

January 26, 2023

MGP File: 15-2422

The Honourable Minister Steve Clark
Ministry of Municipal Affairs and Housing
777 Bay Street, Toronto, ON M5G 2E5

Attention: Mrs. Julianna Zhuo

Dear Mr. Clark:

**RE: Comments on Simcoe County Official Plan Amendment 7
ERO No. 019-6113 (Ministry Reference No. 43-OP- 221936)
ICG Golf Inc., Bayview-Wellington (Highlands) Inc., and 2523951 Ontario Inc. (the
"Bradford Highlands Joint Venture" or "BHJV")
23 Brownlee Drive and 2820 & 2848 Line 5, Town of Bradford West Gwillimbury**

Malone Given Parsons Ltd. ("MGP") is the planning consultant for Bradford Highlands Joint Venture ("BHJV"), the owner of property municipally known as 23 Brownlee Drive and 2820 and 2848 Line 5 in the Town of Bradford West Gwillimbury ("Subject Lands"). The purpose of this letter is to provide comments on the County's Official Plan Amendment 7 ("COPA 7") as it relates to the Subject Lands. This submission continues upon our prior submissions to the County including letters dated March 31, 2021, May 17, 2021, October 20, 2021, April 18, 2022 and June 16, 2022, providing comments on the County's Land Needs Assessment ("LNA") and Municipal Comprehensive ("MCR") process. A full package of previous correspondence has been provided in Appendix 1.

This letter provides additional comments regarding COPA 7 (dated Aug 2022) and provides a detailed response to the Settlement Expansion Area Evaluation Criteria, which comprehensively reviews the Subject Lands against the Province's criteria for settlement area boundary expansions (see Appendix 2). Concurrent with the County's assessment, there is a requirement for new Community Area to accommodate growth forecasted to 2051 and it is our opinion that the Subject Lands are ideally situated to satisfy a portion of this forecasted growth.

With regards to the County's consideration of growth options, it is our opinion that the Subject Lands represent an ideal location for a settlement expansion as they can achieve the Province's criteria for settlement area boundary expansion, are consistent with the *Provincial Policy Statement, 2020* ("PPS") and conform to *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (the "Growth Plan"). Furthermore, the Subject Lands are ideally suited to being able to deliver new housing quickly and thus assist the Province in delivering on its commitment to building 1.5 million homes within the next 10 years.

Accordingly, our client is requesting and we are recommending the Minister modify and approve the County of Simcoe Official Plan Amendment 7 by including the Subject Lands within the Bradford Settlement Area and redesignating those lands from "Rural" to "Settlements". See Appendix 3 for a reference to the necessary mapping.

In this regard, a conceptual development plan has been prepared for the Subject Lands that demonstrates that these lands can provide a mix and range of housing and community uses that will result in a more complete community in Bradford. Natural heritage features on the Subject Lands will be protected, and appropriate stormwater management controls can be achieved. Moreover, the Subject Lands can be developed at a minimum 55 residents and jobs per hectare (excluding lands for the Natural Heritage System), which exceeds the minimum County density target of 51 residents and jobs per hectare (and 55 residents and jobs per hectare for Bradford) recommended for new developments in the designated greenfield area in the County LNA. The Concept Plan is shown in Appendix 4 and will be updated to accommodate specific requirements of local agencies and authorities including, if necessary, the local school boards.

Response to Settlement Area Boundary Expansion Evaluation Criteria and Comment on the Official Plan Amendment

The Subject Lands in Bradford represent an excellent opportunity in the County to accommodate growth through the creation of a complete community, and to do so in a manner that can be serviced in a fiscally sustainable manner. In this regard, our team has reviewed the settlement expansion criteria established in the PPS and Growth Plan, as well as through the additional criteria established as part of Simcoe OPA 7. With respect to the settlement area boundary expansion request, please find attached the following supporting materials:

- Summary table of responses to each of the applicable policies derived from the PPS, the Growth Plan and Simcoe OPA 7 regarding settlement area boundary expansions (Appendix 2); and,
- The proposed mapping amendment to the County of Simcoe Official Plan, which shows the revised land use designation for the requested expansion areas as “Settlements” (Schedule 5.1), which is provided in Appendix 3.

The assessment of the evaluation criteria shows that the requested expansion is appropriate and consistent with/conforms to the applicable policies for the following reasons:

- Consistent with the conclusions of the County LNA, it is our opinion that there is a need to expand the settlement area to accommodate future residential development in Bradford (~449 hectares), which can be partly provided by the proposed expansion area in the southwestern portion of Bradford, which totals approximately 55ha of gross developable area;
- The proposed area for settlement expansion (or the Subject Lands), represents a logical area for urban expansion as it has the following characteristics:
 - Due to the size, the parcels can be planned as a complete community to accommodate the forecasted growth. This area will provide additional and diverse housing supply abutting the existing settlement area. Moreover, it can be comprehensively developed to provide for opportunities to address climate change goals, including promoting compact and energy-saving designs, denser developments, and transit-supportive and walkable communities to lower GHG emissions from buildings and transportation.

- The lands are located adjacent to the Bradford Settlement Area and are strategically located to provide a portion of the required Community Area land needs. Servicing infrastructure exists in close proximity to the Subject Lands and can be extended to the lands in a timely and efficient manner as outlined in the Preliminary External Servicing Investigation and Financial Review prepared by SCS Consulting (see Appendix 5)
- The development of the Subject Lands will continue the orderly development pattern of the Bradford Settlement Area and as such, will help utilize existing public facilities.
- The proposed expansion lands, as well as any required infrastructure and services, will be planned in a financially and environmentally sustainable manner over their full life cycle through robust technical studies in accordance with Provincial and local planning policies. The proposed expansion area in Bradford benefits from the location or expansion of existing infrastructure.
- Development on the lands produces minimal interface between urban and agricultural uses
- There are no specialty crop areas in the proposed expansion areas, nor are the lands suitable for agricultural uses.
- The proposed expansion is located outside of the Greenbelt

The proposed settlement area expansion represents an ideal opportunity to create a complete community and provide for an appropriate mix of housing and jobs. We believe this area is a logical and optimal location to accommodate a portion of the required settlement area expansion needed to achieve the growth forecasted in the County to 2051.

Expanding the settlement area to include the Subject Lands is essential to realizing a contiguous settlement structure that are bounded by arterial roads and surrounded by existing or planned residential neighbourhoods to the north and east.

Additional work has already been undertaken by the Bradford Highlands consultant team to identify the existing conditions and demonstrate the feasibility of the inclusion of Subject Lands into the settlement area boundary, including:

- Planning Opinion Report
- Preliminary Servicing Brief
- Preliminary External Servicing Investigation and Financial Review
- Environmental Impact Study
- Archaeological Assessment

These preliminary studies, which are provided in Appendix 5, have informed the responses to the evaluation criteria contained in Appendix 2 attached. Moreover, these studies, along with other documents, were submitted to the Town and County as part of a formal official plan amendment application to bring these lands within the urban boundary. Further details are provided in the following section.

Further studies will be completed through a future development review process. Moreover, inclusion of these lands can conform to the policies of the Provincial Policy Statement and Growth Plan.

We trust that this background work and these responses to the settlement area expansion criteria are helpful to the Province in its preparation and consideration of growth scenarios and demonstrates both the feasibility and priority for inclusion of this area for settlement expansion in Bradford into the Urban Area boundary.

BHJV Official Plan Amendment Applications

Concurrent to both the Town's MCR and the County's MCR, BHJV submitted Local Official Plan Amendment and County Official Plan Amendment applications to incorporate the Subject Lands into the settlement area boundary on the basis that there is insufficient land to accommodate the allocated population to 2031. It should be noted that BHJV is the only remaining appellant to the growth management Official Plan Amendment (OPA 25) that forms a part of the Town's new Official Plan.

It is our opinion that a settlement boundary expansion is required and that the Subject Lands represents a logical area for settlement area expansion. The Subject Lands are no longer suited for agricultural uses (being until very recently an operating golf course), it can be readily serviced with minimal infrastructure investment and it provides an opportunity to meet the diverse housing needs of the Town and County.

Through the development review process, we have received comments from the County on this application dated May 30, 2022 (attached as Appendix 6). We want to acknowledge these comments, which align with some of our previous conclusions. Of specific note, is the following comment:

"Through ongoing work relating to the subject property and the proposed COPA, County Planning staff have acknowledged that this site has attributes that lend itself toward the lands being given consideration for inclusion into the settlement area if supported by the land needs assessment of the MCR project. For instance, the subject lands are immediately adjacent to the settlement area of Bradford and are primarily designated 'Rural' in the County Official Plan. The Growth Plan identifies that when evaluating SABE's, the prime agricultural areas should be avoided where possible. This indicates that land designated 'Rural' would be preferred to consider for SABE's when compared to lands designated 'Agricultural' where this circumstance exists."

We agree with the County's recognition that the Subject Lands possess characteristics that would make it a logical area for a settlement area expansion.

BHJV Appeal of OPA 25

BHJV, the Town and the County signed Minutes of Settlement (see Appendix 7), which state that following the final outcome of the County's MCR (which may be phased) and any subsequent Growth Plan exercise, the Town/County/BHJV will take appropriate steps to bring the Town's Official Plan into conformity with the County Official Plan as it applies to the subject lands. As such, given that the County LNA has concluded there is a dire need for land to accommodate ground-related housing, we think this is an opportune time to request that

the Province include the Subject Lands within the urban settlement area utilizing the 2031 population, consistent with the direction provided in the Minutes of Settlement as noted below:

- *“the Ministry of Municipal Affairs and Housing has issued recent directives encouraging municipalities to conduct their MCRs in a phased manner in order to accommodate for growth in a more efficient and time-sensitive manner. Pursuant to this directive, County staff will be recommending to County Council that the County undertake a phased approach to their MCR and that Phase One should be an MCR of all currently designated primary settlement areas in the County’s Official Plan. The Bradford Settlement Area within Bradford West Gwillimbury (“BWG”) is one such primary settlement area.”*
- *“the County and Town Staff accept that under current policies, and according to currently accepted assumptions, the Bradford Settlement Area would qualify for additional population allocation, and a settlement area expansion as part of the proposed Phased MCR is a potential outcome.”*
- *“...the Parties acknowledge and accept that the location of the Subject Lands and the nearby existing full municipal servicing, make the Subject Lands one area that would be seriously considered as a candidate for inclusion in any Settlement Area Expansion.”*
- *“...As part of the phased MCR, the County, in consultation with the Town, will consider including the Subject Lands within the Bradford Settlement Area utilizing the 2031 population projections if appropriate justification exists to do so, (otherwise the 2041 planning horizon and population projections as provided for through the Growth Plan would be used as the basis to consider bringing the subject lands into the Bradford Settlement Area). If it is determined through the MCR exercise that the Subject Lands should be included within the Bradford Settlement Area using the 2031 population, and if doing so would result in the Subject Lands being urbanized more efficiently than would otherwise be the case, then the County agrees to give serious consideration to such an approach.” [emphasis added]*

The Minutes of Settlement indicate that the signatories (i.e. the County, the Town and BHJV) will act reasonably and in good faith when dealing with each other in these matters. As such, we understand the Subject Lands would be given particular and specific consideration in the County’s MCR process as it plans to undertake its assessment as to where settlement area boundary expansions should occur. These Minutes of Settlement, endorsed by the local municipality are a serious and important consideration indicating the acknowledgment from both the County and the Town as to the appropriate inclusion of the Subject Lands in the Bradford urban area. Our client is requesting and we are recommending that the Minister modify and approve COPA 7 as indicated earlier. In so doing the intent of the Minutes of Settlement will be given effect and the Subject Lands will, through a further local OPA process, eventually be included in the Bradford urban area.

Conclusion

We are pleased to see that the County has recognized through its work that a balanced approach to accommodating growth is required, including providing a sufficient land supply to accommodate ground-related housing options.

As such, we are requesting that given that there is proven insufficient land to accommodate the allocated population to 2051, that the Province, include the Subject Lands within the urban settlement area as we believe these lands represent the most logical area for new residential use.

Our client is requesting, and we are recommending that the Minister modify and approve the County of Simcoe Official Plan Amendment 7 by including the Subject Lands within the Bradford Settlement Area and redesignating it to “Settlements”. See Appendix 3 for a reference to the necessary mapping.

The Subject Lands represent a logical area for residential use (as further confirmed with the County) and are required to achieve the population assigned to the Town by the County. The Subject Lands are no longer suited for agricultural uses. The Subject Lands can be fully serviced with minimal infrastructure investment, and this provide an immediate opportunity to respond to the diverse housing needs of the Town and County.

In conclusion, we thank you for the opportunity to provide input into the County’s MCR process. If you have any questions or wish to discuss this letter, please do not hesitate to contact the undersigned at any time.

Yours very truly,
Malone Given Parsons Ltd.



Don Given, MCIP, RPP

cc: *Client*

Atth: *Appendices*