

January 31, 2025

MGP File: 21-2952

Mayor and Council
c/o Office of the City Clerk
26 Francis Street,
P.O. Box 9000,
Lindsay ON K9V 5R9

Vie email: clerks@kawarthalakes.ca

**RE: February 4th, 2025, Committee of the Whole Meeting – Report PLAN2025-012,
Growth Management Strategy Update
Comments on behalf of Flato Developments Inc.**

This letter is submitted on behalf of Flato Developments Inc. (“Flato”), to provide comment on the Growth Management Strategy, 2025 (“GMS”) that is being brought for endorsement during the February 4th, 2025, Committee of the Whole (“COW”) Meeting. Flato **requests that Council direct its staff to update the GMS to reflect the phasing plan and comments provided in the attached letter dated November 4th, 2024, prior to endorsing the GMS.**

Flato and its consulting team have made numerous deputations and submissions to City Council and staff outlining its concerns with the GMS, in particular with respect to phasing of Flato’s lands which are subject to an approved MZO for urban uses. Based on our initial review of the new GMS materials being brought forward for the February 4th COW meeting, **our concerns**, as outlined in the November 4th, 2024, letter, **have not been addressed or integrated into the proposed GMS.**

As discussed in the submitted letter, the current GMS identifies most of Flato’s MZO Lands for development in Phase 2 (2031-2041) and Phase 3 (Post 2041). It is our professional planning opinion that the current proposed GMS does not conform to the relevant planning policy. The attached, and previously submitted, comment letter provides a recommended altered GMS phasing plan that supports the Provincial Planning Statement, 2024 policies, has been developed in unison with a Concept Plan that represents good planning, provides the necessary near future development to support the City’s 2031 housing pledge, and provides a logical timeline capable of developing lands that are ready for near term development.

We had also requested in our letter and separately to staff that the background data and information that was used in preparation of the GMS be provided and that we be provided an opportunity to meet with the City’s GMS consultants for further analysis and this was never provided.

Given the short time frame provided to review the substantial amount of information released on the February 4th, 2025, agenda, we are continuing to review these materials and reserve the right to provide further detailed comments in the future.

Yours very truly,

Malone Given Parsons Ltd.



Matthew Cory, MCIP, RPP, PLE, PMP (HE/HIM)

Principal, Planner, Land Economist, Project Manager

mcory@mgp.ca

1.905.513.0170 x116

cc. Nazy Majidi, VP of Development and Legal Counsel, Flato Developments Inc.
Katarzyna Sliwa, partner, Dentons LLP
Isaiah Banach, counsel, Dentons LLP
Jessica Jakubowski, associate, Dentons LLP

November 4th, 2024

MGP File: 21-2952

Mayor and Council
c/o Office of the City Clerk
26 Francis Street,
P.O. Box 9000,
Lindsay ON, K9V 4R5

via email: clerks@kawarthalakes.ca

RE: November 5th, 2024, Committee of the Whole Meeting – Growth Management Strategy Update

1.0 Introduction

This letter is submitted on behalf of Flato Developments Inc (“Flato”), to provide comments on the Growth Management Strategy (“GMS”) and requests that the City update the GMS to reflect the phasing plan prepared by Flato that is attached in Section 5.1 to this letter (“East Lindsay Phasing Plan”).

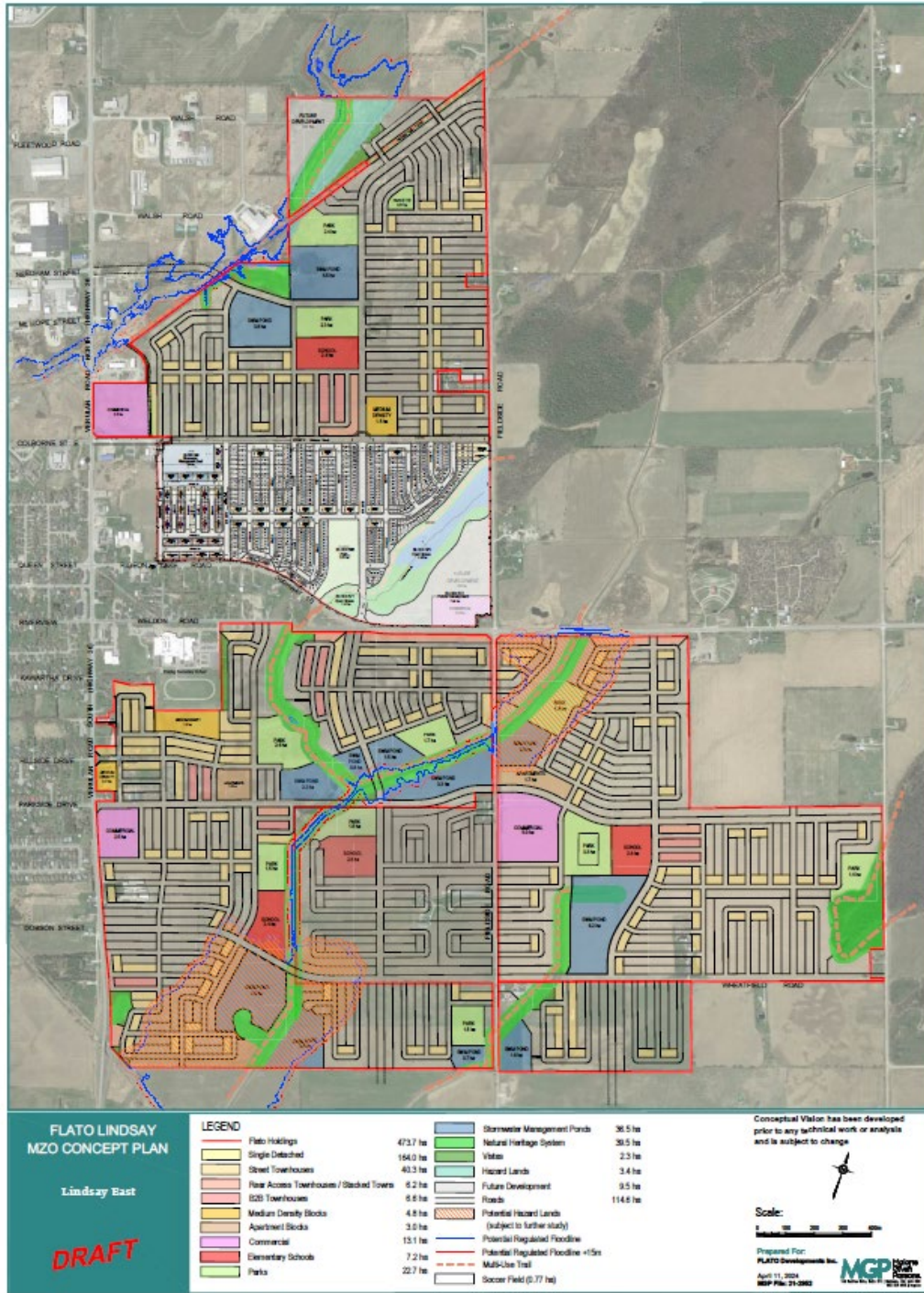
Flato owns lands east of Highway 36 (Verulam Road), north of the Trans Canada Trail and west of Fieldside Road, in the community of Lindsay, in the City of Kawartha Lakes (“East Lindsay MZO Lands”). On October 4th, 2024, the City of Kawartha Lakes released the GMS Project Update Memorandum (“GMS Memo”). The GMS is being prepared by Watson & Associates Economists Ltd. and is intended to identify future growth and urban land needs within the City of the Kawartha Lakes to the year 2051. It is intended to inform the completion of the City’s Municipal Comprehensive Review and Official Plan update. As noted on their October 10, 2024, Project Update, the GMS final report is additionally intended to integrate the new policies brought forward by the new Provincial Planning Statement, 2024 (PPS 2024) which came into effect on October 20, 2024, replacing the previous Provincial Planning Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019. The GMS is currently in Phase 4 which includes preparation of the draft GMS report.

2.0 East Lindsay MZO and Conceptual Development Plan

In November 2021, the Minister of Municipal Affairs and Housing issued an order pursuant to Section 47 of the Planning Act establishing a Minister’s Zoning Order for a portion of Flato’s land holdings in Lindsay (O. Reg 771/21, as amended, collectively the “MZO”). The MZO applies to the East Lindsay MZO Lands. The MZO permitted a suite of urban uses that would facilitate the future development of the East Lindsay MZO Lands into a new complete community in East Lindsay. The MZO was subsequently amended by O. Regs 163/22, 490/22, and 54/23 which expanded the lands subject to the zoning provisions in the MZO to include

additional lands and provided additional provisions for the lands subject to the MZO. Section 3 of the Planning Act states that the Minister may issue policy statements on matters relating to municipal planning that in the opinion of the Minister are of provincial interest. As such, the East Lindsay MZO should be considered to represent a provincial interest in the immediate development of housing to meet the forecasted growth.

Figure 1: East Lindsay MZO Concept Plan



Source: MGP (2024)

To support the MZO and to illustrate how the City and Flato’s guiding policy principles would be achieved across the MZO Lands, Flato and its consultant team have prepared a concept plan illustrating the conceptual layout and full build-out of the East Lindsay MZO Lands (“Concept Plan”). The Concept Plan is shown in Figure 1 above and represents good planning that aligns with local and provincial policy direction to provide a complete community capable of supporting residents at all stages of life. Pursuant to Policy 2.3.1.2 of the PPS 2024, land use patterns within settlement areas should be based on densities and a mix of land uses that efficiently use land and resources, optimize existing and planned infrastructure and public services facilities, supports active transportation, and is transit supportive where appropriate. The Concept Plan has been developed based on the guiding principles developed to support the MZO as well as local and provincial policy directions to develop complete communities through the provision of a mix of land uses for individuals at every stage of life.

The Concept Plan proposes a primarily residential community in East Lindsay, supplemented by the necessary community services and facilities such as parks, schools, non-residential uses, and infrastructure. The development limits of the Concept Plan were developed based on preliminary information provided by Flato’s consultants, including a preliminary Natural Heritage System and potential hazard lands. On the developable areas, the Concept Plan includes a modified grid-like road network comprised of arterial, collector, and local roads, as well as active transportation connections (e.g. multi-use paths). The Concept Plan provides 36.5 hectares of Stormwater Management Ponds providing ample capacity to service the East Lindsay Lands.

Regarding housing diversity, pursuant to Policy 2.2.1 of the PPS 2024, planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents. The Concept Plan envisions over 9,000 units with a wide range of housing types including 4,550 singles / semi detached units (50% of unit mix), 900 secondary units (25% of single detached units) (10% of total unit mix), 2,100 street townhouses (24% of total unit mix), 1,100 back-to-back townhouses (13% of total unit mix), and 350 apartment units (4% of total unit mix). The proposed unit mix is estimated to support approximately 20,400 people. The range of housing types is intended to provide options for individuals at all stages of life and integrate housing types that are intrinsically more affordable such as townhouses and apartments.

Regarding community uses and commercial space, the Concept Plan integrates approximately eleven (11) parks totaling 21.5 ha of land satisfying the Planning Act required parkland dedication of 2% for non-residential uses and 5% for residential uses. The Concept Plan additionally provides three (3) schools, and approximately 13.10 ha of commercial space. Where possible, complementary uses have been co-located such as parks in close proximity to schools. The Concept Plan integrates these amenities in a manner which encourages connectivity between neighborhoods while supporting the development of complete communities where individuals can live, work, and play. As requested by the City, Flato is also committed to providing a soccer field in a public park within the East Lindsay MZO Lands, as shown on the Concept Plan.

Regarding employment, the Concept Plan generates an estimated 1,035 jobs from the proposed schools and commercial space, as well as an additional 1,225 jobs resulting from

residents working from home (estimated at 6%). This creates a total of 2,260 jobs which results in 22,660 people and jobs for the Concept Plan and/or 53 people and jobs per hectare. There is approximately 17 square feet of commercial space per person which is an appropriate amount as the East Lindsay Lands are proposed as a new community and will be supplemented by the existing commercial services within the existing Lindsay.

3.0 Master Development Agreement

In order to establish a framework for developing the East Lindsay MZO lands, Flato and the City agreed to enter into a Master Development Agreement (“MDA”) to ensure that any development of the East Lindsay MZO Lands continues to proceed in a manner that is logical, phased, and efficient. The MDA was executed on September 1, 2022. Following the amendments to the MZO, Flato and the City engaged in discussions to revise the MDA to reflect the additional lands, amongst other changes, to the MDA.

On May 13, 2024, the revised MDA (“Revised MDA”) was executed. On September 10, 2024, the Revised MDA was registered on title. The Revised MDA references a Concept Plan dated April 11, 2024, which is still under review by City Staff. There have been minor changes to the Concept Plan since then, including the overall units proposed and the population estimate. The estimate in the Revised MDA represents approximate and minimum targets only. The final determination of units and population will occur through the processing of individual development applications for each phase of development of the East Lindsay MZO Lands.

Pursuant to Section 16 of the Revised MDA, Flato is required to develop the East Lindsay MZO Lands generally in accordance with a final Concept Plan and the approved East Lindsay Phasing Plan (to be submitted by Flato to the City’s satisfaction) which sets out the order in which the Flato will develop the Lands, the number and type of residential units and the non-residential uses proposed, per phase, and the proposed location of stormwater facilities, roads, parks, and other public facilities and amenities, the location of all Affordable Housing Units, and the location of all dwelling units to be constructed in order to meet the Entry Level Housing requirement.

As discussed above, the Concept Plan provided in Figure 1 identifies the location of all proposed residential units and non-residential uses as well as all stormwater facilities, roads, parks, and other public facilities and amenities. As mentioned above, a preliminary East Lindsay Phasing Plan has been prepared in support of this letter and is attached at Section 5.1. The East Lindsay Phasing Plan, along with the detailed breakdown provided in Appendices 1 and 2 outlines the allocation of all proposed residential units and the non-residential uses, per phase, including stormwater facilities, roads, parks, and other public facilities and amenities.

As it relates to Flato’s commitment to Affordable Housing, pursuant to Section 35, Option 2 of the Revised MDA, Flato will be conveying land that is sufficient to accommodate all of the Affordable Housing Units that are required based on an agreed upon density of 50 Affordable Housing Units per developable hectare of the East Lindsay MZO Lands. In addition to the conveyance, Option 2 also requires that Flato shall pay to the City the equivalent of four (4) percent of the appraised value of the East Lindsay MZO Lands, with the value of the East

Lindsay MZO Lands determined and payable, per development phase. As such, the East Lindsay Phasing Plan does not outline the location of Affordable Housing Units.

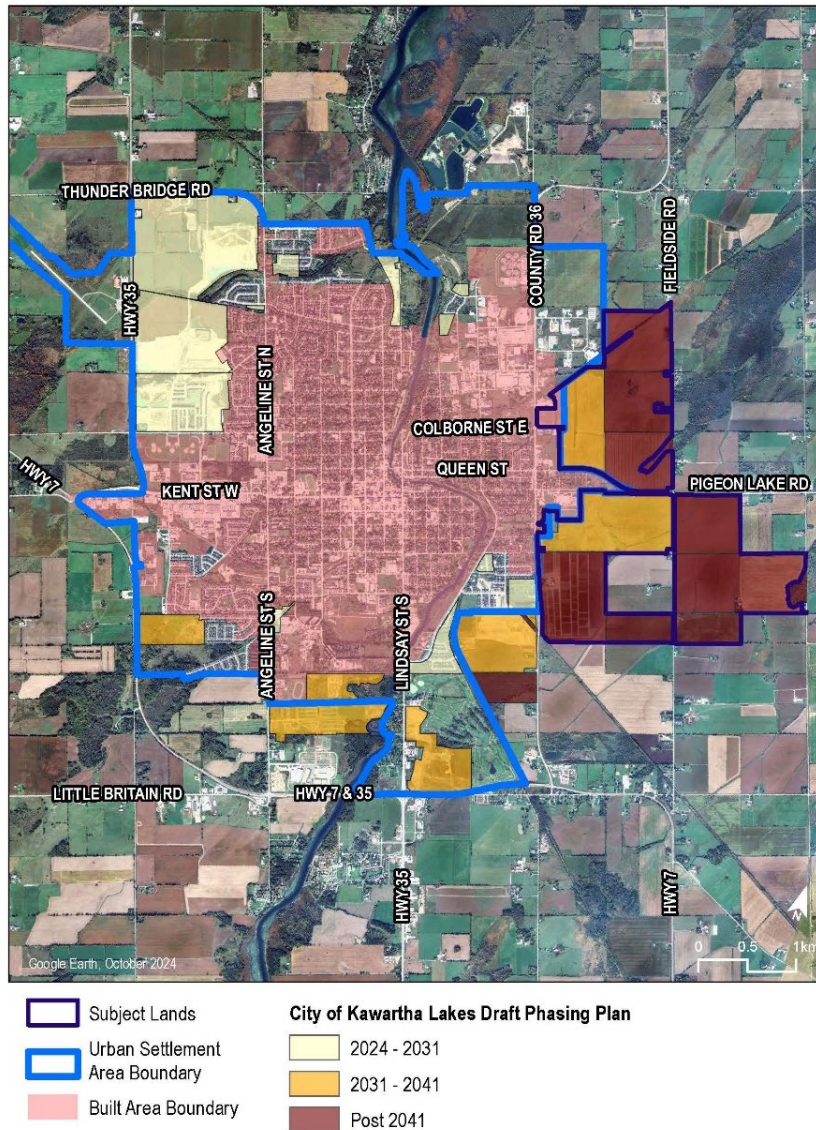
Regarding Entry Level Housing, Section 34 of the Revised MDA requires that Flato agree that a minimum of 20% of all dwelling units to be constructed on the East Lindsay MZO Lands shall be comprised of a mix of “entry-level” housing supply including, but not limited to, apartment housing, basement suites, garden suites, back-to-back townhouses, street townhouses, senior apartments, additional residential suits as per By-law 2020-160, triplexes, and fourplexes. The distribution of these dwelling units are identified in the unit distribution breakdown by phase found in Appendix 1 and 2.

The Concept Plan and the East Lindsay Phasing Plan provide the particulars required pursuant to Section 16 of the Revised MDA.

4.0 GMS Proposed Phasing

The GMS Memo states that under the GMS recommended scenario forecast, the total permanent population base for the City of Kawartha Lakes is forecasted to grow to approximately 130,000 persons by 2051 representing an increase of 48,800 residents between 2021 and 2051. The GMS Memo also states that to accommodate the forecasted population Growth across the City to the year 2051, an estimated 21,640 new households (720 new households annually) will need to be constructed. It should also be noted that in 2023 the City of Kawartha Lakes released a housing pledge committing to a target of constructing 6,500 housing units by the end of 2031.

Figure 2: East Lindsay MZO Lands Overlay in GMS Memo Phasing



Source: City of Kawartha Lakes (2024), MGP (2024)

To accommodate this population increase, the GMS Memo provides a phasing plan (“GMS Phasing Plan”) for the Lindsay designated greenfield area to provide direction on timing of residential and non-residential growth for the new urban limit of the Lindsay Settlement Area.

As shown in Figure 2 above which is an overlay of the Subject Lands on the GMS Phasing Plan, as presented in the GMS Memo, the GMS Phasing Plan identifies the timeframe for development of a western portion of the East Lindsay MZO Lands as Phase 2 (2031-2041). Phase 2 in the GMS Phasing Plan is described as currently inactive designated residential lands, including the approved East Lindsay MZO Lands which are located within the existing urban boundary of Lindsay. The remaining East Lindsay MZO Lands are located within Phase 3 (post 2041) in the GMS Phasing Plan. Phase 3 is described as the remaining approved East Lindsay MZO Lands located outside of the urban settlement area boundary of Lindsay.

4.1 Conforming to the New PPS 2024 and Meeting Growth Projections

The prioritization of the East Lindsay MZO Lands in the GMS Phasing Plan will allow the City to support accommodation of the provinces projected needs and meet its 2031 Housing Pledge by utilizing development ready lands in a timely manner. As discussed in Section 1 of this letter, the October 10, 2024, Project Update posted on the City of Kawartha Lakes website states that the GMS final report will integrate the new policies brought forward by the PPS 2024. Policy 2.1.3 of the PPS 2024 states the following:

“At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon.

Where the Minister of Municipal Affairs and Housing has made a zoning order, the resulting development potential shall be in addition to projected needs over the planning horizon established in the official plan. At the time of the municipality’s next official plan update, this additional growth shall be incorporated into the official plan and related infrastructure plans.”

As previously noted, the East Lindsay MZO represents a provincial interest for development to meet projected housing needs of the province. Section 2 of the Planning Act requires that councils of municipalities, in carrying out their responsibilities under the Planning Act, are to have regard to matters of provincial interest including the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems, the orderly development of safe and healthy communities, the adequate provision of a full range of housing, including affordable housing, and the appropriate location of growth and development. The purpose of the GMS is to support the City’s Municipal Comprehensive Review and Official Plan update and therefore should reflect the available nature of the East Lindsay MZO Lands that are intended to support the provincial interest in meeting the projected needs in addition to supporting accommodation of the City’s projected growth and committed 2031 housing pledge in the near term.

Policy 2.1.4 further states the following:

“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.”*

Under policy 2.1.4.b), the City of Kawartha Lakes must maintain land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned. The East Lindsay MZO Lands are suitably zoned for residential development

and should be phased to allow for the land to be serviced in a timeline that would assist the City in providing provide the three-year supply of residential units available through lands suitably zoned.

Regarding servicing allocation, Policy 3.6.1.a) states that planning for sewage and water services shall accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services. Given the provincial interest of the East Lindsay MZO and the potential to provide early servicing allocation to the western portions of East Lindsay MZO Lands (Phases 1-3), the East Lindsay MZO Lands should be included in the early phases of the City's GMS to expedite the delivery of servicing to these lands and provide for their timely development.

Policy 3.6.1d) additionally states that planning for sewage and water services shall integrate servicing and land use considerations at all stages of the planning process. The East Lindsay MZO represents a provincial interest in immediate development of housing to accommodate forecasted growth and is a primary planning consideration. Therefore, the East Lindsay MZO Lands that can be developed within the 2031 horizon should be expedited in the City's phasing plan and planned for servicing in the near-term at all stages of the planning process.

This is further supported under Policy 3.6.1e) which states that planning for sewage and water services shall consider opportunities to allocate, and re-allocate, if necessary, the unused system capacity of municipal water services and municipal sewage services to support efficient use of these services to meet current and projected needs for increased housing supply. As previously noted, the GMS Memo states that to accommodate the forecasted population Growth across the City to the year 2051, an estimated 21,640 new households are required, and the City has additionally committed to a housing pledge of 6,500 housing units by the end of 2031. Several portions of Flato owned land along the western side of the East Lindsay MZO lands have received development application approvals or are under review with the City following received Notice of Complete Application. Phases 1-3 of the East Lindsay MZO lands will provide housing in the near term to assist the City in meeting its housing pledge to 2031. Beyond this, the lands can and will continue to development to meeting the medium-term continued housing demand to 2041.

5.0 Recommended Phasing for Orderly Development to Meet Projected Needs

As per the Revised MDA, Flato's consulting team has undertaken preparation of the East Lindsay Phasing Plan for the East Lindsay MZO Lands. The East Lindsay Phasing Plan divides the development of the East Lindsay MZO Lands in 6 stages, reflecting the current approvals as well as a logical servicing sequence and the paces of building units targeted. The East Lindsay Phasing Plan has been prepared with the intent of orderly development that aligns with the timely provision of infrastructure and public service facilities. It will deliver complete neighbourhoods to the extent possible within each phase and provide a range and mixed of housing in each phase as is discussed further in Section 5.1 and broken down in Appendix 1.

The East Lindsay Phasing Plan has been based on a growth rate that provides for the logical and paced delivery of this part of Lindsay. In general, the City has produced approximately 300 housing starts per year for the last decade. The proposed East Lindsay Phasing Plan

would provide for a similar pace of growth per year on the East Lindsay lands, which is in keeping with the City’s need to provide more housing at a faster pace to achieve its housing pledge and forecasted need. Policy 34.8 of the City of Kawartha Lakes Official Plan (“CKLOP”) states that in full-service areas, priority shall be given to the development of those lands that are presently serviced by piped sewer and water systems or those areas that can most easily be serviced at minimal expense. Policy 34.8 continues to state that the timing of development shall be based on the regulation of the geographic sequence and balance so that:

- There is the logical extension of municipal services that avoids the leapfrogging of large undeveloped tracts of land;
- a compact urban form and pattern of development is maintained;
- the provision of all municipal services proceeds in an economically viable manner; and
- there are adequate opportunities for both infilling and greenfield development but first priority is to be given to infilling.

The East Lindsay Phasing Plan has utilized contiguous growth to ensure that complete and serviced communities are developed per each phase. This is to ensure that leapfrogging of developable lands is avoided and that residents are well serviced by recreation, shopping, and transportation facilities in each phase without undue exposure to ongoing construction or disruption. The contiguous development of complete communities within the East Lindsay Phasing Plan is also intended to minimize financial implications by the municipality by ensuring that servicing can be allocated and provided in a logical, consistent, and efficient manner.

Regarding first priority being given to infilling (intensification within the built boundary), the GMS Memo stated that the intensification target between 2021-2051 for the City would be reduced to 20% (current CKLOP identifies 30% intensification target). Based on the GMS Memo’s estimated 21,640 units of growth by 2051, the 20% intensification would result in 4,328 units from 2026 to 2051. Prorating this estimate over 25 years (2026-2051) is 173 units per year. As further shown below in Section 5.1, Phases 1, 2, and 3 of the East Lindsay Phasing Plan can and should begin developing by 2031. Therefore, as long as 1,038 units are protected for infill over the next 6 years (2025-2031), all other allocations should be considered relative to relevant planning considerations and willingness to proceed. It should be recognized that this amount of intensification is not anticipated within Lindsay and a lesser amount should be identified once data is available, however, no detailed technical work has been provided or shared with us to allow for this analysis.

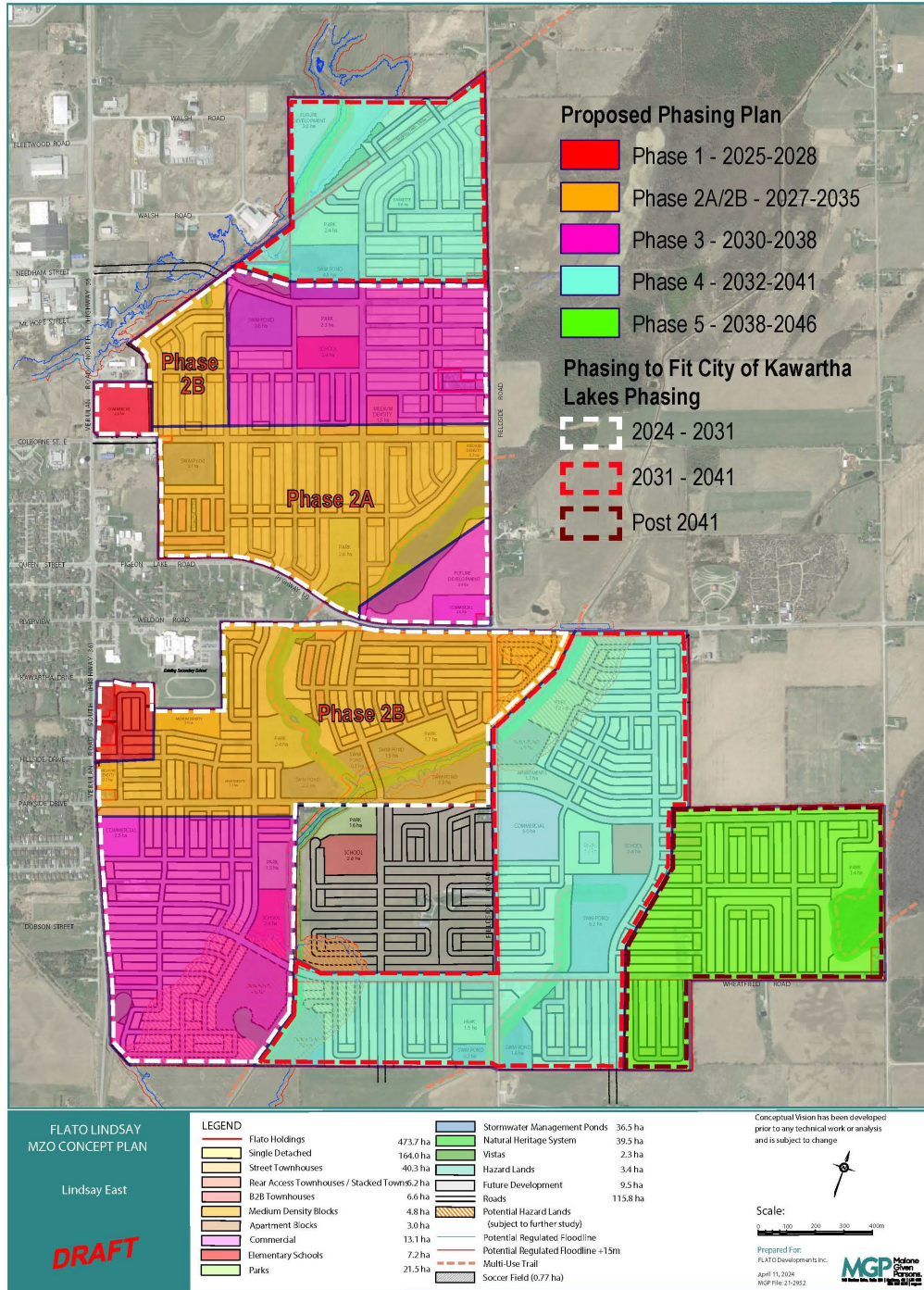
As such, Phases 1, 2, and 3, pursuant to the East Lindsay Phasing Plan below, should be a priority and identified in the earliest phases. Prioritizing the East Lindsay MZO Lands will align with Provincial and City policy as development of Phase 1, 2 and 3 of the East Lindsay MZO Lands can and will commence prior to 2031 and are required to assist the City in meeting its 2031 Housing Pledge.

5.1 East Lindsay Phasing Plan

Figure 3 below provides the recommended East Lindsay Phasing Plan, prepared by Flato’s consulting team. The East Lindsay Phasing Plan provides 5 Phases for development of the

East Lindsay MZO Lands based on the current status of ongoing applications, logical servicing allocation and contiguous growth, and landowner participation. As discussed above, the East Lindsay Phasing Plan encompasses the entirety of the East Lindsay MZO Lands which is estimated to provide approximately 9,000 units. Table 1 in Appendix 1 provides a breakdown of the estimated unit mix and population per phase of the East Lindsay Phasing Plan.

Figure 3: East Lindsay Phasing Plan



Source: MGP (2024), Google Earth

Phase 1

The Phase 1 lands include lands that have already received approvals and should be developed in the near term. This includes two (2) portions of lands along the west boundary of the East Lindsay MZO Lands. The first portion of Phase 1 lands is located in the north half of the East Lindsay MZO Lands and will provide 3.6 ha of commercial land use and has received approval for a Site Plan Application.

The second portion of Phase 1 lands is located in the south half of the East Lindsay MZO Lands and has received approval for a Draft Plan of Subdivision for primarily townhouse dwellings. The entirety of these townhouse dwellings can be considered “entry level” housing, as defined by the MDA. Phase 1 begins in 2025 and reaches full buildout by 2028 and is expected to provide approximately 145 street townhouse units representing 1.58% of the total units.

Phase 2

Phase 2 is split between two (2) phases referred to as Phase 2A and Phase 2B. Phase 2 is intended to represent lands that are either currently undergoing an application process or are logically next to begin their application processes in the near future due to their location abutting the Phase 1 lands as well as the existing built boundary of Lindsay. The Phase 2 lands contain a range of residential dwelling units including single detached, street townhouses, rear access townhouses, back-to-back townhouses, and medium density blocks as well as parks and SWM Ponds. The lands are intended to begin the development process in 2032 and achieve buildout by 2041.

Phase 2A includes lands that are currently undergoing an application for Draft Plan of Subdivision (File Number: D05-2024-005) and has most recently received a Notice of Complete Application and is undergoing circulation and review with the City. Phase 2A will provide an estimated 520 single detached units, 104 Additional Dwelling Units (“ADU”), 215 street townhouse units, and 272 back-to-back townhouse units. Phase 2A will provide a total of 1111 units which is approximately 12.1% of the total units. Regarding Entry Level Housing, Phase 2A will provide approximately 591 units (53% of Phase 2A units) that would be defined as “entry level” as per the Revised MDA. Phase 2A is also proposed to provide a 2.5 ha park co-located near the NHS and a 2.7 ha SWM Ponds.

Phase 2B includes lands to the north and south of the Phase 2A lands and represents the remaining lands that will have submitted applications in the near future. Phase 2B will provide an estimated 668 single/semi detached units, 134 ADUs, 620 street townhouse units, 448 back-to-back townhouse units, and 156 apartment units. Phase 2B will provide 2026 units which is approximately 22.1% of the total units. Regarding Entry Level Housing, Phase 2B will provide approximately 1,358 units (67% of Phase 2B units) that are defined as “entry level” as per the Revised MDA. The southern portion of Phase 2B is also proposed to provide 2 parks, 2.4 ha and 1.7 ha in size, as well as 4 SWM Ponds of 1.5 ha, 0.8 ha, 3.3 and 2.2 ha sizes and are located adjacent to the NHS corridor.

Phase 3

Phase 3 lands are located north and south of the Phase 2 lands as well as a small portion centrally located in-between them. The Phase 3 lands are located to be readily available to

receive servicing following completion of the majority of Phase 2. The north and south portions of Phase 3 contain a range of residential uses including single detached, street townhouses, rear access townhouses, back-to-back townhouses and medium density as well as schools, parks, and commercial uses.

Phase 3 is anticipated to provide an estimated 946 single/semi detached units, 169 future development units (assumed single/semi detached units), 223 ADUs, 475 street townhouse units, and 344 back-to-back townhouse units. Phase 3 will provide 2157 units which is approximately 23.5% of the total units. Regarding Entry Level Housing, Phase 3 will provide approximately 1,008 units (48% of Phase 3 units) that would be defined as “entry level” as per the Revised MDA.

The north portion of Phase 3 will also provide a SWM Pond (3.8 ha), a park (2.3 ha), and a school (2.4 ha). The central portion of Phase 3 between Phase 2A and Phase 2B is provided as the future development (5.9 ha) discussed above as well as 2 ha of commercial uses. The southern portion will provide 2.5 ha of commercial land uses as well as a park (1.5 ha), a school (2.4 ha), and a SWM Pond (4.6 ha).

Phase 4

Phase 4 lands are located in the farthest north portion of the East Lindsay MZO Lands as well as southeast of the southern Phase 2 and 3 lands. These lands are located near boundaries of both Phase 2 and Phase 3 lands. They represent the next logical step in providing contiguous and efficient buildout of the East Lindsay MZO Lands due to their geographic location bordering previous phases. The Phase 4 lands provide a range of uses and amenities including residential, commercial, institutional, parks, and SWM ponds.

The Phase 4 Lands are expected to provide 1412 single/semi detached units, 78 future development units (assumed single/semi detached units), 298 ADUs, 515 street townhouse units, and 204 apartment units. Phase 4 will provide an estimated 2507 units which represents 27.3% of the total units. Regarding Entry Level Housing, Phase 4 will provide approximately 1,001 units (40% of Phase 4 units) that would be defined as “entry level” as per the Revised MDA.

The southern Phase 4 lands will provide 5 ha of commercial land use, a school (2.4 ha) along the eastern boundary, 3 parks (1.8 ha, 3.3 ha, and 1.5 ha in sizes), and 5 SWM Ponds ranging from 0.7 ha to 6.2 ha in size. The northern Phase 4 lands will provide an additional 4.5 ha SWM Pond as well as 2 parks sized 2.4 ha and 0.6 ha.

Phase 5

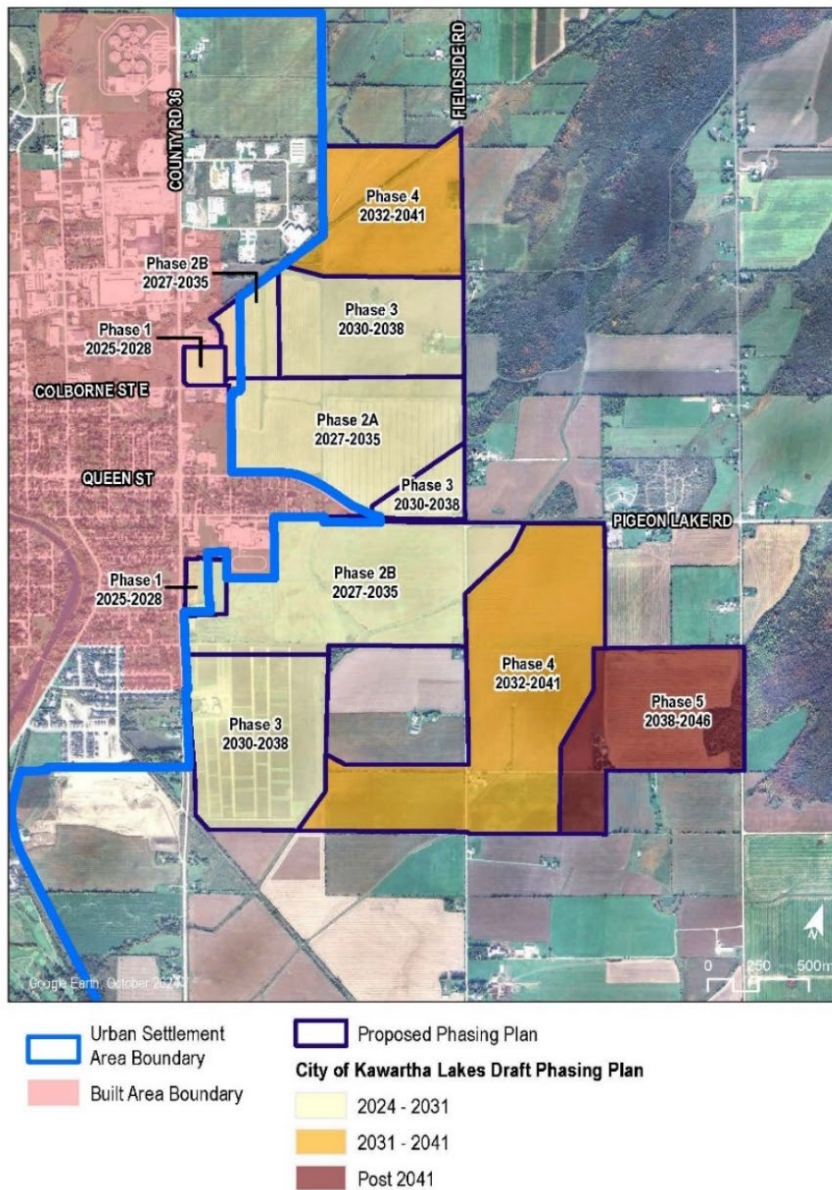
The Phase 5 lands are located in the most eastern portion of the East Lindsay MZO Lands near the southeastern corner. They are proposed to begin development processes in 2038 and achieve buildout by 2046. The Phase 5 lands propose primarily residential uses in the form of single detached, street townhouses, rear access townhouses and back-to-back townhouses as well as a 1.5 ha park abutting the eastern Natural Heritage System. They are intended to be last in the anticipated timeframe for development of Flato’s owned properties. They are logically the final portion of land to receive servicing within the East Lindsay MZO Lands as they are the farthest away.

The Phase 5 lands are anticipated to provide 777 single/semi detached units, 155 ADUs, 205 street townhouse units, and 88 back-to-back townhouse units. Phase 5 will provide 1226 units which represents approximately 13.4% of the total units. Regarding Entry Level Housing, Phase 5 will provide approximately 448 units (37% of Phase 5 units) that would be defined as “entry level” as per the Revised MDA.

5.2 Fitting into the City’s Phasing Plan

Figure 4 below (“Altered Phasing Plan”) directly translates the East Lindsay Phasing Plan into the 3 phasing stages presented in the GMS Memo. Table 2 in Appendix 2 provides further breakdown of estimated units, land uses, and population in the Altered Phasing Plan.

Figure 4: Proposed Phasing within GMS Memo Phasing Plan



Source: City of Kawartha Lakes (2024), MGP (2024)

GMS Phase 1 (2024 – 2031)

The respective lands located in Phases 1, 2, and 3 of the East Lindsay Phasing Plan would fall within Phase 1 of the GMS Phasing Plan. As discussed above, all lands in Phase 1 have received either Site Plan Approval or Draft Plan Approval and the lands in Phase 2A are currently undergoing review for a Draft Plan of Subdivision and have received Notice of Complete Application.

Under Phase 1 of the Altered Phasing Plan, the East Lindsay MZO Lands are estimated to provide a unit distribution of 2135 single detached units, 169 future development units (assumed as single/semi detached units), 427 ADUs, 1455 street townhouse units, 1064 back-to-back townhouses, and 156 apartment units. Phase 1 of the Altered Phasing Plan would provide approximately 5809 units which is 64.8% of the total units. Phase 1 of the Altered Phasing Plan would additionally provide 5 parks (10.7 ha), 8.1 ha of commercial space, and 7 SWM Ponds (18.7 ha).

GMS Phase 2 (2031-2041)

Phase 4 of the East Lindsay Phasing Plan would translate to Phase 2 of the City's GMS Phasing Plan. Phase 4 represents next logical step for residential development regarding servicing and growth but have not yet begun their respective development application processes.

Phase 2 of the Altered Phasing Plan will provide an estimated unit distribution of 1412 single/semi detached units, 262 ADUs, 515 street townhouse units, 120 apartment units, and 78 future development units (assumed as single/semi detached units). Phase 2 of the Altered Phasing Plan provides 2491 units which is 27.77% of the total units. Phase 2 of the Altered Phasing Plan would additionally provide 4 parks (10.6 ha), a walking trail (1 ha), 3 schools, 9.5 ha of commercial space, and 6 SWM Ponds (17.8 ha).

GMS Phase 3 (Post 2041)

The remaining proposed Phase 5 would align with Phase 3 of the GMS Phasing Plan. As discussed above, the proposed Phase 5 of the East Lindsay Phasing Plan includes the farthest located lands to the east. As such they would be classified within the GMS's Phase 3 which is intended to occur in 2041 to long term buildout.

Under Phase 3 of the Altered Phasing Plan, the East Lindsay MZO Lands are estimated to provide 777 single/semi detached units, 155 ADUs, 205 street townhouse units, and 88 back-to-back townhouse units. Phase 3 of the Altered Phasing Plan provides 1226 units which is approximately 13.4% of the total units. Phase 3 of the Altered Phasing Plan would provide 1.4 ha of parkland.

6.0 Conclusion

It is our professional planning opinion that the proposed preliminary East Lindsay Phasing Plan, and its translation to the Altered GMS Phasing Plan, supports the PPS 2024 policies, has been developed in unison with a Concept Plan that represents good planning, provides the necessary near future development to support the City's 2031 housing pledge, and provides a logical timeline capable of developing lands that are ready for near term development. We request that the City update the GMS to reflect the East Lindsay Phasing Plan at Figure 3 of this letter for the aforementioned reasons.

Additionally, to provide further analysis of the GMS, we formally request to receive the background data and information that was used for preparation of the GMS.

Yours very truly,
Malone Given Parsons Ltd.



Matthew Cory, MCIP, RPP, PLE, PMP

Principal, Planner, Land Economist, Project Manager

cc. Nazy Majidi, VP of Development and Legal Counsel, Flato Developments Inc.
Katarzyna Sliwa, partner, Dentons LLP
Isaiah Banach, counsel, Dentons LLP
Jessica Jakubowski, associate, Dentons LLP

encl. Appendix 1: Lindsay East Phasing Plan Land Budget
Appendix 2: GMS Altered Phasing Plan Land Budget

Appendix 1: East Lindsay Phasing Plan Land Budget

Land Use	Area (ha)	Density (units/ha)	Unit #	Total Distribution (%)	Unit PPU	Population
Phase 1						
Single/Semi Detached	0	26	0	0.00%	2.489	0
Secondary Unit (25% of Singles, considered an apartment)	-	-	0	0.00%	1.29	0
Street Townhouse	2.9	50	145	1.58%	2.214	321
B2B Townhouse	0	80	0	0.00%	2.214	0
Apartment	0	120	0	0.00%	1.29	0
Parkland and Recreation Facilities	0	-	-	-	-	-
Schools	0	-	-	-	-	-
Natural Heritage System	0	-	-	-	-	-
Commercial	3.6	-	-	-	-	-
SWM Pond	0	-	-	-	-	-
Roads	1.8	-	-	-	-	-
Sub-Total	8.3	-	145	1.58%	-	321
Phase 2a						
Single/Semi Detached	20	26	520	5.67%	2.489	1294
Secondary Unit (25% of Singles, considered an apartment)	-	-	104	1.13%	1.29	134
Street Townhouse	4.3	50	215	2.34%	2.214	476
B2B Townhouse	3.4	80	272	2.97%	2.214	602
Apartment	0	120	0	0.00%	1.29	0
Parkland and Recreation Facilities	2.8	-	-	-	-	-
Schools	0	-	-	-	-	-
Natural Heritage System	1.1	-	-	-	-	-
Commercial	0	-	-	-	-	-
SWM Pond	2.7	-	-	-	-	-
Roads	16.4	-	-	-	-	-

Sub-Total	50.7	-	1111	12.11%	-	2507
Phase 2b						
Single/Semi Detached	25.7	26	668	7.29%	2.489	1663
Secondary Unit (25% of Singles, considered an apartment)	-	-	134	1.46%	1.29	172
Street Townhouse	12.4	50	620	6.76%	2.214	1373
B2B Townhouse	5.6	80	448	4.88%	2.214	992
Apartment	1.3	120	156	1.70%	1.29	201
Parkland and Recreation Facilities	4.1	-	-	-	-	-
Schools	0	-	-	-	-	-
Natural Heritage System	8.4	-	-	-	-	-
Commercial	0	-	-	-	-	-
SWM Pond	7.8	-	-	-	-	-
Roads	22.7	-	-	-	-	-
Sub-Total	88	-	2026	22.09%	-	4401
Phase 3						
Single/Semi Detached	36.4	26	946	10.32%	2.489	2356
Secondary Unit (25% of Singles, considered an apartment)	-	-	223	2.43%	1.29	288
Street Townhouse	9.5	50	475	5.18%	2.214	1052
B2B Townhouse	4.3	80	344	3.75%	2.214	762
Apartment	0	120	0	0.00%	1.29	0
Parkland and Recreation Facilities	3.8	-	-	-	-	-
Schools	4.8	-	-	-	-	-
Natural Heritage System	12.5	-	-	-	-	-
Future Development	6.5	26	169	1.84%	2.489	421
Commercial	4.5	-	-	-	-	-
SWM Pond	8.2	-	-	-	-	-
Roads	26.4	-	-	-	-	-

Sub-Total	116.9	-	2157	23.52%	-	4877
Phase 4						
Single/Semi Detached	54.3	26	1412	15.39%	2.489	3514
Secondary Unit (25% of Singles, considered an apartment)	-	-	298	3.25%	1.29	384
Street Townhouse	10.3	50	515	5.61%	2.214	1140
B2B Townhouse	0	80	0	0.00%	2.214	0
Apartment	1.7	120	204	2.22%	1.29	263
Parkland and Recreation Facilities	10.6	-	-	-	-	-
Schools	2.4	-	-	-	-	-
Natural Heritage System	15.6	-	-	-	-	-
Future Development	3	26	78	0.85%	2.489	194
Commercial	5	-	-	-	-	-
SWM Pond	17.8	-	-	-	-	-
Roads	33.3	-	-	-	-	-
Sub-Total	154	-	2507	27.33%	-	5496
Phase 5						
Single/Semi Detached	29.9	26	777	8.48%	2.489	1935
Secondary Unit (25% of Singles, considered an apartment)	-	-	155	1.70%	1.29	201
Street Townhouse	4.1	50	205	2.24%	2.214	454
B2B Townhouse	1.1	80	88	0.96%	2.214	195
Apartment	0	120	0	0.00%	1.29	0
Parkland and Recreation Facilities	1.4	-	-	-	-	-
Schools	0	-	-	-	-	-
Natural Heritage System	5	-	-	-	-	-
Commercial	0	-	-	-	-	-
SWM Pond	0	-	-	-	-	-
Roads	15.8	-	-	-	-	-

Sub-Total	57.3	-	1226	13.37%	-	2784
Total						
Single/Semi Detached	166.3	26	4324	47.14%	2.489	10762
Secondary Unit (20% of Singles, considered an apartment)	-	-	914	9.97%	1.29	1179
Street Townhouse	43.5	50	2175	23.71%	2.214	4815
B2B Townhouse	14.4	80	1152	12.56%	2.214	2551
Apartment	3	120	360	3.93%	1.29	464
Parkland and Recreation Facilities	22.7	-	-	-	-	-
Schools	7.2	-	-	-	-	-
Natural Heritage System	42.6	-	-	-	-	-
Future Development	9.5	26	247	2.69%	2.489	615
Commercial	13.1	-	-	-	-	-
SWM Pond	36.5	-	-	-	-	-
Roads	116.4	-	-	-	-	-
Total	475.2	-	9172	100.00%	-	20386

Appendix 2: GMS Altered Phasing Plan Land Budget

Land Use	Area (ha)	Density (units/ha)	Unit #	Total Unit Distribution (%)	PPU	Population
Phase 1						
Single/Semi Detached	82.1	26	2135	23.80%	2.489	5313
Secondary Unit (25% of Singles, considered an apartment)	0	-	427	4.76%	1.29	551
Street Townhouse	29.1	50	1455	16.22%	2.214	3221
B2B Townhouse	13.3	80	1064	11.86%	2.214	2356
Apartment	1.3	120	156	1.74%	1.29	201
Parkland and Recreation Facilities	10.7	-	-	-	-	-
Schools	4.8	-	-	-	-	-
Natural Heritage System	22	-	-	-	-	-
Future Development	6.5	26	169	1.88%	2.489	421
Commercial	8.1	-	-	-	-	-
SWM Pond	18.7	-	-	-	-	-
Roads	67.3	-	-	-	-	-
Sub-Total	263.9	-	5406	60.27%	-	12063
Phase 2						
Single/Semi Detached	54.3	26	1412	15.74%	2.489	3514
Secondary Unit (25% of Singles, considered an apartment)	-	-	282	3.15%	1.29	364
Street Townhouse	10.3	50	515	5.74%	2.214	1140
B2B Townhouse	0	80	0	0.00%	2.214	0
Apartment	1.7	120	204	2.27%	1.29	263
Parkland and Recreation Facilities	10.6	-	-	-	-	-
Schools	2.4	-	-	-	-	-
Natural Heritage System	15.6	-	-	-	-	-
Future Development	3	26	78	0.87%	2.489	194
Commercial	5	-	-	-	-	-
SWM Pond	17.8	-	-	-	-	-
Roads	33.3	-	-	-	-	-
Sub-Total	154	-	2491	27.77%	-	5476
Phase 3						
Single/Semi Detached	29.9	26	777	8.67%	2.489	1935

Secondary Unit (25% of Singles, considered an apartment)	0	-	155	1.73%	1.29	201
Street Townhouse	4.1	50	205	2.29%	2.214	454
B2B Townhouse	1.1	80	88	0.98%	2.214	195
Apartment	0	120	0	0.00%	1.29	0
Parkland and Recreation Facilities	1.4	-	-	-	-	-
Schools	0	-	-	-	-	-
Natural Heritage System	5	-	-	-	-	-
Commercial	0	-	-	-	-	-
SWM Pond	0	-	-	-	-	-
Roads	15.8	-	-	-	-	-
Sub-Total	57.3	-	1226	13.67%	-	2784
Total						
Single/Semi Detached	166.3	26	4324	47.14%	2.489	10762
Secondary Unit (25% of Singles, considered an apartment)	0	-	914	9.97%	1.29	1179
Street Townhouse	43.5	50	2175	23.71%	2.214	4815
B2B Townhouse	14.4	80	1152	12.56%	2.214	2551
Apartment	3	120	360	3.93%	1.29	464
Parkland and Recreation Facilities	22.7	-	-	-	-	-
Schools	7.2	-	-	-	-	-
Natural Heritage System	42.6	-	-	-	-	-
Future Development	9.5	26	247	2.69%	2.489	615
Commercial	13.1	-	-	-	-	-
SWM Pond	36.5	-	-	-	-	-
Roads	116.4	-	-	-	-	-
Total	475.2	-	9172	100.00%	-	20386