

September 4, 2020

Friday Harbour Resort Association
3999 Friday Drive
Innisfil, Ontario
L9S 0J7

Attention: James DiRenzo, President & CEO

Dear Mr. DiRenzo:

Re: Proposed Removal of Occupancy Restrictions for Friday Harbour Resort and Considerations for a Municipal Land Needs Assessment - Addendum

Introduction

As you know, we previously provided you with our opinion dated June 26, 2020, regarding the proposed removal of the existing occupancy restrictions for the Friday Harbour Resort (the "Resort") and the potential implications for a municipal land needs assessment. Our opinion formed part of the supporting documents submitted to the Town of Innisfil in respect of the Official Plan Amendment and Zoning By-law Amendment applications to remove the occupancy restrictions.

In that opinion, we noted that on June 16, 2020, the Minister of Municipal Affairs and Housing (the "Minister") had issued proposed amendments to the 2019 Growth Plan for the Greater Golden Horseshoe (the "Growth Plan"), as well as details of a proposed land needs assessment methodology to be used in conjunction with the Growth Plan.

Since then, amendments to the Growth Plan have been approved and the Minister has issued a new Land Needs Assessment Methodology (the "Methodology"), both of which came into effect on August 28, 2020. Thus, the purpose of this addendum letter is to highlight the relevant portions of the Growth Plan amendments and the Methodology and to advise whether these changes have any impact on the opinion set out in our letter of June 26, 2020.

Growth Plan Amendments

As anticipated in our opinion letter, the amendments to the Growth Plan included an extension of the planning horizon from 2041 to 2051, with updated population and employment forecasts for single-tier and upper-tier municipalities within the Greater Golden Horseshoe, as provided in a revised Schedule 3. For Simcoe County, the 2051

population and employment forecasts to 2051 are 555,000 and 198,000, respectively. At the same time, the previous Schedule 7 forecasts for the Simcoe Sub-area have been removed.

Moreover, consistent with the then proposed amendments referred to in our opinion letter, the Growth Plan has been amended to clearly stipulate that the forecasts in Schedule 3 are “minimum” forecasts, and that upper- or single-tier municipalities may establish higher forecasts through their municipal comprehensive reviews (see, for example, policies 2.2.2.1 and 5.2.4.2).

Lastly, we confirm that there were no substantive amendments to the relevant policies or definitions in the Growth Plan that were referred to in our opinion letter.

Consequently, it is our view that the Growth Plan amendments approved on August 28, 2020 do not change the opinion we provided in our letter of June 26, 2020.

Land Needs Assessment Methodology

We have reviewed the Methodology and note that there is no reference whatsoever to resort residential units, or resorts generally, nor is there any reference to residential units where occupancy restrictions may or may not exist.

Further, although the Methodology identifies key components to be completed by municipalities as they plan to ensure that sufficient land is available to accommodate all housing market segments, avoid housing shortages and consider market demand, the Methodology also provides flexibility to municipalities to develop their own assumptions and make appropriate adjustments, acknowledging that “local needs are diverse”.

Thus, there is nothing in the Methodology that would change the opinion provided in our letter of June 26, 2020.

Conclusion

Having reviewed the recently approved amendments to the Growth Plan and the Methodology that was issued by the Minister, we confirm that the opinion expressed in our letter of June 26, 2020 remains.

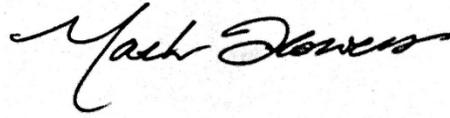
More specifically, it remains our opinion that the removal of the existing occupancy restrictions for the Resort would not have implications for a land needs assessment that may be undertaken by either the County of Simcoe or the Town of Innisfil to determine the potential for settlement area boundary expansions within their jurisdiction.

We trust that this is satisfactory. However, please do not hesitate to contact us if you have any questions regarding this addendum letter, or if you require anything further.

Yours sincerely,
DAVIES HOWE LLP



Susan Rosenthal
Professional Corporation



Mark R. Flowers
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copy: Don Given and John Genest, Malone Given Parsons Ltd.