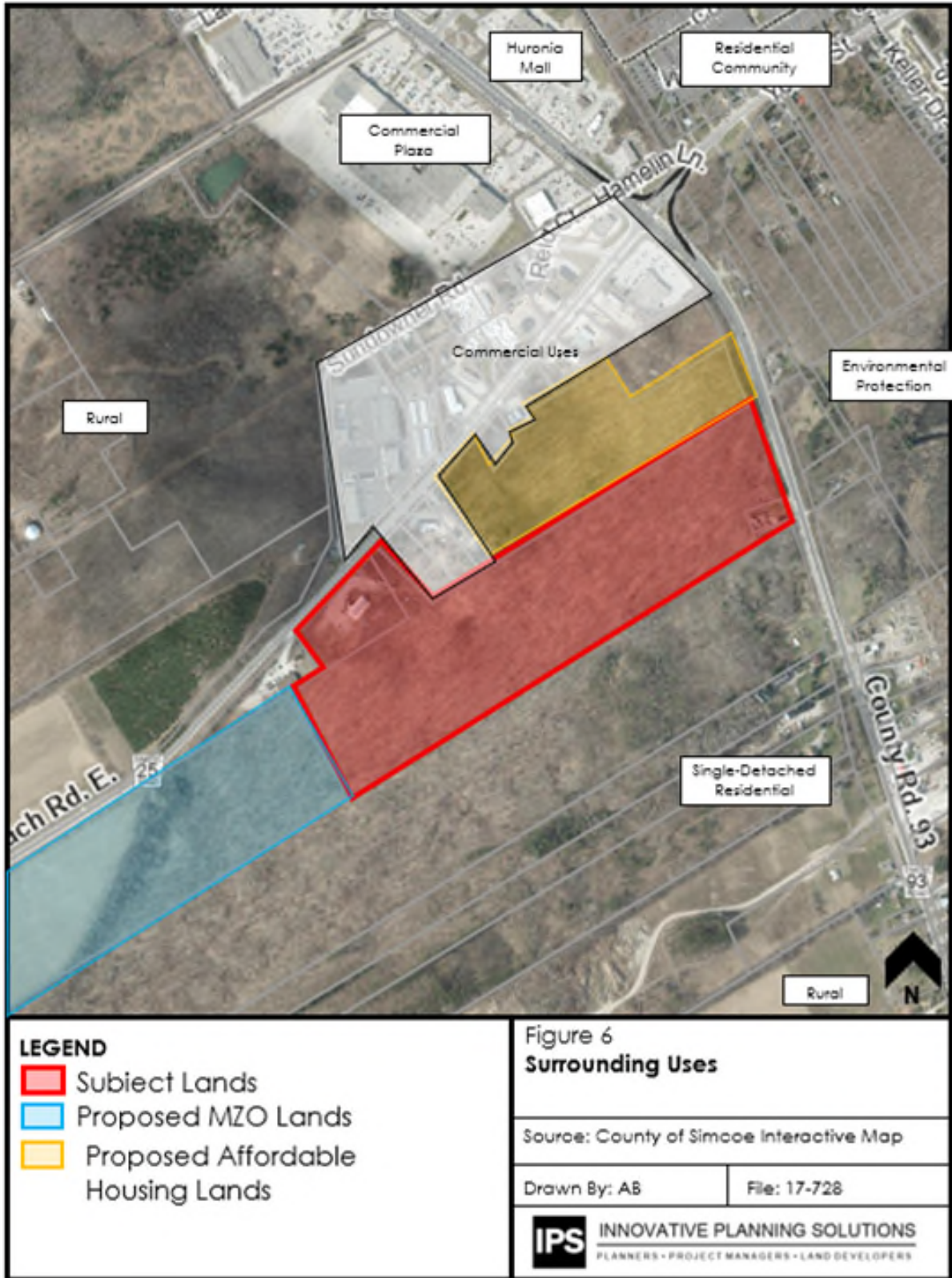
- Adjacent areas to the south are designated '**Natural Heritage**' and zoned '**Rural**'.
- Further to the Southwest of the Subject Lands contain an aggregate extraction area.
- Majority of the southern lands contain wooded and undeveloped land on large narrow lots and contain single detached houses positioned close to Penetanguishene Road.

#### West:

- Lands to the west are designated '**Natural Heritage**' and zoned '**Rural**'.

- Additionally, the adjacent parcel 565 Balm Beach Road is currently contemplating a development for a residential subdivision. As it stands currently, the lands are vacant with the western most portion being vegetated and the remainder being used for agricultural purposes.
- These lands have approached the Town with a development application as a requested Minister Zoning Order (MZO).

**Figure 6** provides an aerial illustration of the surrounding land uses.



---

## 4.0 PROPOSED DEVELOPMENT

The development proposes to re-designate an underutilized parcel of land within the Town of Midland to accommodate a range of uses and densities. Given that the Subject Lands are located on two county roads and small portions of the lands are included in both *delineated built boundary area*, *secondary plan area*, and *strategic growth area I* as per the Town's OP, the lands represent a prime opportunity to contribute to housing stock in the Town to align with the Town's growth policies. This contributes to the overall housing supply outlined by Provincial legislation and would assist in providing additional housing options to support the growth of Midland in an efficient and appropriate manner.

The proposed development seeks to provide a mix of housing and commercial options which are comprised of the following units types and uses:

- medium density residential units,
- mixed-use high density, and
- high density residential buildings

The proposed development will have vehicular access that connects from Balm Beach Road. The proposed road network as seen in **Figure 5** provides direct access to the medium density and mixed-use high density uses as well as future growth considerations/connections to abutting lands. Greater details and design of the road network layout and lot configurations will be provided through future ZBA/DPS applications.

Additionally, the proposal provides approximately 0.8 hectares of parkland and 1.6 hectares for stormwater management facilities that will serve the planned community and will be further detailed at subsequent Planning Act stages. It should be noted that an environmental buffer area & non-development area, identified in Figure 2 as Natural Heritage Area, is intended to offer protection of existing vegetation and opportunities to integrate active transportation through pedestrian trails promoting an active community at a future design stage, while also offering natural heritage buffering to the south.

The proposed mixed-use development is located along Balm Beach Road and Pentanguishene Road, as these areas are designated as *Mixed-use Areas* in the



---

Town of Midland Official Plan. Additionally, understanding the context of the Town of Midland, Blocks A, B, and C front onto *County Roads* which are areas targeted for development. Thus in the context of the road classification and the land use designation the proposed higher density development is oriented towards these transportation networks. Furthermore, the proposed development provides transition from the high density residential uses along the existing roads to lower density uses more central to the site.

Additionally, there are Stormwater Management Ponds, one located centrally and adjacent to the Open Space Area, and the other located Adjacent o Block C. These blocks have been included to ensure the efficient servicing and stormwater management of the Proposed Development. The location between the identified Natural Heritage Areas and park area supports active and passive transportation/recreational uses in the Proposed Development. Finally, two potential future accesses for the Proposed Development are identified in the Concept Plan. One connecting to the lands north of the Subject Lands, which are contemplated for a affordable housing development. The other connecting west of the Subject Lands that are contemplating the development of a residential subdivision.

**Figure 2** concept plan

## 4.1 APPLICATION: OFFICIAL PLAN AMENDMENT

To facilitate the proposed development an Official Plan Amendment (OPA) to re-designate the the Subject Lands is required. The purpose of the OPA is to re-designate the lands from *Greenlands & Natural Heritage* designations as per Schedule A, B, & C of the Town's OP to the following designations:

Block	Proposed Designation
A	<i>Mixed-use Corridor</i>
B	Mixed-use Corridor
C	Mixed-use Corridor
D	<i>Neighbourhood</i>
E	<i>Neighbourhood</i>
F	<i>Neighbourhood</i>
G	Mixed-use Corridor

---

H	<i>Neighbourhood</i>
I	<i>Neighbourhood</i>
Natural Heritage Area	<i>Natural Heritage</i>

The proposed amendment to the Official Plan will allow for the Subject Lands to be further developed with additional Planning Act applications (ZBA/DPS/SPA) and contribute to the housing options within the Town of Midland. Additionally, the proposed changes seek to align with existing characteristics and future growth of the surrounding area, specifically abutting lands to the west, Secondary Plan area, and areas within the delineated built boundary.

Additionally, an amendment to Section 7.2.4 of the Town of Midland Official Plan is requested to permit the development of a portion of 681 Balm Beach Road and 9050 County Road 93 prior to completion of the South Secondary Plan Area. It is our intention that the portion of the Subject Lands located within the Secondary Plan area will achieve a similar outcome by establishing a comprehensive land use policy framework for the entire Subject Lands.

---

## **5.0 CONSULTATION & FILE HISTORY**

A pre-consultation meeting was held with the Town of Midland on December 20<sup>th</sup>, 2023, where planning and other departmental comments were received in relation to the subject proposal. Town staff have provided a list of required reports and plans that are to be completed and submitted with the Official Plan Amendment (OPA) application to aid in a thorough review of the proposed development; it was also discussed that the applicant would only submit an OPA as a first stage, and subject to approval, the applicant would proceed with Zoning Bylaw Amendment and Draft Plan of Subdivision. In addition to this Planning Justification Report, the following have been prepared and submitted under separate cover in support of this application:

- Environmental Impact Study prepared by Cambium Engineering
- Stage 1-2 Archeological Assessment prepared by Irvin Heritage
- Traffic Impact Study prepared by JD Engineering
- Functional Servicing and Stormwater Management Report prepared by Crozier Engineering
- Concept Plan prepared by IPS consulting
- Draft Official Plan Amendment prepared by IPS consulting

---

## 6.0 SUPPORTING TECHNICAL ITEMS

To support the Official Plan Amendment (OPA) application, multiple technical reports/documents have been prepared for submission in support of the proposal, including:

### 6.1 *CONCEPT PLAN*

A Concept Plan has been prepared by Innovative Planning Solutions dated June 26<sup>th</sup>, 2025. This Concept Plan outlines a high level overview of the proposed development and the proposed uses contained in each block area.

### 6.2 *FUNCTIONAL SERVICING & STORMWATER MANAGEMENT REPORT*

A Functional Servicing and Stormwater Management Report has been prepared by C.F Crozier & Associates Inc., dated August 6<sup>th</sup>, 2025, in support of the proposed development. The report outlines a comprehensive and feasible servicing strategy to support each development component within the subject area. The key servicing components captured within the Functional Servicing Report include the following:

- Access to the Subject Lands will be provided by one entrance along Balm Beach Road at the intersection with Sundowner Road, with a potential future connection with the adjacent development to the west. The internal roadways will meet Town Standards and provide access for emergency vehicles.
- Blocks A, B, D, E, and F will be serviced by a gravity sanitary sewer discharging to the proposed pumping station located in the southeast portion of the Subject Lands (Pumping Station A). Block C will have a sanitary pumping station (Pumping Station B) that pumps the sanitary to the top of the slope through the natural heritage area, before draining by gravity to Pumping Station A. To note, Block Area C and Block Area G will be consolidated into a singular developable area. A forcemain will discharge all the development sanitary sewage from Pump Station A to the edge of development near Balm Beach Road which will then drain by gravity to the existing municipal sanitary system on Balm Beach Road. Wastewater will then follow the existing sewer network, ultimately discharging to the Town of Midland Wastewater Treatment Centre.

- 
- The proposed watermain system will be provided through the Subject Lands with one connection to the existing watermain on Balm Beach Road. This watermain will terminate at the proposed cul-de-sac which offers further extension through the potential future access should the abutting lands to the north be developed. A separate watermain is proposed for Block C/G through Penetanguishene Road.
  - The development will be fully serviced by hydro, natural gas, cable, and telecommunications.
  - A wet pond SWM Facility will provide both quality and quantity control for Blocks A, B, D, E, and F. The proposed SWM Facility is adequately sized to provide “enhanced protection” level treatment while controlling post-development flows to pre-development levels for all storms up to the 100-year storm event. The facility will incorporate 24-hour detention of the 25mm event to provide erosion control.
  - Separate quality and quantity controls will be required to control post-development flows to pre-development flows for Block C and Block G, which is located downhill of the SWM Facility. The specifics of the stormwater management system for Block C/G will be confirmed at detailed design.

### 6.3 ARCHEOLOGICAL ASSESSMENT

A Stage 1 & 2 Archaeological Assessment Report has been prepared by Irving Heritage Inc., in support of the proposed development. This report and study outlines the potential and confirmation of any archaeological findings.

- The Stage 1 Archaeological Assessment indicated that the Study Area contained one or more indicators of archaeological potential, requiring a Stage 2 assessment.
- As such, a Stage 2 Archaeological Assessment consisting of a 5 m Transect Test Pit Survey was conducted.
- The Study Area was found to contain extant and serviced structures with associated parking areas adjacent to a small, grassed area which was subject to a 5 m transect Test Pit Survey and found to be disturbed. Various small outbuildings were noted around the area of the larger extant structure and parking area.

- 
- The balance of the Study Area consisted of woodlot which was subject to a 5 m transect Test Pit Survey. The Study Area was found to contain sandy soils with a generally shallow top-soil horizon.
  - The completed Test Pit Survey of lands not viable to plough resulted in the discovery of no archaeological resources.
  - Given the results and conclusions of the completed Stage 1 & 2 Archaeological Assessment, the following recommendations are made:
    - It is the professional opinion of the archaeological licensee, Thomas Irvin (P379) that the Study Area has been sufficiently assessed and is free of further archaeological concern.
    - Notwithstanding the above recommendations, the provided Advice on Compliance with Legislation shall take precedent over any recommendations of this report should deeply buried archaeological resources or human remains be found during any future earthworks within the Study Area.

#### 6.4 *TRAFFIC IMPACT STUDY*

A Transportation Impact Study has been prepared by JD Engineering Inc., dated July 18th, 2025. The Study has included a review the internal road networks are sufficient for the proposed use and that any adverse impacts that may result to the external road system can be appropriately mitigated. The following is a summary of findings from JD Engineering Inc:

- The proposed development is estimated to generate 445 AM and 540 PM new peak hour vehicle trips in the study area.
- Detailed traffic and pedestrian counts were conducted at the study intersections in November 2024.
- An intersection operational analysis was completed at the study area intersections, using the existing (2025) and background (2028, 2033 and 2038) traffic volumes, without the proposed development traffic. This enabled a review of existing and future traffic deficiencies that would be present without the influence of the proposed development. The following improvements are recommended:

---

## County Road 93 / County Road 25 & Yonge Street

### Background (2038)

- Traffic signal optimization and increased cycle length (100s to 110s)
- An estimate of the amount of traffic that would be generated by the Subject Site was prepared and assigned to the study area roads and intersections.

### 6.5 ENVIRONMENTAL IMPACT STUDY

An Environmental Impact Study (EIS) has been prepared by Cambium Inc., dated August 15th, 2025. The EIS serves to outline and assess the potential impacts to natural heritage features identified during the preliminary development review process. The EIS has concluded the following:

- All required approvals and permits should be obtained prior to the commencement of site alteration or construction activities.
- Vegetation removal or alteration should take place outside the breeding bird season (April 1 to August 31) and the active roosting period for bats (April 1 – September 30). Should any clearing be required during the breeding bird season, nest searches conducted by a qualified person must be completed within 48 hours prior to clearing activities. If nests are found, work within the area must cease until the nest has fledged, as per the federal Migratory Birds Convention Act. Should any clearing be required during the active roosting period for bats, please contact the Ministry of Environment, Conservation and Parks for further direction (e.g., acoustic monitoring, exit surveys) to ensure conformity with the Endangered Species Act.
- An Edge Management Plan should be developed for the new forest edge to be established along the southern Site boundary. Consideration should be made to both wind shear and forest health, but also in the re-establishment of the interior forest habitat and enhancement to avifauna habitat by incorporating enhancement initiatives, such as strategies outlined in the Area-Sensitive Forest Birds in Urban Areas (Environment Canada, 2007).

- 
- Natural Heritage Area should remain as naturally self-sustaining vegetated lands, protected from future development.
  - It is recommended that written approval/documentation of consultation with MECP, or a demonstration of policy conformity with respect to SAR bats, be included as a Draft Plan condition following the implementation of Bill 5 and the Species Conservation Act.
  - The Stormwater Management Plan prepared for the Site should specifically address potential stormwater-related impacts to water quality and quantity of the surrounding features, erosion potential, and a feature-based water balance study (if required).
  - An Erosion and Sediment Control (ESC) Plan that includes perimeter light duty sediment fencing should be implemented along the watercourse side of the construction area prior to the commencement of any Site alteration.
  - Though not identified in the field inventories, any subsequently identified SAR discovered on the property must be left undisturbed as required by the *Endangered Species Act, 2007*. If any SAR individuals are encountered, they should be photographed and allowed time to move out of harm's way. All SAR observations should be reported to the MNRF Natural Heritage Information Centre.



---

## 7.0 PLANNING POLICY & ANALYSIS

The following sections will outline the applicable policies guiding the development of the Subject Lands. Each section will outline applicable plans and policies with planning rationale on conformity and development principles.

### 7.1 THE PLANNING ACT – PROVINCIAL INTEREST

The Planning Act (The Act) is Provincial legislation that establishes the ground rules for land use planning in Ontario. It describes how land uses may be controlled, and who may control them. The Act promotes sustainable development while balancing factors such as preservation of the natural environment and the creation of healthy communities, within a provincial framework focused on provincial interests and fairness.

The policies as set out in Section 2 of the Planning Act, inform the Provincial Planning Statement (PPS), and other matters of provincial interest, ensuring consistency with the Act.

Under Section 2 of the Planning Act, key matters of provincial interest includes:

- (a) *The protection of ecological systems, including natural areas, features and functions.*
- (d) *the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;*
- (e) *The supply, efficient use and conservation of energy and water.*
- (f) *the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;*
- (h) *The orderly development of safe and healthy communities.*
- (j) *The adequate provision of a full range of housing, including affordable housing.*
- (l) *the protection of the financial and economic well-being of the Province and its municipalities;*
- (o) *The protection of public health and safety.*
- (p) *The appropriate location of growth and development.*
- (q) *The promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians.*
- (r) *the promotion of built form that,*

- 
- (i) *is well-designed,*
  - (ii) *encourages a sense of place, and*
  - (iii) *provides for public spaces that are of high quality, safe, accessible, attractive and vibrant*

The OPA application has considered S. 2 of the Planning Act by:

- With regards to ecological systems, development setbacks and remediation efforts are integrated within the design of the proposed development. Specifically, mitigation efforts such as the introduction of an Edge Management Plan to maintain the remaining woodland and controls are recommended and would be implemented at a future stage. This can be seen in Block highlighted as Natural Heritage Area in Figure 2, Concept Plan. Additionally, environmental studies have identified any natural areas and features and provided for their retention as appropriate. More details are disclosed in the Environmental Impact Study (EIS) prepared by Cambium, dated August 15<sup>th</sup>, 2025. Therefore, the Proposed Development has regard for the protection of ecological systems.
- An engineering review has confirmed that the Proposed Development can be serviced through the extension of existing water and wastewater services. The Servicing Report prepared by C.F Crozer & Associates, dated August 2025 has identified that the Blocks can be serviced through the use of pumping stations and connections to the existing sewer and water network located on Balm Beach Road. A traffic engineering study has confirmed the existing road network has available capacity to safely accommodate the Proposed Development.
- .
- The proposed development provides a range in land use designation to contribute to the housing mix within the Town of Midland. Additionally, this would assist in providing generally more attainable units when compared to low density residential housing options.
- The subject property is located within the Town of Midland, identified as a Settlement Area, as such is an appropriate location for development contributing to the overall community. The Subject Lands are a prime location for development being within vicinity of the Urban Core of Midland and directs development away from agricultural lands and also has the potential to alleviate development pressure within existing established neighbourhoods. Additionally, as discussed in the EIS the Proposed Development with mitigation efforts minimizes negative impact to the natural features.
- The proposed land designations contribute to urban design and adhering to development standards resulting in a sense of place, connectivity, and community. Future applications in the potential ZBA, DPS, and SPA will

---

provide more details on the design and how it will adhere to creating well designed spaces and a sense of place however the proposed OPA provides the ability to ensure regard is had for this provincial interest.

In our professional opinion, the proposed development aligns with and has regard for the Province's interest in land use planning.

---

## 7.2 PROVINCIAL PLANNING STATEMENT

Section 3(1) of The Act provides the Province with authority to issue policy statements which relate to matters of provincial interest.

The Provincial Planning Statement, 2024 (PPS) articulates the Province's interests with regards to land use planning and development policy. It provides a policy foundation that: "regulating the development and use of land province-wide, helping achieve the provincial goal of meeting the needs of a fast-growing province while enhancing the quality of life for all Ontarians" (PPS. pg. 2). The proposed development has been reviewed against PPS policies to confirm consistency with policy direction in matters of provincial interest in land use planning and development.

The PPS is comprised of four main sections. These include the following:

- Chapter 2: Building Homes, Sustaining Strong and Competitive Communities; and,
- Chapter 3: Infrastructure and Facilities
- Chapter 4: Wise Use and Management of Resources
- Chapter 5: Protecting Public Health and Safety

This Report has reviewed the following PPS policies in relation to the proposed OPA application and considers the following matters relevant to the proposed development.

### 7.2.1 PEOPLE AND HOMES

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

- a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and*
- b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.*

2.1.5 *Where planning is conducted by an upper-tier municipality, the land and unit supply maintained by the lower-tier municipality identified in policy 2.1.4 shall be based on and reflect the allocation of population and units by the upper-tier municipality.*

2.1.6 *Planning authorities should support the achievement of complete communities by:*

- a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment,*

---

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

*b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and*

*c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.*

The proposal remains consistent with Section 2.1 of the PPS as it:

- Will provide a range in housing units and densities in the form of medium and high density uses contributing to growth projections.
- Would facilitate the development of +/-895 units with a unique housing mix and range of prices to ensure attainable housing is provided. Additionally, small scale employment opportunities are provided through mix-use designations contributing to community building initiatives and contributing towards a complete community.
- A Traffic impact study has been conducted and provided in this submission indicating the access and transportation capabilities of the proposed development.
- Planning is conducted by the County of Simcoe as the upper tier municipality for the Town of Midland and establishes population allocation within the County Official Plan (Table 1) up to 2031. Consistent with Section 2.1.5 which refers to the land and unit supply in 2.1.4, the PPS allows Planning Authorities – County of Simcoe and/or Town of Midland to plan for this type of growth (residential) for more than 15 years. The proposed development represents an opportunity to provide residential growth within a settlement area in a manner that is consistent and compatible with the character of the existing community including servicing ability and would contribute to the supply of lands available for residential growth. Additionally, the proposal contributes to the overall growth forecasts for the municipality and County.
- The proposed development has been designed in coordination with the policies for healthy and safe communities through consideration of open space and trail connections, along with consideration of safe and active transportation networks including potential connections to adjacent lands.

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

*b) permitting and facilitating:*

- 1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including*

---

*additional needs housing and needs arising from demographic changes and employment opportunities; and*

2. *all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;*
- c) *promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation;*

The proposal remains consistent with Section 2.2 of the PPS as it:

- Will facilitate a range in housing units and densities in the form of medium and high density uses including a potential variety of townhouse units and mid rise apartment units. The mix of housing options will provide adequate transition from high density uses to medium density internally. Shown in the Concept Plans blocks A, B, and C will front onto County Roads and be the highest density use offering a range of housing & commercial opportunities, following with the internal blocks D, E, and F as medium density.
- Proposes a range of units that vary in prices creating both attainable and market price housing.
- Proposes densities that will efficiently utilize the lands while protecting existing features.
- Considers and implements recreation trails and active transportation networks supporting active living, along with future potential connections to adjacent lands fostering greater connectivity.

## **7.2.2 SETTLEMENT AREAS**

2.3.1.1 *Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.*

2.3.1.2 *Land use patterns within settlement areas should be based on densities and a mix of land uses which:*

- a) *efficiently use land and resources;*
- b) *optimize existing and planned infrastructure and public service facilities;*
- c) *support active transportation;*
- d) *are transit-supportive, as appropriate;*

2.3.1.3 *Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.*

---

The proposal remains consistent with Section 2.3 of the PPS by:

- Providing development in a Settlement Area, Midland, in which development and growth are encouraged.
- Proposing an appropriate mix of land use patterns that is conducive for efficient and strategic growth for the surrounding area.
- Providing development on underutilized lands to contribute to a complete community; this is achieved by providing a range in land use designations and future housing options that are supportive of the surrounding environment.
- The site is located along Balm Beach Road where the municipality has invested in new servicing infrastructure and is considered a gateway into the Town; the proposed development intends to leverage these characteristics and existing public service facilities while providing connections to future adjacent development lands.
- Promoting active transport and connections through trail networks that will connect to County roads to provide multi-modal connections and transportation options. These assets will be further refined through detailed design stages.

### **7.2.3 INFRASTRUCTURE AND FACILITIES**

3.6.2. *Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.*

3.6.8 *Planning for stormwater management shall:*

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

- 
- g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale.*

The proposal remains consistent with policies noted above by:

- Providing a Stormwater Management Report prepared by Crozier Engineering which indicates the servicing details and capacity for the proposed development at this stage, understanding further details will be examined should the application be approved.
- Making efficient use of municipal servicing as preferred by the PPS and at no cost to the existing taxpayer.
- Providing for Parks and Open Space to accommodate the proposed development and interconnected trail network.

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

- a) planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate active transportation and community connectivity;*
- b) planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;*

The proposal remains consistent with policies noted above as the proposed development provides:

- Opportunities for active transportation and public spaces within the development, including opportunities to connect with adjacent developments.

#### **7.2.4 NATURAL HERITAGE**

- 4.1.1 Natural features and areas shall be protected for the long term.*
- 4.1.2 The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.*
- 4.1.3 Natural heritage systems shall be identified in Ecoregions 6E & 7E<sup>1</sup>, recognizing that natural heritage systems will vary in size and form in settlement areas, rural areas, and prime agricultural areas.*
- 4.1.5 Development and site alteration shall not be permitted in:*



- 
- b) *significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)*
  - d) *significant wildlife habitat;*

*unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.*

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

4.1.8. *Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.*

The proposal remains consistent with policies in section 4.1 as the proposed development:

- Would include mitigation strategies (as outlined by Cambium Inc) in which wildlife habitats would be preserved though the retained (and remaining adjacent) Natural Heritage lands.
- Is supported by an EIS by Cambium Inc which identifies Significant Woodland on the site, however provides a series of mitigation measures to be implemented in order to ensure the development can proceed without adversely impacting natural heritage and hydrological features and functions identified on or adjacent to the Site.

#### **7.2.5 MINERAL AGGREGATE RESOURCES**

4.5.2.5 *In known deposits of mineral aggregate resources and on adjacent lands, development and activities which would preclude or hinder the establishment of new operations or access to the resources shall only be permitted if:*

- a) *resource use would not be feasible; or*
- b) *the proposed land use or development serves a greater long-term public interest; and*
- c) *issues of public health, public safety and environmental impact are addressed.*

The proposal remains consistent with policies in section 4.5.2 as :

- Only a small portion of the site contains known aggregate deposits which is insufficient to support an economically viable extraction of the resource and is therefore resource use is not considered feasible. The area of land with

---

identified aggregate deposits is shown on Schedule 5.2.1 (illustrated in Figure 7) of the County of Simcoe Official Plan and represents an approximate area of 1.3 hectares, representing approximately 6.3% of the Subject Lands.

- The proposed land use serves a greater long-term public interest in permitting a range of uses in an appropriate location and strategic growth including a variety of housing and economic opportunities.
- Issues of public health, safety and environmental impact have been assessed and will continue to be evaluated by the proposed development in support of land uses which will preclude aggregate extraction

Overall, the proposed development is consistent with the PPS through the development of the vacant and underutilized lands which are within a settlement area, designated for intensification and development. Further, the development is supported through the connection of existing infrastructure. Finally, considers the naturally significant areas and adequately mitigates impact to the ecological system.



#### LEGEND



Subject Lands

Figure 7  
**Aggregate Potential**

Source: County of Simcoe Interactive Map

Drawn By: RB

File: 17-728



**INNOVATIVE PLANNING SOLUTIONS**  
PLANNERS • PROJECT MANAGERS • LAND DEVELOPERS

---

## 7.3 COUNTY OF SIMCOE OFFICIAL PLAN

The County Official Plan was approved on December 29, 2016. The County Official Plan provides the framework for growth and development in Simcoe County.

The Subject Lands form part of a Settlement Area within Schedule 5.1: Land Use Designations (see Figure 3). The following policies are relevant to the consideration of the proposed development; it is also noted that the Town of Midland is considered a Primary Settlement Area in the context of the County Plan.

### 7.3.1 GROWTH MANAGEMENT STRATEGY

- 3.1.1 *Direction of a significant portion of growth and development to settlements where it can be effectively serviced, with a particular emphasis on primary settlement areas*
- 3.1.4 *Development of communities with diversified economic functions and opportunities and a diverse range of housing options*

The Proposed Development conforms with the policies noted above as they relate to growth management strategy by:

- Providing growth within a primary settlement area which has adequate provision of services.
- Providing mitigation strategies for ecological functions where necessary as discussed in the EIS. These strategies include, but are not limited to, an edge management plan and development controls.
- Providing efficient mixed-use development where appropriate, along Balm Beach and Penetanguishene Road, which aids in providing diversified economic functions.
- Including a mix of housing options in the form of both medium and high density built forms.

### 7.3.2 GROWTH MANAGEMENT FRAMEWORK

- 3.2.3 The majority of population and employment growth will be directed to settlement areas with particular emphasis on primary settlement areas. Municipalities with primary settlement areas will direct a significant portion of population and employment growth forecasted to the applicable primary settlement areas. A proportion of new growth will be accommodated through intensification according to the targets set out in Section 3.5. The primary settlement areas will

---

develop as complete communities. Other settlement areas may over time develop towards becoming a complete community, where appropriate, based on the hierarchy described in 3.5.

- 3.2.4 The majority of population and employment growth will be directed to settlement areas with full municipal water services and municipal sewage services. Limited growth will be permitted in settlement areas that are serviced by other forms of water and sewage services with appropriate studies provided to support the servicing systems proposed and in accordance with Section 4.7 of this Plan.

The Proposed Development conforms with the policies noted above as they relate to growth management framework by:

- Providing residential and mixed-use development within a primary settlement area to assist in achieving growth targets.
- Creating a complete community by providing a mix of land use designations to create a healthy and active community.
- Directing development into areas that can be efficiently serviced by municipal water and sewage.

### **7.3.3 Natural Heritage Policies**

3.3.15 Despite anything else in this Plan, except Section 4.4 as it applies to mineral aggregate operations only, development and site alteration shall not be permitted:

- ii. In the following unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions: Significant woodlands, significant valleylands, significant wildlife habitat, significant areas of natural and scientific interest (ANSIs), and coastal wetlands (not covered by 3.3.15 i) above).
- v. In habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.
- vi. On adjacent lands to the natural heritage features and areas listed above, unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions. Adjacent lands shall generally be considered to be:

- 
- a. within 120 metres of habitat of endangered species and threatened species, significant wetlands, significant coastal wetlands, wetlands 2.0 hectares or larger determined to be locally significant by an approved EIS, significant woodlands, significant wildlife habitat, significant areas of natural and scientific interest – life science, significant valleylands, and fish habitat;

The Proposed Development conforms with the policies noted above as they relate to Natural Heritage by:

- Conducting an EIS that indicated mitigation and management strategies that will allow for the Proposed Development to minimize the impact on the surrounding Natural Heritage Features.
- Would include mitigation strategies (as outlined by Cambium Inc) in which wildlife habitats would be preserved though the retained (and remaining adjacent) Natural Heritage lands.
- Is supported by an EIS by Cambium Inc which identifies Significant Woodland on the site, however provides a series of mitigation measures to be implemented in order to ensure the development can proceed without adversely impacting natural heritage and hydrological features and functions identified on or adjacent to the Site.

### **7.3.3 SETTLEMENT AREA**

- 3.5.1 To focus population and employment growth and development within settlements, with particular emphasis on primary settlement areas, in accordance with the policies of this Plan.*
- 3.5.2 To develop a compact urban form that promotes the efficient use of land and provision of water, sewer, transportation, and other services.*
- 3.5.3 To develop mixed use settlements as strong and vibrant central places and to create healthy settlements and communities that are sustainable.*
- 3.5.4 To promote development forms and patterns which minimize land consumption and servicing costs.*
- 3.5.5 To promote healthy, complete, and accessible urban and rural communities that are in proximity to amenities, support services, and transit.*

The Proposed Development conforms with policies noted above as they reflect development and growth in a primary settlement area by:

- Contributing to the housing stock and mix of housing options to help achieve targets housing within Midland .

- 
- Providing housing options that are accessible to various income levels, as the proposed intends to have a mix of medium and high density housing options .
  - Contribute a variety of amenities and access to transportation options such as trails, walkable streets, and roadways.
  - Making efficient use of existing and new infrastructure with a form of development which minimizes land consumption and servicing costs.
  - Providing Mixed-use Areas along Balm Beach Road & Penetanguishene Road to create vibrant and strong places to aid in creating complete communities.

- 3.5.7 *Primary settlement areas are settlement areas and are shown on Schedule 5.1.2 of this Plan. Primary settlement areas are larger settlements suitable for high intensification targets, public transit services, and high density targets for designated Greenfield areas and have full municipal water services and municipal sewage services. Primary settlement areas will develop as complete communities. Municipalities with primary settlement areas will, in their official plans, focus and direct a significant portion of its population and employment forecasted growth to the applicable primary settlement areas while considering growth in other settlement areas through local growth management studies as per Section 3.5.9. Municipalities with primary settlement areas will, in their official plans, identify primary settlement areas, identify and plan for intensification areas within primary settlement areas and ensure the development of high quality urban form and public open spaces within primary settlement areas through site design and urban design standards that create attractive, inclusive and vibrant places for residents of all ages and abilities that support walking and cycling for everyday activities and are transit-supportive.*
- 3.5.8 *Settlement areas shall be the focus of population and employment growth and their vitality and regeneration shall be promoted. Lands may only be redesignated from lands not for urban uses to lands for urban uses in accordance with Sections 3.5.9 or 3.5.11 of this Plan. Residential, commercial, industrial, institutional, and recreational land uses shall be developed within settlement area boundaries on land appropriately designated in a local municipal official plan for the use. Land use designation changes within settlement area boundaries do not require a County Official Plan amendment. The uses permitted in the land use designations within settlement area boundaries may be further restricted or prohibited in the local municipal official plans in order to facilitate urban development.*
- 3.5.10 *Development may be approved in settlement areas in excess of what is needed to accommodate the forecasts in Table 1, provided the development:*
- a) *Contributes to the achievement of the density targets or intensification targets as applicable, in accordance with sections 3.5.24 and 3.5.25 of this Plan;*

- 
- b) *Is on lands for urban uses as of January 19, 2012;*
  - c) *Can be serviced in accordance with applicable provincial plans, provincial policies and section 4.7 of this Plan;*

3.5.24 *The compact development of settlements as stated in Section 3.5.2 shall be based on specific density targets for local municipalities in Simcoe County. Accordingly, it is a policy of this Plan that development on designated Greenfield areas will be planned to achieve a minimum density target of residents and jobs combined per hectare as follows:*

*Town of Midland = 50*

3.5.25 *Intensification, or directing of development to the built-up area and serviced areas within settlement areas, contributes to a compact development form. Accordingly, it is a policy of this Plan that local municipalities will plan to achieve the following minimum percentages of all new residential units occurring annually to be developed within the built boundaries of settlement areas by the year 2015 and for each year thereafter:*

*Town of Midland: 40%*

3.5.30 *Development within the built-up areas and designated Greenfield area of settlement areas may be of higher density to achieve the policy directives of this Plan but should be compatible with adjacent residential areas. The local municipalities may explore means to ensure compatibility through such measures as transitional densities, built form and land uses.*

The proposed development conforms to sections noted above under 3.5 of the County of Simcoe Official Plan as it:

- Identifies the Blocks A, B, and C which front onto Balm Beach Road and Penetanguishene Road being identified as Strategic Growth Areas which are appropriate locations for the desired growth in the form of High Density residential dwellings and mixed-use developments.
- Provides approximately 895 dwelling units that will assist in meeting growth/density and intensification targets together with economic opportunities in the form of increasing business areas, would appeal to a range of residents/household sizes and incomes, is on lands for urban uses (ie not designated as agricultural or rural) and can be appropriately serviced with full municipal servicing.
- Provides logical and appropriate development that considers the unique context and desire for mid-rise and mixed used buildings and makes use of existing municipal infrastructure
- Considers the existing features on site and would adopt various recommendations to ensure no negative impact on natural heritage



---

features/functions while also providing for active transportation, trails and open space areas.

- Considers future context of the surrounding area and seeks to provide development that would integrate in the future vision for the Balm Beach and Penetanguishene Road corridors. Efforts to connect with the Adjacent Proposed Development such as 653 Balm Beach Road will be considered and carried out to the furthest extent possible at the detailed design stage

#### **7.3.4 HEALTHY COMMUNITIES AND HOUSING DEVELOPMENT**

- 4.1.2 Accessibility of education, health, human services, culture, and recreation facilities by walking, cycling, or transit is encouraged.*
- 4.1.3 The County encourages the provision of a full range and equitable distribution of publicly accessible built and natural settings for recreation, including parkland, open space, trails, and water-based facilities.*
- 4.1.5 The design of streetscapes, building orientation, and traffic flow should be planned to provide safe pedestrian and cycling access and movement in downtowns, main streets, and other activity areas.*
- 4.1.6 Local municipalities will provide for an appropriate range of housing types and densities required to meet projected needs of current and future residents.*
- 4.1.7 Local municipalities shall make available: sufficient quantity of housing, taking into account demand to improve choice; and, housing development in suitable locations, which offers a good range of public service facilities and proximity to jobs, key services, and infrastructure, recognizing the needs and abilities of all residents.*

The proposed development conforms to sections noted above under 4.1 of the County of Simcoe Official Plan as it:

- Provides integration of parks and community amenities such as trails, which promote active and alternative modes of transportation. Blocks D, E, and F will seek to provide pedestrian connections to future trail networks, open space, and Natural Heritage areas.
- Establishes the framework to supply a range of housing options to the Town of Midland and the surrounding area. These can be seen in Block A, B, and C in which the proposed development provides higher density residential and commercial uses in the form of a mixed-use designation while areas D, E, & F offer medium residential densities that provide development transition and contribute to the range of housing options available to the site.

- 
- Provides mix use residential/commercial development which aids in the opportunity for job creation which will function harmoniously with the proposed residential uses.
  - Provides connections to both Balm Beach Road and Penetanguishene Road which are areas slated for mixed use and higher density.
  - Is within proximity to Huronia Mall and various commercial uses that can adequately service the proposed development.

### **7.3.5 AFFORDABLE HOUSING**

4.3.1 *The development of affordable housing is important to the County and the local municipalities to ensure individual health and long term community vitality. Official plans, zoning, and other bylaws shall be used to facilitate its development. The County will work with local municipalities to: reduce unmet housing need, reduce housing inequality, improve housing quality, and provide for an efficient delivery of affordable housing*

4.3.2 *Local municipalities are encouraged to have regard for Simcoe County's 10-year Affordable Housing and Homelessness Prevention Strategy (2014-2024) when setting targets in their local municipal official plan. This strategy outlines steps for the development and implementation of creative solutions for increasing affordable housing and the range of choices for all residents in Simcoe County.*

The proposed development conforms to sections noted above under 4.3 of the County of Simcoe Official Plan as it provides:

- Higher density housing on county roads, where higher density development is encouraged offering residential market flexibility.
- Potential for the provision of affordable housing options and provides greater opportunities of attainable housing for the Town of Midland.
- The proposed units will assist in meeting the housing targets and reduce housing inequalities.

### **7.3.6 AGGREGATE POTENTIAL**

4.4.4 *In areas adjacent to or in high potential mineral aggregate resource areas as shown on Schedule 5.2.1, development for alternate land uses in accordance with other polices of this Plan may be permitted where: it would not preclude or hinder the establishment of new operations or access to the resources; utilization of the resource is not feasible because of natural physical or existing man-made constraints; or the proposal serves a greater long term public interest; and, provided any issues of public health, public safety and environmental impact are addressed.*

---

This policy framework is similar to that contained in the PPS 2024, reviewed above, and the development conforms with Section 4.4.4 of the County Plan as:

- Only a small portion of the lands, approximately 1.3 ha (6.3% of the site – See Figure 7), contain high potential mineral aggregate resource as per Schedule 5.2.1 which is not economically feasible to extract the resource, and generally falls within an identified secondary plan area which is targeted for strategic growth initiatives.
- The development proposal serves a greater long term public interest in assisting with contributing to a range of housing and land uses at a range of densities in an appropriate location.
- The development does not pose a risk to existing extraction areas, as the distance from active pits and quarries are approximately 400 m from the Subject Lands.
- Issues of public health, safety and environmental impact have been assessed and will continue to be evaluated by the proposed development in support of land uses which will preclude aggregate extraction.

### **7.3.6 Archaeological Potential**

- 4.6.9 Applicants shall provide to the County of Simcoe a copy of the completed Archaeological Assessment reports for heritage resource register purposes.

The proposed development conforms to sections noted above under 4.6 of the County of Simcoe Official Plan as it provides:

- An Archaeological Assessment prepared by Irvin Heritage which indicates the study area has been sufficiently assessed and is free of further archaeological concern, and further that no archaeological resources were discovered.

Based on the review of the applicable policies of the County of Simcoe Official Plan, it is our opinion the development conforms to the Plan as it will direct development to a primary settlement area while ensuring no negative impacts to the identified significant woodland on site, can be serviced in accordance with applicable policy and represents an efficient and compact form of sustainable development. The development would establish the necessary framework for further Planning Act applications to consider and further implement detailed design considerations.

---

## 7.4 TOWN OF MIDLAND OFFICIAL PLAN

The Town of Midland Official Plan was approved by the Town of Midland and came into effect on February 19, 2021, following approval by the County of Simcoe (subject to site specific appeals). This Report reviews conformity of the proposed OPA application with applicable policies set out in the Town's Official Plan. The Town of Midland Official Plan outlines the planning policy framework for growth and development for the Town of Midland to the Year 2031.

The Plan designates the Subject Lands as the following:

- Schedule A – Growth Areas Map: **'Delineated Built Boundary', 'Secondary Plan Area', 'Strategic Growth Area', and 'Greenlands'**
- Schedule B – Urban Structure: **'Mixed Use District', and 'Greenlands'**,
- Schedule C – Land Use: **'Mixed Use Corridor', and 'Greenlands'**
- Schedule D – Active Transportation: **'County Road', and 'Widened Shoulders with Bike Lanes'**,
- Schedule E – Roads: **'County Road'**
- Schedule F – Infrastructure Map: **'Urban Service Area'**
- Schedule G – Source Protection Map: **'WHPA-Q2, WHPA-Q1, WHPA-D'**

### 7.4.1 POPULATION AND EMPLOYMENT FORECASTS

- a) *The Province and Simcoe County have provided population and employment forecasts for the Town of Midland that form the basis for the growth management strategy included in this Plan. The Town of Midland is projected to grow to a **total population of 22,500, with an employment target of 13,800 jobs, by 2031.***
- b) *Notwithstanding that the time horizon for this Plan is to the year 2031, the Town of Midland is expected to continue to grow and evolve well beyond 2031 and, as a result, this Plan does not represent an end state for the Town of Midland, but rather it is to be used as a tool to manage its ongoing growth and development.*

The proposed development conforms to the following as it:

- Provides much needed housing stock and options for the Town of Midland, where the census last reported (2021) a total population of 17,817 people.
- The proposed development has the potential to supply a significant number of residents/population depending on the final unit count/form and small scale jobs/employment opportunities as well.

---

#### **7.4.2 PLANNING FOR GROWTH IN AN URBAN STRUCTURE**

2.2 c) In Midland, the Municipal Boundary coincides with the identified Settlement Area Boundary. As such, the entire Town has been identified as a Settlement Area. In a general sense, this identification means that ongoing development is to be considered throughout the Town, with various levels of priority and permissions for growth within the 2031 planning horizon.

d) Schedule A - Growth Areas, identifies those areas within the Settlement Area/Municipal Boundary that have been identified by Provincial, County and Town planning documents as key elements of the Town with respect to growth management. Each element of the Town has a specified role to play in long-term growth management, as follows:

ii) *Greenlands* – Greenlands consist of the protected natural heritage system and public parks. Together they form a strong character giving element of the Town. These areas are generally not available for urban development at this time

iii) Strategic Growth Areas are identified and, in order of priority, listed below:

*Strategic Growth Areas I* – Strategic Growth Areas I consist of lands within the Delineated Built-up Area which have been identified to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form. These lands are further considered Intensification Areas as part of the Town's Intensification Strategy and identified as Mixed Use District on Schedule B – Urban Structure; and,

*Strategic Growth Areas II* – Strategic Growth Areas II consist of lands outside of the Delineated Built Boundary which have been identified to be the focus for accommodating higher-density mixed uses in a more compact built form. These lands are further identified as Mixed Use District on Schedule B – Urban Structure; and,

iv) *Secondary Plan Areas* – Secondary Plan Areas are lands where a Secondary Plan or Plans must be developed prior to future urban development, to ensure the coordination and comprehensive planning of growth and development opportunities.

2.2e) The planned urban structure identified on Schedule B – Urban Structure forms the basis upon which Midland's future growth is to be focused and accommodated. The growth details for all of the lands within the Town of Midland will be further articulated in this Plan and provided with appropriate land use designations and development policies that will ensure that they achieve their identified planned function and provide for compatible development.

2.2f) The urban structure identified on Schedule B will have a focused Downtown, surrounded by neighbourhoods and employment areas that are connected by corridors which could accommodate mixed use development. The urban structure includes the following identifiable Districts:

ii) *The Neighbourhood Districts* – The Neighbourhood Districts represent Midland's existing and planned residential

---

*neighbourhoods. These neighbourhoods accommodate a full range and mix of housing types.*

*The role of existing neighbourhoods (neighbourhoods within the Delineated Built-up Area) in growth management is modest intensification, which is expected to include the development of Second Units and other forms of compatible redevelopment.*

*The planned residential neighbourhoods that are located outside the Delineated Built Boundary and within the Designated Greenfield Area will accommodate new residential communities with a minimum gross density of 50 persons and jobs combined per hectare. 50 persons and jobs combined per hectare is a target that applies across all Designated Greenfield Areas.*

*New development on full urban services is required for residential growth in the Neighbourhood Districts. New residential development on partial or private services is expected to be limited to minor infilling and minor rounding out of existing development where there are no urban services available or expected.*

*The planning policy framework included in this Plan further subdivides the Neighbourhood Districts into Neighbourhood Residential and Shoreline Residential.*

The proposed development conforms to section 2.2 as it addresses growth in the Town by:

- Considering the context of the *Greenlands* designation on the site and assessing the potential impacts of development on the natural heritage system. It is understood the Plan does not prohibit development within the *Greenland* designation and notes they are generally not available; however, this Report has demonstrated the merits of developing on the lands presently designated as *Greenland* without adversely impacting the natural heritage features.
- Providing compact built form within areas designated as *Mixed-use Districts* which are slated for higher density and compact development as per the Section 2.2d) ii).
- Proposing an amendment to Schedule B - Urban Structure of the Official Plan to have a portion of the lands be designated as *Neighbourhood District* and *Mixed-use District*.
- Providing a transition of density leading to the open space and protected areas to provide appropriate and logical development.
- Maintaining a portion of the *Natural Heritage* designation within areas as denoted in Figure 6.

- 
- Providing a mix of uses that lead to an increase in employment opportunities.

#### **7.4.3 MIX OF USES**

- 3.1.5a) *A mixed-use community that is walkable, with connected public gathering places, where opportunities for social interaction are increased and where commercial and public service facilities can be provided within easy walking and cycling distances, is a key consideration of this Plan.*
- 3.1.5b) *This Plan will accommodate a range and mix of housing types to allow for a range of choice and opportunity for residents to remain in the community for their entire life cycle.*
- 3.1.5c) *Higher density house forms will provide opportunities for housing that is more affordable, and that will contribute to the affordable housing requirements of the County and Town. In addition, senior's housing, long-term care facilities, affordable supportive and affordable accessible housing, and assisted living units will be incorporated into the housing stock within the Delineated Built-up Area and through greenfield development.*

The proposed development conforms to section 3.1.5 as it relates to a range and mix of housing options and uses by:

- Providing compact high density mixed-use development that fronts onto County roads.
- Provides a range in housing options in the form of High and Medium density residential units.
- Provides active transportation through trails and pedestrian networks to other modes of transportation, such as Transit.

#### **7.4.4 HOUSING**

##### **3.2.1 b) Objectives**

- i) *Recognize and consider the housing needs and priorities of all residents when planning for new residential development and redevelopment throughout the Town;*
- ii) *Maintain an appropriate supply of land within the Town in accordance with the policies of this Plan to accommodate residential growth, including opportunities for barrier-free, assisted and/or affordable housing components;*
- iii) *Promote the development and sustainability of an appropriate and adequate mix of housing by fostering a range of types, tenures, unit sizes and affordability which can accommodate the broad needs of residents over time, regardless of age, income level, ability or household type;*

- 
- iv) *Work with the private sector, the non-profit sector, all levels of government, community agencies and other stakeholders in the implementation of the housing policies of this Plan; and,*
  - v) *Facilitate the development of housing that is barrier-free and affordable for low and moderate income households or individuals, as recognized in the County of Simcoe's 10-Year Housing and Homelessness Plan, as amended.*
- 3.2.2a) *The Town shall encourage the provision of an adequate supply and a full range and mix of housing types and tenures to meet the needs of all current and future residents, including affordable housing. To provide housing opportunities, the Town shall maintain a supply of land through residential intensification, redevelopment, and, as necessary, lands designated and available for residential development. This will include a three year supply of land zoned for residential intensification and residential lots/units in registered and draft plan approved subdivisions within the context of the population target to 2031 contained in this Plan.*
- 3.2.2b) *The Town shall maintain servicing capacity within the municipal sewer and water systems to provide a minimum three-year supply of residential units in draft approved and registered plans, or in cases of residential intensification and redevelopment, land appropriately zoned and available for development.*
- 3.2.3b) *The Town shall require:*
- i) *Greater housing diversity by requiring a mix of housing types, sizes and densities in new development and encouraging a mixture of tenures, unit sizes and affordability which will accommodate changes in community needs over time; and,*
  - ii) *Opportunities for increased housing densities and intensification for residential development.*

The proposed development conforms to section 3.2.1, 3.2.2, and 3.2.3 as it addresses supply and range of housing options by:

- Providing an increased supply of housing with various built forms in medium and high density development areas.
- Providing increased densities along Balm Beach Road and Penetanguishene Road in which higher density and activity is expected and currently designated by the Official Plan.
- Providing a stormwater management report prepared by Crozier Engineering, dated August 6<sup>th</sup>, 2025, which indicates the existing municipal system can appropriately accommodate the proposed development.

#### **7.4.5 AFFORDABILITY AND ATTAINABLE HOUSING**



- 
- 3.2.6b) This Plan establishes a Town-wide target for the provision of affordable housing at 10 percent of all new housing units and a minimum of 90 units of assisted housing by 2024. Part of the affordable housing target will be achieved in the form of Second Units.
- 3.2.6c) The following planning strategies may be considered by the Town in an effort to achieve barrier-free, assisted and/or affordable housing objectives: Promote higher density housing forms,
- i) where housing is more affordable due to reduced per unit land costs, within Strategic Growth Areas. Higher density housing forms should include a range of unit sizes;
  - ii) Encourage the development of smaller dwelling units, where housing is considered more affordable due to lower construction costs;
  - iii) Encourage the inclusion of barrier-free, assisted and/or affordable housing units within subdivisions and larger scale developments;
  - iv) Develop educational materials to increase awareness of innovative and non- traditional housing models that make home ownership more affordable;
  - v) Ensure that the provisions of the Zoning By-Law are sufficiently flexible to permit a range of innovative housing types and sizes, including Second Units, accessory dwelling units, garden suites, cohousing, communal housing and life- lease housing;
  - vi) Encourage the creation of residential uses above commercial uses within the Commercial Corridor and Mixed Use Corridor designations;
- 3.2.6d) The following strategies shall be considered by the Town in an effort to incentivize barrier-free, assisted and/or affordable housing:
- i) Consider barrier-free, assisted and/or affordable housing as a priority use for surplus Town-owned land and work with other levels of government to make surplus land available to providers of barrier-free, assisted and/or affordable housing at little or no cost;
  - ii) Provide targeted relief from development, planning, permit and other fees normally charged for projects that provide permanent barrier free, assisted and/or affordable housing;
  - iii) Apply for government grants and/or subsidies, including land dedication, that will reduce overall development costs;
  - iv) Inform the community of government grants available to encourage the creation of Second Units, converted units and accessory units;
  - v) Streamline the approvals process for projects that provide barrier-free, assisted and/or affordable housing; and,
  - vi) Reduce parking requirements and/or parkland dedication requirements for projects that provide barrier-free, assisted and/or affordable housing

---

The proposed development conforms to section 3.2.6 as it pertains to affordable and barrier free housing by:

- Establishing land use designations that promote housing densities to assist with increased affordable housing opportunities.
- The proposed development will accommodate a mix of housing options in the form of medium and high density residential units. Possible attainable housing options include townhouses, and condo units are generally more attainable compared to single and semi-detached dwellings.

#### **7.4.6 NEIGHBOURHOOD DISTRICTS**

4.3.1b) *The objectives of this Plan with respect to Neighbourhood Districts are to:*

- i) *Create, maintain and enhance residential areas, which foster a sense of neighbourhood, character and belonging and to protect these areas from incompatible forms of new development;*
- ii) *Encourage a high standard of community design in existing and future residential development such that the overall image of the community is enhanced and that residential areas present a harmonious integration of housing types;*
- ii) *Require new subdivision and condominium developments to incorporate traditional neighbourhood design elements that respect and reflect the character of the existing community;*
- iv) *Encourage the provision of a broad range of housing styles including accessible, assisted and affordable housing types and tenures, and to consider incentives which would foster such development;*
- vi) *Foster and encourage the development of higher density forms of housing, including a mix of unit sizes, where appropriate community and commercial facilities can be provided; and,*

4.3.2b) *The uses permitted within the Neighbourhood Residential designation identified on Schedule C – Land Use may include:*

- ii) *Low and mid-rise residential;*
- x) *Park and Open Spaces;*

---

4.3.2f) All applications for development within the Neighbourhood Residential designation shall be subject to meeting the definition of compatible development. Key elements of determining compatibility will be neighbourhood context and character, transitions in height and density, massing, setbacks and, to a lesser extent, building materials and architectural character. The Town shall not approve any development that creates an undue, adverse impact on neighbouring residential properties within the Neighbourhood Residential designation.

4.3.2h) Policies for mid-rise residential development include:

- i) Mid-rise residential development may consist of a mix of triplexes, fourplexes, townhouses, street townhouses, apartments and similar multiple dwellings, or a mix of the above;
- ii) Mid-rise residential buildings shall not exceed a height of 6.0 storeys or 21.0 metres, whichever is less; and,
- iii) Mid-rise residential uses may be permitted, by amendment to the Zoning By-law, subject to the following:
  - Consideration must be given to the eventual community structure, desirability and compatibility of the proposed use, including an assessment of the potential impact of such development on adjacent low-rise residential uses;
  - The site should be well sited in terms of amenities such as schools, parks, recreational facilities, shopping, parking, public transportation, active transportation, traffic circulation and other surrounding transportation features;
  - The site should have direct access to Arterial or Collector Roads;

The proposed development conforms with section 4.3 as it relates to the desired designation for *Neighbourhood Districts* by:

- Providing a neighbourhood area that has the ability to facilitate and foster a sense for neighbourhood by integrating passive and active recreation with the surrounding area and creating a mix of housing types in a compact and efficient manner while making use of existing infrastructure.

- 
- Integrating compatible uses such as commercial and residential uses to integrate the proposed development with the future vision along Balm Beach Road.
  - Providing Mid-rise residential uses that provide adequate transition between the proposed *Mixed-use District* and the *Greenlands* designated areas.
  - Provide multi-modal transportation options within the site and provide connections to the Arterial / County roads to direct transportation onto appropriate areas.
  - It is noted that should the applications be approved, further analysis of these policies will be required to demonstrate conformity in consideration of future Planning Act applications (ie ZBA/DPS)

#### **7.4.7 MIXED-USE CORRIDOR**

- 4.4.1a) *The Mixed Use Districts have the potential to accommodate significant growth, in an intensified built form, with mid-rise and high-rise residential buildings and population related employment uses, including community or regionally scaled retail commercial, office and institutional facilities. The Mixed Use Districts also play a crucial role in defining the planned urban structure of the Town, in accommodating growth through intensification and in supporting a successful transit system.*
- 4.4.1b) *The Mixed Use Districts are intended to be flexible and responsive to land use pattern changes and demands and permit a broad range of uses at different scales and intensities depending on the location within the Town's urban structure. An appropriate mix and range of commercial, retail, office, institutional and residential uses at different scales and intensities will be encouraged and supported within the various Mixed Use Districts.*
- 4.4.1c) *With respect to the Mixed Use Districts identified on Schedule B – Urban Structure, the objectives of the Town are to:*
  - i) *Promote the accommodation of substantial anticipated growth in medium and higher density built forms;*
  - ii) *Ensure a significant and diverse supply of designated lands that provide opportunities for a diversified economic base, taking into account the needs of existing and future residents and businesses;*
  - iii) *Ensure that the necessary infrastructure is available to support current and projected growth and development; and,*

- 
- iv) *Require that all development within the Mixed Use Districts is transit- supportive and incorporates high-quality design to support active transportation and a strong public realm, including built form, architectural details, landscaping and signage*

The proposed development conforms to section 4.4.1 as it addresses the objectives of the *Mixed-use Districts* designation by:

- Providing high density mixed use development that will accommodate growth through intensification along county road classifications.
- Provides a diverse supply of employment opportunities to accommodate a growing and competitive economy.
- Promoting an appropriate mix of commercial and residential uses that will aid in providing attractive and efficient use of the Subject Lands that front onto Balm Beach Road & Penetanguishene Road.
- Providing for a revised area for development which has been informed by technical study, including an EIS and eliminates an irregular boundary line to accommodate a more efficient development pattern.

4.4.5a) *Lands within the Mixed-Use Corridor designation function as the connective spine of the Town as well as a destination for the surrounding neighbourhoods. These lands provide a significant opportunity for creating vibrant, pedestrian and transit-oriented places through investment in infrastructure, residential intensification, infill and redevelopment, with particular attention to urban design*

4.4.5b) *Areas within the Mixed-Use Corridor designation have evolved, and will continue to evolve over time. These corridors typically include an array of compatible land uses including retail and service commercial uses, mid-rise and high-rise residential uses, as well as institutional uses. These corridors are expected to accommodate significant intensified development, while maintaining a broad mix of land uses that support investment in transit and the achievement of a complete community.*

4.4.5c) *Buildings and sites throughout the Mixed-Use Corridor designation are encouraged to accommodate an array of uses. This mixture of uses is encouraged not just within the designation in general, but also on individual development sites, and within individual buildings. Uses within stand-alone buildings are also permitted, unless specified*

---

*otherwise within the policies of this Plan or the implementing Zoning Bylaw*

The proposed development conforms to section 4.4.5 a) to c) as it addresses the objectives of the *Mixed-use District* designation by:

- Providing the framework for residential intensification that aids in the vibrant place that is multi-modal oriented with connections to transit and pedestrian networks.
- Providing the framework for high density mixed-use building in an area that is appropriate for intensification.
- Generally, the proposal seeks to enlarge or round out these existing designated areas to accommodate a more functional development pattern.

#### **7.4.8 GREENLANDS**

4.5.1b) *With respect to the Greenlands, it is the objective of this Plan to:*

- Maintain biodiversity and provide for the long-term sustainability and viability of the ecosystem by only approving developments that are consistent with the natural heritage policies of the Provincial Policy Statement and the County of Simcoe Official Plan and which contribute to the Town's Greenlands;*
- Provide a range of leisure, recreational and cultural opportunities that are fully interconnected with the Town's ecosystem and active transportation network;*
- Maintain and enhance an appropriate municipal public open space system in terms of interconnectivity, land areas, uses and facilities;*
- Protect significant wetlands, significant woodlands, significant valleylands, significant wildlife habitat, significant areas of natural and scientific interest, significant coastal wetlands, fish habitat and the habitat of endangered species and threatened species located within the Town;*
- Encourage the joint use of community open spaces and institutional uses; and,*
- Maintain and extend a multi-level recreational trails system for local and regional interests.*

4.5.3b) *The Natural Heritage designation is intended to:*

- 
- i) *Protect significant wetlands, woodlands, valleylands, wildlife habitat, areas of natural and scientific interest, coastal wetlands, fish habitat and the habitat of endangered species and threatened species located within the Town;*
  - ii) *Maintain ecosystem biodiversity and provide for the long-term sustainability and viability of the natural heritage system by only approving developments that are compatible with natural heritage features and ecological and hydrologic functions;*
  - iii) *Encourage and promote the use of a variety of resource management approaches and techniques to protect, restore and enhance the natural heritage system for the long-term; and,*
  - iv) *Ensure that any development proposed within, adjacent to, or in proximity to the Natural Heritage designation is adequately studied through the Town's Environmental Impact Study (EIS) process as well as a Species at Risk Screening/Evaluation, as required.*

The proposed development conforms to the policies for the land use designation *Natural Heritage* by:

- *Providing an EIS prepared by Cambium Environmental, dated August 15<sup>th</sup>, 2025, to support the redesignation of a portion of the Subject Lands from Natural Heritage to Neighbourhoods which demonstrates no negative impacts will occur while also preserving, maintain and protecting portions of the feature and accommodating trails/recreational features which would be publicly accessible.*
- *Ensuring that the proposed development occurs in a manner that ultimately maintains and preserves areas of natural heritage for long term use and enjoyment.*

4.5.3.1b) *Adjacent lands are not identified on the Schedules of this Plan. Adjacent lands are defined as those lands which abut or are contiguous to the Natural Heritage designation identified on Schedule C – Land Use and as defined in the Ministry of Natural Resources and Forestry Natural Heritage Reference Manual by type of natural heritage feature, as follows:*

- i) *Significant woodlands: 120 m*

---

4.5.3.4e) *Significant changes to the boundaries of the Natural Heritage designation may be considered by the Town through an Environmental Impact Study, submitted in support of an Official Plan Amendment application. Such an application shall show that:*

i) *There is no negative impact on key natural heritage features and their ecological and hydrologic functions.*

4.5.3.5f) *Where an Official Plan Amendment that would result in the redesignation of land from Natural Heritage is approved, and the Official Plan Amendment does not involve the redesignation of any lands adjacent to the lands to be removed from the Natural Heritage designation, the adjacent land use designation as identified on Schedule C – Land Use, should apply.*

The proposed development conforms to section 4.5.3.4 & 4.5.3.5 as it addresses the policies for new development in relation to *Natural Heritage* designated areas by:

- Providing buffer distance from the southern *Natural Heritage* designated area as recommended in the *Natural Heritage Evaluation*, which indicates the proposed buffer distance is adequate in maintaining and protecting the remaining/abutting woodlot.
- Providing an EIS prepared by Cambium Environmental, dated August 15<sup>th</sup>, 2025, which indicates that with appropriate mitigation measures the proposed development can appropriately be accommodated and will not adversely affect the adjacent natural heritage system.
- Identifying mitigation/recommendations to ensure the long term preservation and sustainability of the retained natural heritage feature.
- Proposing land use designations which are either currently adjacent the *Natural Heritage* designation or the neighbourhood designation to provide a suitable transition and buffer to/from the *Natural Heritage* designation.

#### **7.4.9           TRANSPORTATION**

*Upon review of the various overarching Transportation policies of the Official Plan under Section 5.0, and in consideration of the nature of the proposed development to establish the necessary land use designations to support future development applications, it is our opinion the proposal conforms with the applicable policies under Section 5 as follows, with an understanding that future detailed design would also require conformity with these policies at a later date should the application be approved:*



- 
- Facilitating areas to provide a multi-use trail that will aid in integrating natural heritage features with the proposed development and in consideration of all users.
  - Ensuring that the multi-use trail network are designed with consideration of all users.
  - The conceptual road and trail network will provide connections in the form of active and vehicular transportation onto adjacent roads to ensure efficient transportation connections are provided.
  - Concentrating higher density development on Balm Beach Road and Penetanguishene Road which can connect to various transit stops in Huronia Mall and surrounding communities.
  - Considers and anticipated future roads and connections to be constructed in accordance with applicable standards with the aim of creating safe traffic flows.
  - Providing a Traffic Impact Study prepared by JD Engineering, dated August 6<sup>th</sup>, 2025, which outlines and considers the current and potential traffic in the surrounding area and identifies the proposed development will not cause any operational issues and will not add significant delay or congestion to the local roadway network.

#### **7.4.10      *SERVICING***

6.2.1a) *Development of municipal infrastructure projects will be:*

- i) *Coordinated and phased in a manner which is efficient, cost effective, and minimizes disruption;*
- ii) *Prioritized where investments support intensification;*
- iii) *Supported by infrastructure master plans, asset management plans, community energy plans, watershed planning, and other relevant studies, where appropriate and available;*
- iv) *Considered in the context of an assessment of infrastructure risks and vulnerabilities, including those caused by the impacts of climate change, and potential mitigative strategies; and,*
- v) *Undertaken in accordance with the Environmental Assessment Act, and the appropriate Class EA requirements*

- 
- 6.2.2a) All development within the Town shall be provided with municipal water, sanitary sewers and a storm water drainage system, unless otherwise specifically exempted by the policies of this Plan.
- 6.2.2c) The cost of providing services to facilitate development shall be borne by the landowner. However, the Town may utilize its capital infrastructure programs and/or the provisions of the Municipal Act to extend or provide municipal infrastructure where it supports the growth management and economic development objectives of this Plan and where Council deems it in the best interest of the Town to do so.
- 6.2.3a) Full municipal services are the preferred form of servicing for new development and redevelopment. The priority for new urban development is to be focused within the Delineated Built-up Area, followed by the Urban Areas.
- 6.2.3d) Before the approval of an application for new development, infill development, intensification or the redevelopment of sites and buildings, the Town must be satisfied that adequate services are available or can be efficiently and economically provided to support the proposal. Where adequate services do not exist, the Town may use Holding provisions in the Zoning By-law to regulate the timing of development.
- 6.3.2m) All new development, including changes in land use, will be required to demonstrate conformity with the Local Source Protection Plan and this Plan. Additionally, any planning application for non-residential uses that is submitted on lands within WHPA- A to WHPA-E must include a Notice from the Risk Management Official as part of a complete application.
- 6.3.2p) Major development applications within Significant Groundwater Recharge Areas must be assessed to ensure that groundwater recharge is not detrimentally affected through impervious surfaces and pre-development recharge rates are maintained.
- 6.4.2a) New development will be responsible for the installation of all necessary sanitary sewer services, which will meet the Town's standards and specifications. Sanitary sewer services shall be designed, constructed and maintained to:
- a) Provide adequate service to the proposed development;
  - b) Accommodate full development of the drainage area;
  - c) gravity flow wherever possible, to avoid the need for pumping stations;

- 
- d) *Protect the natural characteristics of the landscapes in which they are located; and,*
  - e) *Provide for sufficient depth and capacity to serve those areas which may ultimately be connected.*

The proposed development conforms to the above noted policies by:

- Providing Functional Servicing and Stormwater Management Reports prepared by C.F Crozier & Associates Inc. dated, August 6<sup>th</sup>, 2025, which identifies the conceptual locations and design of all proposed servicing works and connections to municipal sanitary sewer services, along with preliminary stormwater management details. It is noted that further detailed design work will be required in order to demonstrate further conformity with these policies as the project advances.
- Providing an EIS prepared by Cambium Inc., which outlines the impact and mitigation strategies of the proposed works in relation to the adjacent woodlot.
- It is our understanding that based on the nature of the proposed application to establish land use designations to facilitate future development applications, and provided that the site will be serviced with full municipal services and subject to a more fulsome review of subsequent detailed design matters, that the proposal conforms to the Local Source Water Protection Plan. This will be further assessed based on more specific development plans to demonstrate conformity as part of future Planning Act applications. No physical on site activities would be permitted if the application is approved prior to subsequent approvals being granted.
- Providing connections to existing sanitary sewer services that meet the standards of the Town of Midland including potential servicing connections to abutting lands.

6.5.2a) *The objectives of this Plan with respect to storm water management are to:*

- i) *Provide provisional guidance for the choice of best storm water management practices in order to control flooding, erosion, sedimentation and water quality in any natural or human-made waterway;*
- ii) *Ensure that storm water will be considered as a resource, not a waste product and to ensure that storm water management strategies will be designed and implemented to replicate the existing hydrologic cycle where feasible;*

- 
- iii) *Employ appropriate environmental management policies considering both the upstream and downstream characteristics of the watershed, while encouraging the appropriate integration of natural waterways, ponds and valleys, to enhance and develop functional corridors for wildlife habitat, open space and parkland systems;*
  - iv) *Protect and enhance the water quality, environmental, aesthetic and recreational potential of the waterways and water bodies within and in proximity to the Town;*
  - v) *Ensure that land dedications for storm water facilities shall not replace, substitute, or be included in the calculations of required park land or other public space land dedications;*
  - vi) *Strive to maintain groundwater quality and promote groundwater recharge by means of runoff retention, detention ponds and/or other low impact development (LID) methods; and,*
  - vii) *Control the flow, improve surface drainage quality and minimize the impact of new development on local and area wide drainage patterns. The impact from development shall be appropriately controlled, especially during construction. Post development peak flows should equal predevelopment levels and a suitable method of handling surface runoff shall be developed as an aspect of the approval process.*
- 6.5.3b) *No Official Plan Amendment, Zoning By-law Amendment or Plan of Subdivision shall be approved if the proposed development would have a significant adverse impact on surface drainage.*
- 6.5.5a) *All storm water management systems and facilities shall be designed by a Professional Engineer, in consultation with a landscape architect and ecologist, to the satisfaction of the Town, in consultation with the Severn Sound Environmental Association and any other agency having jurisdiction.*
- 6.5.5b) *All new storm water management systems shall be designed using the principles of low impact development (LID), which is an approach to managing storm water by infiltrating it in the ground where it is generated using vegetation or porous surfaces, or by capturing it for later reuse. LID includes the use of:*
- i) *Infiltration systems, including bioretention cells, or rain gardens;*
  - ii) *Vegetated swales;*

- 
- iii) *Permeable pavement, including pervious concrete, porous asphalt, interlocking concrete pavers and grid pavers;*
  - iv) *Green roofs;*
  - v) *Rainwater harvesting into a rain barrel or a cistern;*
  - vi) *Downspout disconnection; and,*
  - vii) *Tree planting.*

The proposed development conforms to the policies in section 6.5 to the extent possible at this stage as it addresses the policies to ensure efficient stormwater management occurs by:

- Providing a Stormwater Management Report prepared by a licensed Engineer (in consultation with Cambium Inc) which has reviewed the site conditions and characteristics and confirms the site can be serviced in accordance with applicable policies, and noting the specifics of the design would be confirmed at detailed design stage.

#### **7.4.11        *SECONDARY PLAN***

- 7.2.4a) *The Urban Areas outside of the Delineated Built Boundary are lands which have been determined to be significant locations for future urban growth. It is intended that prior to future growth in these areas, a Secondary Plan, or Plans, are to be developed to coordinate and set out growth and development opportunities in a comprehensive manner. Until such a plan is completed and adopted, development and redevelopment should generally be restricted and the division of land which might interfere with the efficient and proper planning of the area should not be permitted.*

The proposed development seeks relief from the requirement of the Secondary Plan being prepared prior to development occurring, however it is important to note that only a small portion of the Subject Lands are located within the Secondary Plan Area fronting Highway 93. The intent of the proposed development is to achieve a similar outcome as a secondary plan by establishing a land use policy framework over the entire Subject Lands. This will be achieved in a comprehensive manner that will ensure appropriate and orderly development, all at the cost of the developer and on an expedited timeframe than what otherwise may be achievable for the broader secondary plan. Further it is noted that the policy provides language such as “intended” and “generally” when

---

referring to timing of future growth and restrictions on development. More specifically, the policy framework notes that it is intended that a secondary plan will be developed in these areas, rather than an outright requirement. The policy further indicates that development should generally be restricted until a (secondary) plan is completed but not that development is restricted. It is our interpretation that this level of flexibility is intentional, recognizing there may be unique development proposals that could proceed in the absence of the secondary plan without hindering the completion of the secondary plan. It is our opinion the proposed development should be considered at this time and prior to the completion of the secondary plan for reasons noted above. Notwithstanding, the proposed development seeks relief from this requirement in the Draft OPA. Based on the above review of policies of the Town of Midland Official Plan, it is our opinion the proposed development conforms to the applicable policies and represents good planning. The intent of this OPA is to establish the requisite policy framework and land use designations to accommodate the continued refinement of the concept plan, including built forms, lot fabrics, unit counts, building heights etc. and it is anticipated this will include a Zoning Bylaw Amendment and Draft Plan of Subdivision. These subsequent applications will also require a review of applicable planning policies to demonstrate conformity and consistency as required.

Subject to the approval of this application, the applicant intends to initiate preparation of detailed design and Planning Act applications to further advance the development of these lands for Town consideration.

---

## 8.0 CONCLUSION

This Report provides professional planning justification for the proposed Official Plan Amendment which is intended to facilitate and support the future development of the site through additional Planning Act applications. The OPA has been evaluated against relevant planning policy, including:

- **Planning Act**
- **Provincial Planning Statement (PPS)**
- **County of Simcoe Official Plan**
- **Town of Midland Official Plan**

The Subject Lands have frontage on both Balm Beach Road and Penetanguishene Road, both of which are *County Roads*, and are located partially within identified *Strategic Growth Areas* in the Town of Midland. The lands are partially designated as *Mixed-Use Districts*, with the remainder falling within the *Greenlands* designation. Accordingly, the proposed OPA seeks to establish a change in land use, transitioning from areas of higher-density mixed-use development along the *County Roads*, to medium-density residential areas, and ultimately to portions of the retained *Greenlands*.

The existing and anticipated future context of the Subject Lands is a critical consideration in support of the proposed development, particularly given the recent MZO request immediately west, inclusion of portions of the lands within strategic growth areas and existing Town owned lands which were intended for an affordable housing development. The long-term planning vision, as articulated in the Town of Midland Official Plan and supported by current development applications in the area, identifies this location as a target for accommodating future growth and intensification. Lands to the north and west are similarly subject to intensification initiatives through Secondary Plans or active development proposals. As such, the proposed development is designed to contribute appropriately to this broader growth strategy and is compatible with these development initiatives.

This report takes into account the unique characteristics of the Subject Lands and their potential to accommodate growth in a strategic manner that is compatible

---

with the surrounding context. As noted, the proposal does not adversely impact the Natural Heritage features and contributes to a complete community while having the potential to alleviate pressure for intensification within established areas. In support of this, the application is accompanied by a comprehensive set of technical studies that evaluate the suitability and functional integration of the proposed development.

In conclusion, it is our professional planning opinion that the proposed Official Plan Amendment is consistent with or conforms to the applicable policy frameworks at the provincial, county, and municipal levels, is in the public interest and constitutes good land use planning.

Respectfully submitted,

**Innovative Planning Solutions**

A handwritten signature in black ink, appearing to read "Greg Barker".

Greg Barker, B.A.A.  
**Partner**

A handwritten signature in blue ink, appearing to read "Nick Skerratt".

Nick Skerratt,  
**Senior Planner**

A handwritten signature in black ink, appearing to read "Ray Budiwarman".

Ray Budiwarman, BES.  
**Intermediate Planner**



## **APPENDICES**

## **APPENDIX 1: Draft OPA Schedule & Text**

**AMENDMENT NO. XX  
TO THE OFFICIAL PLAN OF THE  
TOWN OF MIDLAND**

**TO THE OFFICIAL PLAN OF THE  
TOWN OF MIDLAND**

The attached explanatory text and schedules constituting Amendment No. XX to the Official Plan of the Town of Midland, was prepared for and recommended to the Council of the Corporation of the Town of Midland.

This amendment to the Official Plan of the Town of Midland was adopted by the Council of the Corporation of the Town of Midland in accordance with Section 17 and 22 of the Planning Act, R.S.O. 1990 c. P. 13, as amended, by By-law No. 2025-XXX passed on the XX day of XXX, 2025.

Bill Gordon, Mayor

Karen Desroches, Clerk

**OFFICIAL PLAN AMENDMENT  
Amendment No. XX  
TO THE OFFICIAL PLAN OF THE  
TOWN OF MIDLAND**

**Part 1 – The Preamble**

**1.1 TITLE**

This Amendment, when approved by the County of Simcoe, shall be known as Amendment No. XX to the Official Plan of the Town of Midland.

**1.2 COMPONENTS**

This Amendment consists of the schedules as outlined below in Part 2 titled, 'The Amendment', Subsection 2.2. The preamble does not constitute part of the actual Amendment but is included for convenience purposes.

**1.3 PURPOSE OF AMENDMENT**

The purpose of this Official Plan Amendment is to re-designate a portion of the Subject Lands (the "Subject Area") from 'Natural Heritage' designation to the 'Mixed-Use District' and 'Neighbourhood Residential' designations according to Schedule C-Land Use, to re-designate the Subject Area from the 'Greenlands' designation to the 'Mixed Use Districts' and the 'Neighbourhood Districts' designation according to Schedule B-Urban Structure, and to remove a portion of the Subject Area from the 'Greenlands' according to Schedule A-Growth Areas. As well as add to section 7.2.4 'Secondary Plans' which would allow the portion of the lands within the Secondary Plan to proceed with development without completion of the Secondary Plan.

**1.4 LOCATION**

The Subject Lands are municipally addressed as 659 Balm Beach Road, 681 Balm Beach Road, and 9050 County Road 93 and are legally described as Part of the North Half of Lot 104 Concession 1 W.P.R, in the Town of Midland, County of Simcoe. The Subject Lands include vacant lands, with the area fronting Balm Beach Road which contains a commercial building used as a billiards hall, and a Single Detached Dwelling which fronts onto County Road 93.

**1.5 BASIS OF THE AMENDMENT**

This Amendment to the Official Plan of the Town of Midland affects the Natural Heritage designation with respect to the Subject Area.

This Amendment would re-designate the Subject Area from the 'Natural Heritage' designation to the 'Mixed-Use District' and 'Neighbourhood Residential' designations to facilitate development on the Subject Lands. Any portions of the lands that are to remain undeveloped will retain the 'Natural Heritage' and 'Greenlands' designation. Any developed portions will utilize the 'Mixed-Use District' and 'Neighbourhood Residential' designation under Schedule C – Land Use, 'Mixed Use Districts' and 'Neighbourhood Districts' designation under Schedule B – Urban Structure, will be removed from the 'Greenlands' designation under Schedule A – Growth Areas.

## **PART 2 – The AMENDMENT**

### **2.1 PREAMBLE**

The amendment consisting of the schedules referred to in Subsection 2.2 below constitutes Amendment No. XX to the Official Plan of the Town of Midland.

### **2.2 DETAILS OF THE ACTUAL AMENDMENT**

#### **PART A)**

That Schedule “A” titled Growth Area of the Official Plan of the Town of Midland is hereby amended, in part, by removing the subject lands from the Greenlands designation, as shown more particularly on Schedule ‘A’ affixed hereto.

#### **PART B)**

That Schedule “B” titled Urban Structure of the Official Plan of the Town of Midland is hereby amended, in part, by re-designating the subject lands from the Greenlands designation to Mixed Use Districts and Neighbourhood Districts designation, as shown more particularly on Schedule ‘B’ affixed hereto.

#### **PART C)**

That Schedule “C” titled Land Use of the Official Plan of the Town of Midland is hereby amended, in part, by re-designating the Subject Area from the Natural Heritage designation to the Commercial Corridor and Open Space designations, as shown more particularly on Schedule ‘C’ affixed hereto.

#### **PART D)**

That Section 7.2.4 titled Secondary Plans of the Official Plan of the Town of Midland is hereby amended, in part, by adding section 7.2.4 d) which details the following:

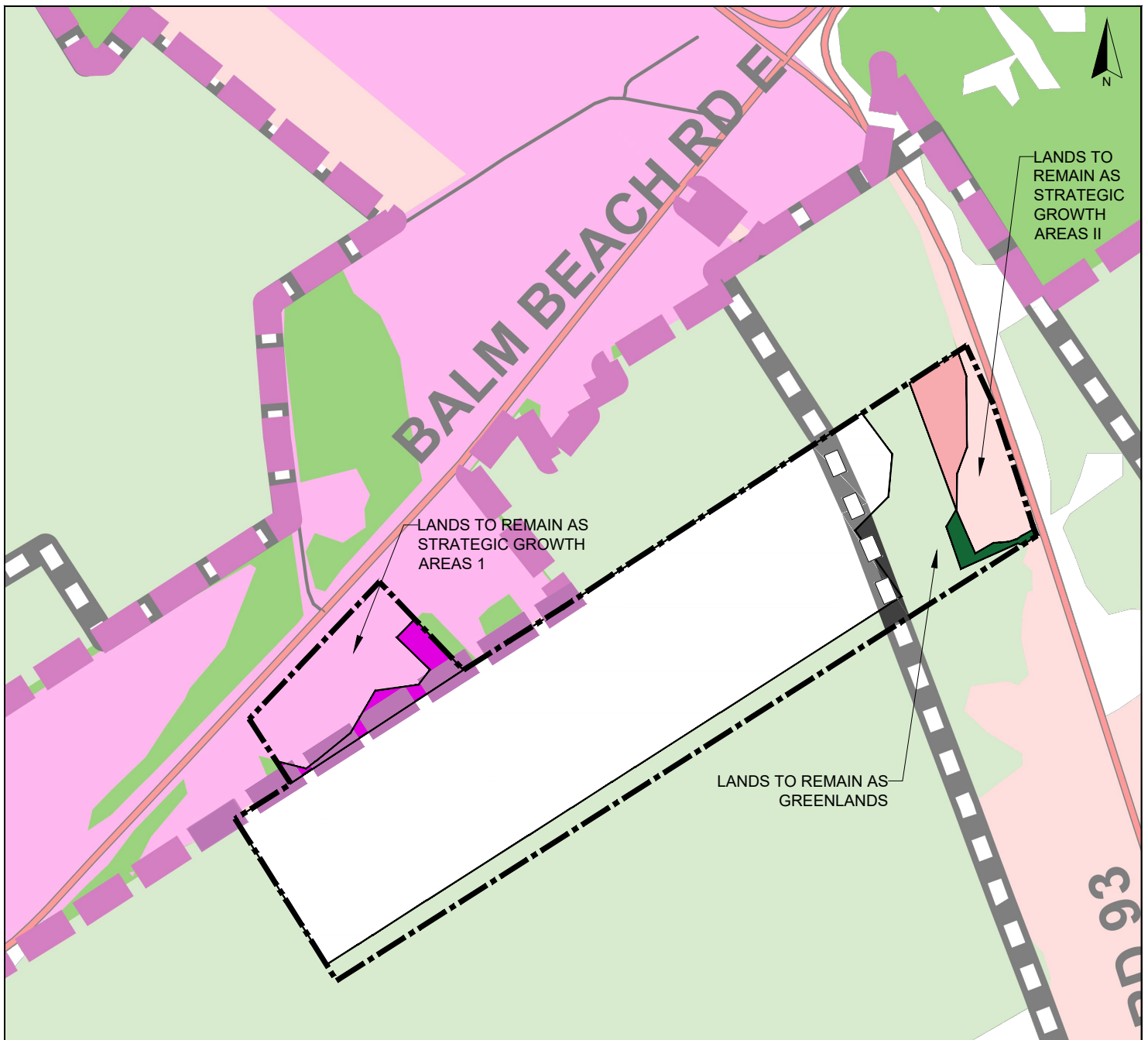
“The properties at 9050 County Road 93 and a portion of the lands 681 Balm Beach that included in the County Road 93 South Secondary Plan area would not be subject to Section 7.4.2 b). Therefore the requirement of this Plan for a Secondary Plan study to be complete would not be applicable and the lands may be developed.”

### **2.3 IMPLEMENTATION**

Amendment No. XX to the Official Plan of the Town of Midland will be implemented by an amendment to the Town of Midland Zoning By-law No. XXX, as amended

## **2.4 INTERPRETATION**

The provisions of the Official Plan of the Town of Midland, as amended from time to time, regarding the interpretation of that Plan, shall apply to this Amendment.



#### LEGEND

-  Subject Site
-  Lands to be re-designated from 'Greenlands' to 'Municipal Boundary / Settlement Area Boundary' designation
-  Lands to be re-designated from 'Greenlands' to 'Strategic Growth Area I' designation
-  Lands to be re-designated from 'Greenlands' to 'Strategic Growth Area II' designation
-  Lands to be re-designated from 'Strategic Growth Area II' to 'Greenlands' designation
-  Delineated Built Boundary
-  Secondary Plan Area

## SCHEDULE "A" OFFICIAL PLAN AMENDMENT

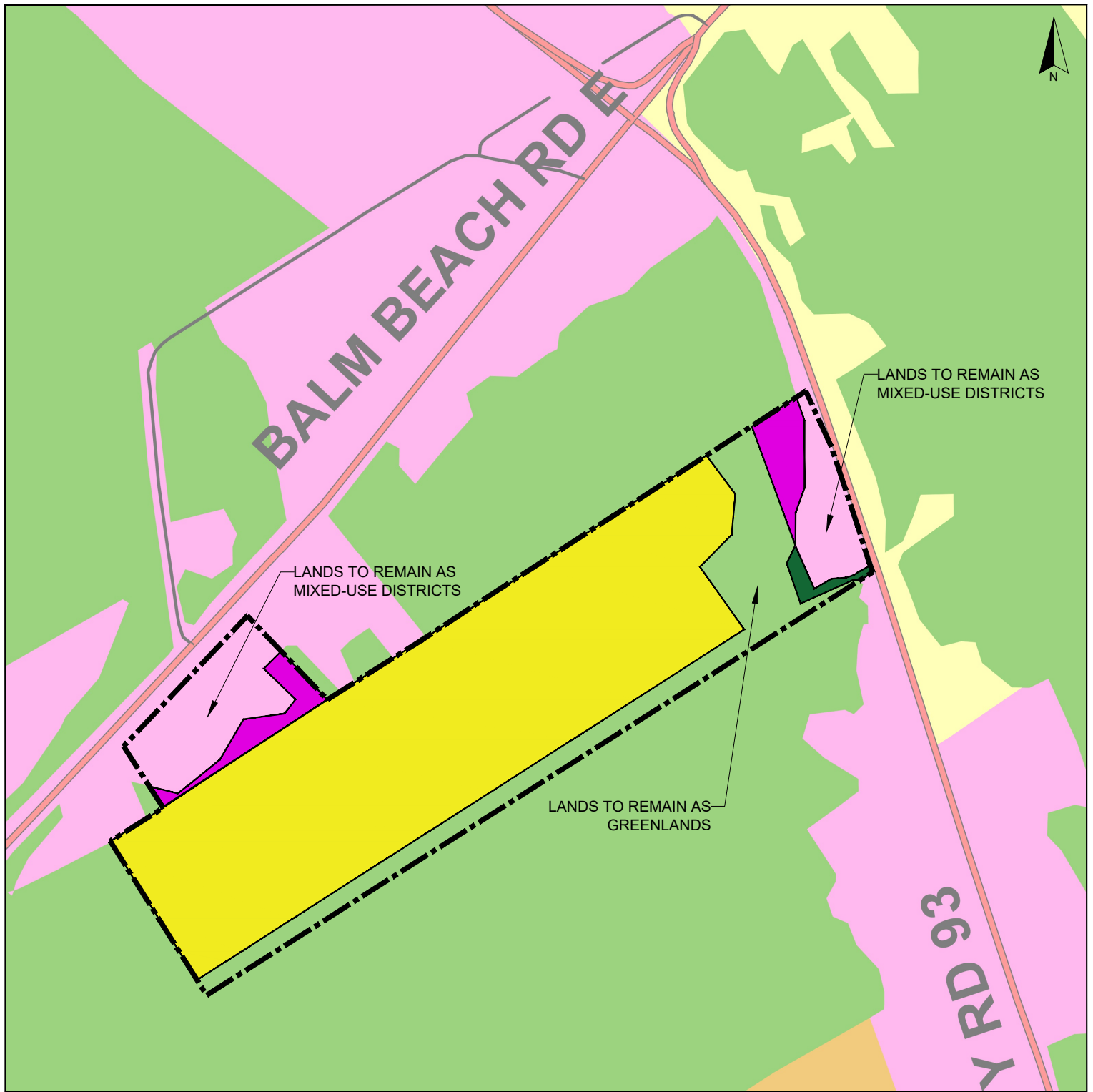
659 BALM BEACH ROAD,  
TOWN OF MIDLAND

Scale  
0 50 100 150m

Source: Town of Midland, Official Plan Schedule A, Growth Areas, Sept. 24, 2025  
Note: Information shown is approximate and subject to change.

**IPS** INNOVATIVE PLANNING SOLUTIONS  
PLANNERS • PROJECT MANAGERS • LAND DEVELOPMENT  
887 HELLAWAY ROAD, UNIT 8, BARRIE, ON L4N 8B7 Tel: 705-612-5281  
2865 STEELES AVE. W. SUITE 200W, VAUGHAN, ON L4A 4G5 Tel: 905-261-7325  
info@innovativeplanning.com / www.innovativeplanning.com

Date: August 12, 2025	Drawn By: A.S.
File: 17 - 728	Checked: N.S.



#### LEGEND



Subject Site



Lands to be re-designated from 'Greenlands' to 'Neighbourhood District' designation



Lands to be re-designated from 'Greenlands' to 'Mixed-Use Districts' designation



Lands to be re-designated from 'Mixed-Use Districts' to 'Greenlands' designation

## SCHEDULE "B" OFFICIAL PLAN AMENDMENT

659 BALM BEACH ROAD,  
TOWN OF MIDLAND

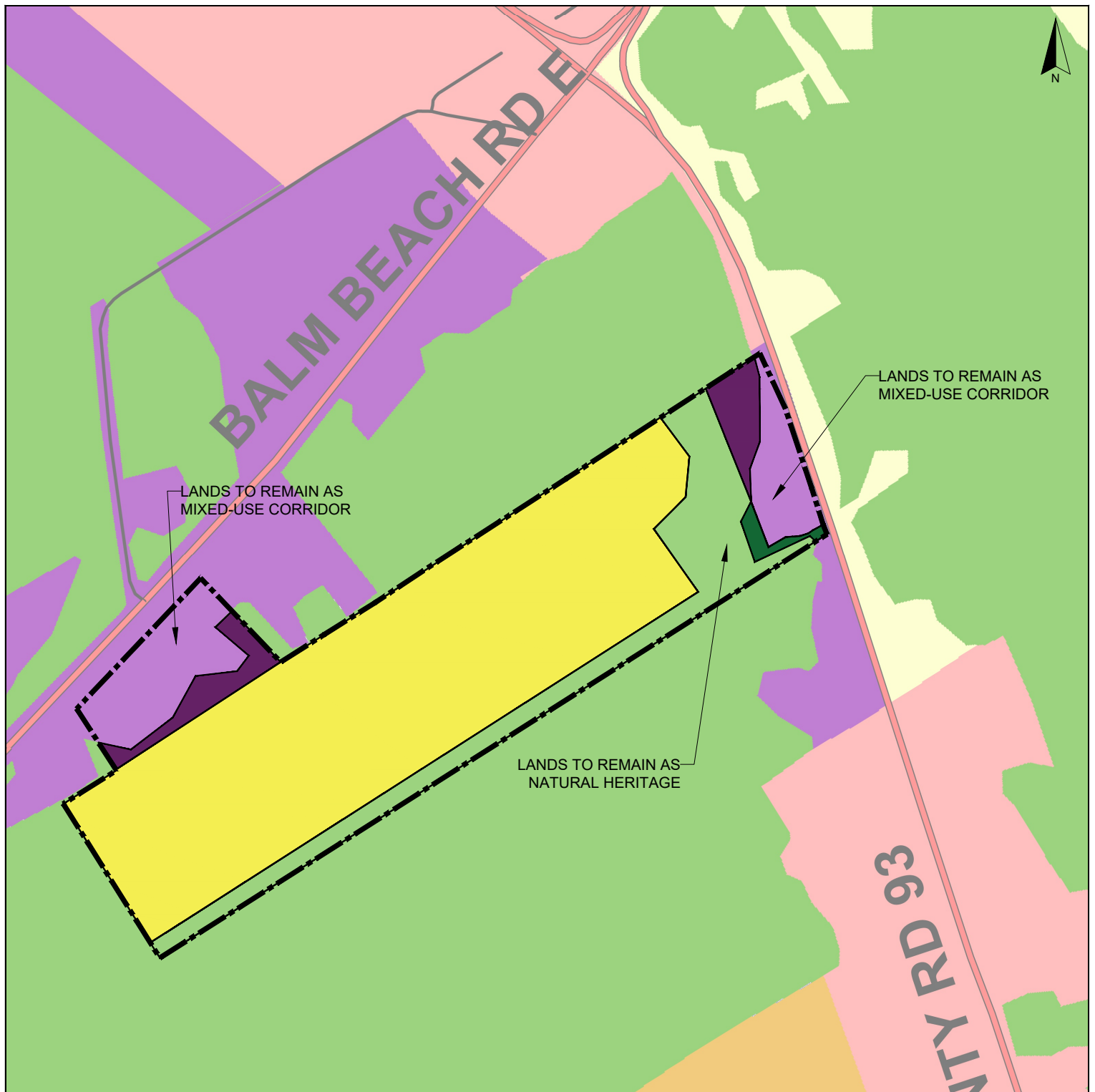


Source: Town of Midland, Official Plan Schedule B Urban Structure, Sept. 24, 2024  
Note: Information shown is approximate and subject to change.

**IPS** INNOVATIVE PLANNING SOLUTIONS  
PLANNERS • PROJECT MANAGERS • LAND DEVELOPMENT  
807 WILSON ROAD, UNIT 8, MARKHAM, ON L3R 9V7 Tel: 905-477-1281  
3800 STEELES AVE. W. SUITE 200W, VAUGHAN, ON L4L 4G8 Tel: 905-291-7525  
info@innovativeips.com / www.innovativeips.com

Date: August 12, 2025	Drawn By: A.S.
File: 17 - 728	Checked: N.S.





#### LEGEND



Subject Site



Lands to be re-designated from 'Natural Heritage' to 'Neighbourhood Residential' designation



Lands to be re-designated from 'Natural Heritage' to 'Mixed-Use Corridor' designation



Lands to be re-designated from 'Mixed-Use Corridor' to 'Natural Heritage' designation

## SCHEDULE "C" OFFICIAL PLAN AMENDMENT

659 BALM BEACH ROAD,  
TOWN OF MIDLAND



Source: Town of Midland, Official Plan Schedule C, Land Use, June 17, 2025  
Note: Information shown is approximate and subject to change.

**IPS** INNOVATIVE PLANNING SOLUTIONS  
PLANNERS • PROJECT MANAGERS • LAND DEVELOPMENT  
847 HESLARD ROAD, UNIT 8, MARKHAM, ON L3R 0B7 Tel: 705-512-1281  
3600 STEELES AVE. W. SUITE 200W, VAUGHAN, ON L4L 4G9 Tel: 905-291-7125  
info@innovativeips.com / www.innovativeips.com

Date: August 12, 2025	Drawn By: A.S.
File: 17 - 728	Checked: N.S.