



January 30, 2023

Julianna Zhuo  
Municipal Services Office – Central Ontario  
16<sup>th</sup> floor  
777 Bay Street  
Toronto, ON M7A 2J3

Dear Julianna,

**Re: *Response to the Province's request for comments on the County of Simcoe Official Plan Amendment No. 7***

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Thank you for the opportunity to comment. This letter is in response to the Province's request for comments on the County of Simcoe Official Plan Amendment No. 7 (the "OPA 7"). We are the planning consultants for Bond Head Properties Inc. c/o DG Group who are the owners of approximately 1,100 hectares of land surrounding Bond Head in the Town of Bradford West Gwillimbury. We are writing to express our opinion regarding an urban boundary expansion around Bond Head.

For the reasons outlined here, it is our opinion that OPA 7 should be revised to provide for a significant expansion to Bond Head, given the growth context in the County, Greater Golden Horseshoe (the "GGH"), and province, and the ability for Bond Head to accommodate a significant amount of growth and its opportunity to evolve into a complete community. In this regard, we respectfully request that the OPA 7 be updated as per the recommendations outlined herein.

### **Growth Context**

Ontario's population is projected to increase by 35.8 percent, or almost 5.3 million people, over the next 26 years. This projected growth comes after a significant growth period that began in the early 2000's, which saw Ontario's population increase from approximately 10 million people to approximately 15 million people. Within Ontario, the Greater Golden Horseshoe (the "GGH") is one of the most dynamic and fast-growing regions in North America and like Ontario has seen a significant population increase since the early 2000's and is projected to accommodate the majority of

Ontario's growth over the next 28 years, accounting for a minimum of 14,870,000 people and 7,010,000 jobs.

The historical and projected growth in Ontario, and especially the GGH, has created a housing shortage issue in the province and region.

In response to the growth and projected growth in the GGH, the province created the Growth Plan for the Greater Golden Horseshoe (the "**Growth Plan**") in 2005 and made subsequent updates in order to provide a provincial planning policy framework that coordinated growth efforts and emphasized the need to plan for the population and employment growth that is projected for the GGH. This includes the requirements for municipalities to update their Official Plans to plan for how they will accommodate the projected minimum (**emphasis added**) growth targets.

The province also introduced the *More Homes, Built Faster: Ontario's Housing Supply Action Plan 2022-2023* (the "**Housing Action Plan**") to specifically combat the lack of housing in the province. The Housing Action Plan culminated in the provincial government's passage of the *More Homes for Everyone Act, 2022* and the *More Homes Built Faster Act, 2022*, which saw updates to provincial legislation to advance housing projects in Ontario.

Within this context, it is clear that all of the municipalities within the GGH should be bold in how they plan to accommodate growth to 2051, including the County of Simcoe.

### **Simcoe County Official Plan Amendment No. 7**

On August 9, 2020, the Council for the County of Simcoe adopted OPA 7 as part of its Municipal Comprehensive Review. OPA 7 updates the existing County Official Plan (the "**County OP**") and provides growth management policies for accommodating the County's projected growth to 2051. With respect to Bradford West Gwillimbury and Bond Head specifically, OPA 7 provides the following:

- A projected population growth of 38,980 people between 2021-2051 for Bradford West Gwillimbury (the "**BWG**").
- An intensification target of 42% for BWG.
- A designated greenfield area (the "DGA") target of 55 residents and jobs combined per hectare.

- A minimum DGA land need for BWG of **449.1 gross hectares** to accommodate community uses.

Based on the above, it is our opinion that OPA 7 is not ambitious enough in its expansion goals and should provide sufficient capacity to accommodate growth beyond the minimum targets identified. More specifically, the County's LNA and OPA 7 merely seek to accommodate the minimum density outlined in the Growth Plan. In our opinion, this is short-sighted and does not recognize the significant amount of growth projected for the GGH, nor does it seek to address the housing issues that are facing the County, GGH, and province. More specifically, the quantum of growth that's planned for the GGH is enormous, which calculates to approximately 170,000 new people annually for the next 29 years, and any potential increase would not be minor and instead would put additional pressures on the GGH municipalities.

In this regard, OPA 7 does not account for the potential for the County, and specifically BWG to exceed the forecasted minimums. In our opinion, given the historical growth trend and lack of housing issues, the County and all other GGH municipalities should be aggressive and target more growth in order to prepare for growth instead of responding to it. This is particularly important as it relates to the arduous process for expanding and preparing land for development.

In our opinion, BWG and specifically Bond Head represent an opportunity for the County to add more land to accommodate the growth and provide some housing relieve for the GGH, which has an identified need.

### **Why Expand Bond Head**

A settlement area expansion for Bond Head is appropriate, will address housing supply issues in the County, and conforms to planning policy objectives articulated in the Provincial Policy Statement (the "PPS"), the Growth, the County OP, and the Bradford West Gwillimbury Official Plan (the "BWG OP").

#### *Housing Supply*

A settlement area expansion for Bond Head can help ensure Simcoe County will be able to maintain, at all times over the next 30 years, sufficient supply of serviced land to meet projected housing needs. Simcoe County is large and extremely complex, with ongoing and shifting environmental and servicing issues that affect, from time to time,

the supply of serviced land available for development in different parts of the County. An expanded Bond Head settlement area will help provide flexibility for local decision makers to respond to housing need and market demand.

Both the PPS and Growth Plan emphasize the need to have a sufficient housing supply that reflects market demand and what is needed in local municipalities. It is in this regard that a wide range and mix of options are needed to ensure that the County can maintain, at all times, sufficient supply to meet market demand. In our opinion, allocating a significant share of the County's population growth to BWG would help ensure sufficient housing supply for the County in a municipality where the market demand for housing is strong, there is potential for substantial local employment growth and excellent access to the 400 series of highways. An expansion to the Bond Head Settlement Area will widen the range of housing options available to meet the housing needs of current and future residents.

OPA 7 has allocated a projected population growth of 38,980 people between 2021-2051 for BWG, where 42% (16,371) is planned to be accommodated through intensification. Bond Head does not have a *delineated built boundary* and, as such, all of the intensification population will be accommodated in Bradford, which does have a *delineated built boundary*. In this regard, it is our opinion that the majority of BWG's DGA lands should be utilized for an expansion to Bond Head.

It is also our opinion, that the minimum DGA lands for the County and especially BWG should be increased beyond the minimums established in OPA 7.

#### *Infrastructure Support*

Provincial planning policy, namely the Growth Plan and PPS, require the integration of land use planning with investment in infrastructure. For example, Growth Plan Policy 2.2.8.3(a) states that there is to be "sufficient capacity in existing or planned infrastructure and public service facilities" to accommodate the expansion which includes (but is not limited to) consideration of sewage and water systems, transit and transportation corridors and facilities, police and fire protection, and health and educational programs. Similarly, Growth Plan Policy 2.2.8.3(b) requires that the "infrastructure and public service facilities needed would be financially viable over the full life cycle of these assets". It is within this context that an expansion to Bond Head is not only a viable option to accommodate the County's projected growth to 2051, but it is an appropriate one given the ability to capitalize on existing infrastructure and the ability of the County and Town to do so in a financially viable way, which aligns with the provincial policy objective of optimizing the use of existing and planned

infrastructure. Furthermore, Policy 2.2.8.3 of the Growth Plan requires that settlement area boundary expansions occur at the most appropriate location based on the feasibility of, among other elements, the availability of sufficient capacity in existing or planned infrastructure.

SCS Consulting (engineering consultant) has analyzed the existing infrastructure in Bond Head and concluded the following:

- A settlement area boundary expansion to Bond Head would optimize the use of existing and planned sanitary infrastructure and additional capacity can be provided in a cost-effective manner.
- Existing and planned (as part of the Town's current Master Servicing Plan and DC By-law) water infrastructure in Bond Head can provide sufficient allocation, supply, storage and fire flows for an expansion of **7,000 people immediately**. This is in addition to other expansion populations of Bradford and the OPA 15 Employment lands.
- The existing sanitary infrastructure in Bond Head is significantly oversized and can easily accommodate expansion flows. In this regard, the existing sanitary force mains are oversized and the existing sanitary pumping station can accommodate an additional population (beyond its planned population) of 4,000 people. Additional upgrades can accommodate an increased population of up to **12,000 in the short term** and much more with key infrastructure upgrades.

Based on the foregoing, it is our opinion that an expansion to Bond Head in order to accommodate some of the County's growth to 2051 would take advantage of existing infrastructure in Bond Head, conforms to the provincial planning policy and would do so in a financially viable manner.

#### *Making Bond Head a Complete Community*

Bond Head has an anticipated population of approximately 4,400 people (as per Policy 6.1.3.2 of the Bond Head Secondary Plan) and includes a land use plan based on a quadrant basis with existing heritage residential and new low and medium density residential areas (the majority of which is low density) in each of the four quadrants. Parks are interspersed throughout the four quadrants. In addition, the land use plan recognizes the existing two churches and two employment properties and plans for a small village core area at the intersection of County Roads 27 and 88/7<sup>th</sup> Line and one new elementary school. The majority of the new low and medium density residential areas (1,058 of the 1,500 anticipated new residential units) are owned by Bond Head Properties Inc. c/o DG Group and have received draft plan of subdivision approval, while some (335 units) have been registered and are currently under construction.

The Growth Plan defines a **Complete Communities** as:

*Places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living, including an appropriate mix of jobs, local stores, and services, a full range of housing, transportation options and public service facilities. Complete communities are age-friendly and may take different shapes and forms appropriate to their contexts.*

In our opinion, there is an opportunity to make Bond Head a more complete community, one that provides access to most of the necessities for daily living, a full range of housing options, transportation options and public service facilities. In this regard, there is a current lack of existing and planned commercial amenities and public service facilities (day cares, secondary schools, community centres, etc.) within Bond Head and requires inhabitants to travel for these daily living necessities. In addition, the majority of the existing and planned housing is single detached dwelling and does not provide for a full range of housing types and tenures. Finally, the current Simcoe County Linx Transit service is limited and, although it connects Bond Head to New Tecumseth and Bradford, it does it along one corridor (County Road 88/8<sup>th</sup> Line) and with limited hours of operation (5:20am to 5:20pm).

Adding lands and growth to Bond Head would have the effect of:

- Assisting the Province in meeting its housing supply objectives.
- Accommodating some of the County and Town's forecasted growth.
- Providing more housing and a full range of housing options for Bond Head and BWG beyond the existing and approved single and semi-detached housing.
- Locating new housing near existing and planned employment uses in the Highway 400 - OPA 15 Employment lands.
- Making vacant commercial lands in Bond Head feasible with greater population in its catchment.
- Creating new commercial lands that can accommodate daily amenities, such as a grocery store, new retail, coffee shop, personal services, etc.
- Accommodating new institutional and public service facilities for Bond Head, including a high school, new elementary schools, community centre, library, day cares, etc.
- Adding transit users and increasing ridership to Bond Head that will make existing transit more viable and allow for transit improvements.

- Delivering planned infrastructure projects including the Bradford Bypass.

### **Orderly Development & Community Structure**

As you are aware, Bond Head Properties Inc. c/o DG Group's land holdings outside the current Bond Head Boundary represents a total gross area of 629.0 hectares (471.25 hectares of net area, less NHN, Woodlands and Regulated Area). Furthermore, given that such a large land holding is in one ownership, it will allow for efficient expansion of infrastructure and public service facilities without the need for cost sharing and other multiple proponent issues. I will also allow for the delivery of much needed housing immediately and subject to any required approvals.

In our opinion, expanding Bond Head would represent an orderly expansion, given infrastructure considerations and proximity to other urban areas (i.e., Highway 400 Business Park and Bradford). The attached package (see **Attachment 1**) illustrates the existing Bond Head community structure and community facilities, as well as an urban expansion concept plan. The concept plan includes the following:

- Protection of the Natural Heritage System.
- A new collector road that would allow for a transit loop throughout Bond Head.
- New community service facilities including a new high school, elementary schools, community centre, parks, day cares, fire station, etc.
- New commercial and mixed-use areas that can accommodate daily living amenities for residents including a grocery store, retail shops, restaurants, personal services, and offices.
- New residential uses including higher density uses along higher order corridors to accent the existing low-density housing with townhouses, apartments, seniors' residences, retirement homes, and other forms of housing to provide a full range of housing for the community.
- New trails and active transportation connections throughout the community along natural heritage boundaries and connected to commercial and transit amenities.
- Gateways that will signal the entrance to the community of Bond Head at County Road 88, County Road 27, and Line 7.

### **Request**

Based on the foregoing, it is our opinion that OPA 7 should be bolder and seek to accommodate growth beyond the Growth Plan minimums. More specifically, OPA 7 should be revised to specifically allow for an urban boundary expansion Bond Head

as is illustrated in **Attachment 1**, since it is appropriate, desirable, conforms to the PPS, Growth Plan, County OP and BWG OP, will provide a consistent housing supply for the County to accommodate its forecasted growth, has the infrastructure support to implement an expansion, is financially responsible, and will make Bond Head a more complete community.

An expansion to Bond Head will accelerate housing in the County and bring housing on-line immediately, given the existing servicing capacity. It also provides the opportunity to accommodate some of the County's growth in the medium and long term and within the timeline of the Growth Plan (to 2051) with minor infrastructure upgrades. More importantly, growth in Bond Head will make it more transit supportive and improve its existing transit services and provide new commercial amenities and public service facilities to reduce travel and shift transportation modes to transit, walking and cycling. Finally, the proposed expansion will allow for the orderly and logical development of the community and connect residential and mixed use areas to the existing BWG employment lands along Highway 400.

For these reasons and more, it is our opinion that an expansion to Bond Head should be captured in OPA 7, and it should include the following:

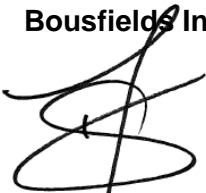
- A settlement area expansion to Bond Head of the entire 629.0 hectares.
- The expansion should be generally aligned with the concept plan illustrated in the attached package.
- The settlement area expansion should include a policy framework that requires that an expansion to Bond Head:
  - Protects the natural heritage system.
  - Is planned as a complete community.
  - Accommodates a full range of housing options.
  - Delivers new public service facilities including a new high school, community centre, parks, etc.
  - Provides new commercial amenities including a grocery store, retail shops, restaurants, personal services, etc.
  - Includes a road system that can accommodate transit improvements.
  - Orderly development policies that will ensure certain infrastructure and community services are delivered at certain stages of development.

- The requirement to capitalize on existing infrastructure servicing capacity immediately and within a reasonable timeline to assist in addressing the housing issues in the County, GGH and province.

Should you require any additional information or clarification, please feel free to contact the undersigned.

Respectfully Submitted,

**Bousfields Inc.**



David Falletta MCIP, RPP

DF/rn:jobs

cc. Bond Head Properties Inc. c/o DG Group



# Urban Expansion Concept Plan

## Bond Head Expansion

Bond Head, ON

### Prepared For

Bond Head Properties Inc. c/o DG Group

January 2023

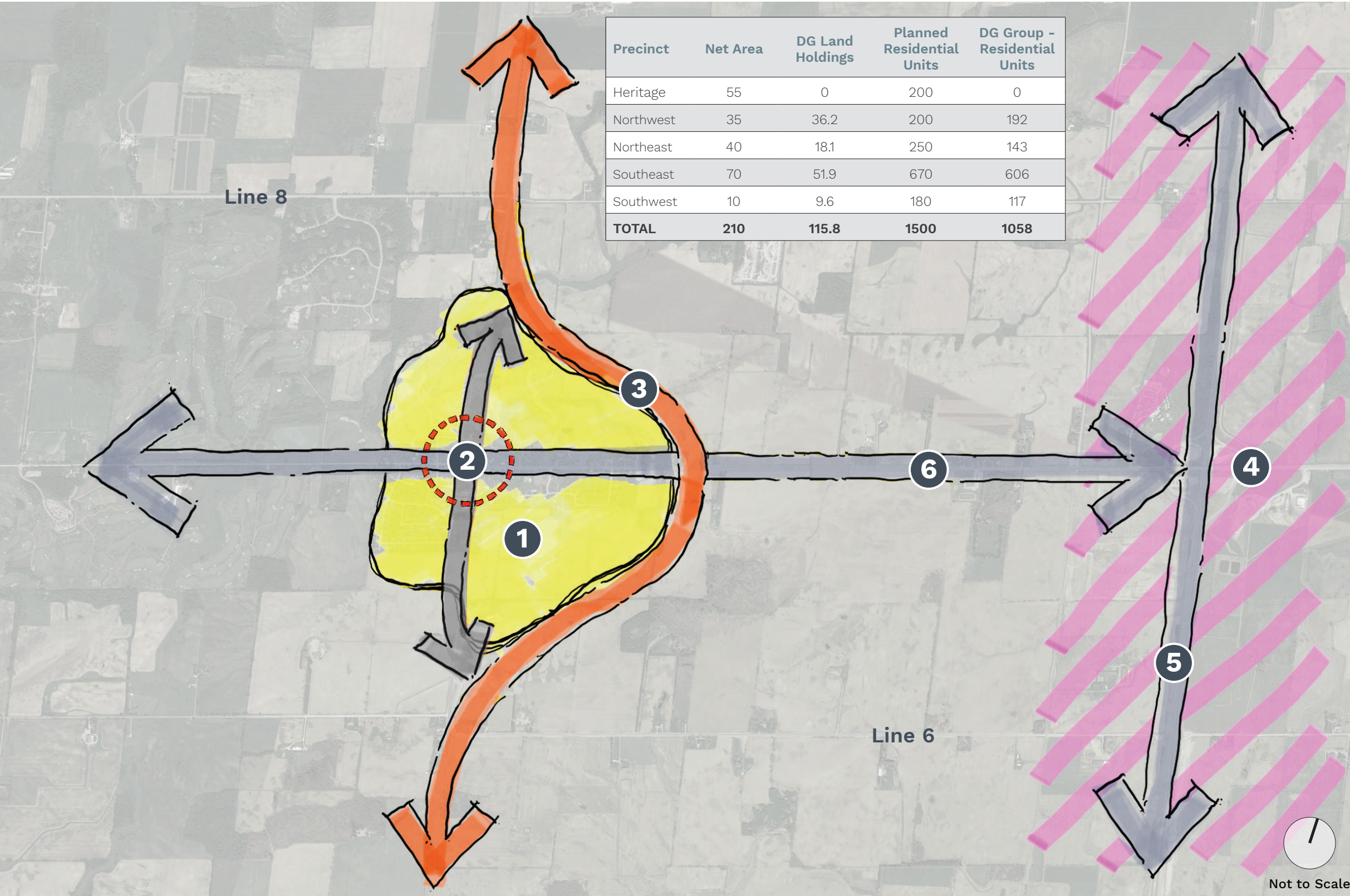
# CONTEXT

## Immediate Area



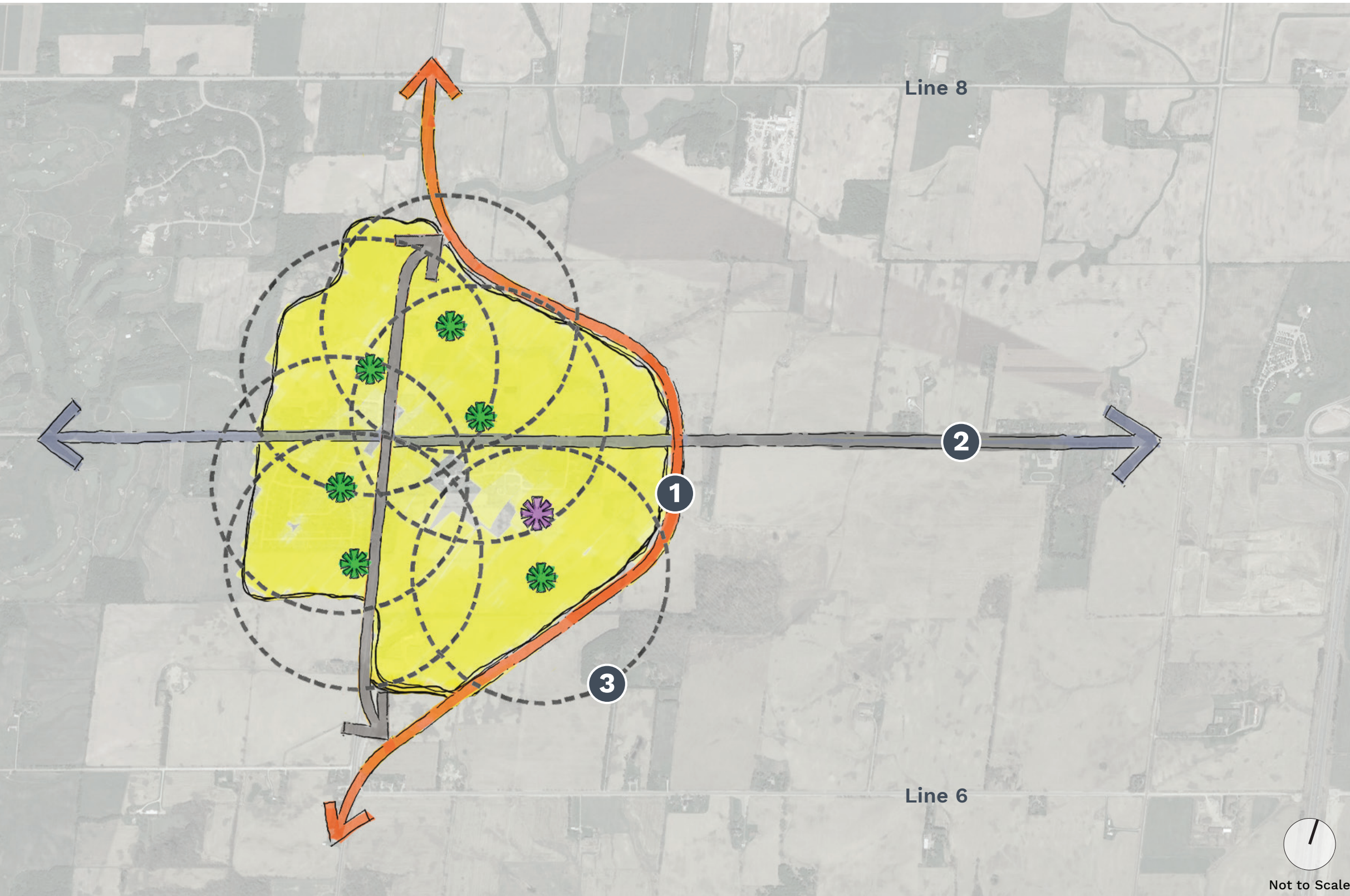
- 1** Bond Head Community
- 2** The Club at Bond Head (Golf Course)


## Existing Community Structure



- 1 Existing Bond Head Urban Area
- 2 Local Commercial Uses
- 3 Planned Bradford By-pass
- 4 Highway 400 Employment Lands
- 5 Highway 400
- 6 County Road 88


## Existing Community Facilities



 Existing Bond Head Urban Area

 Parks

 Elementary School

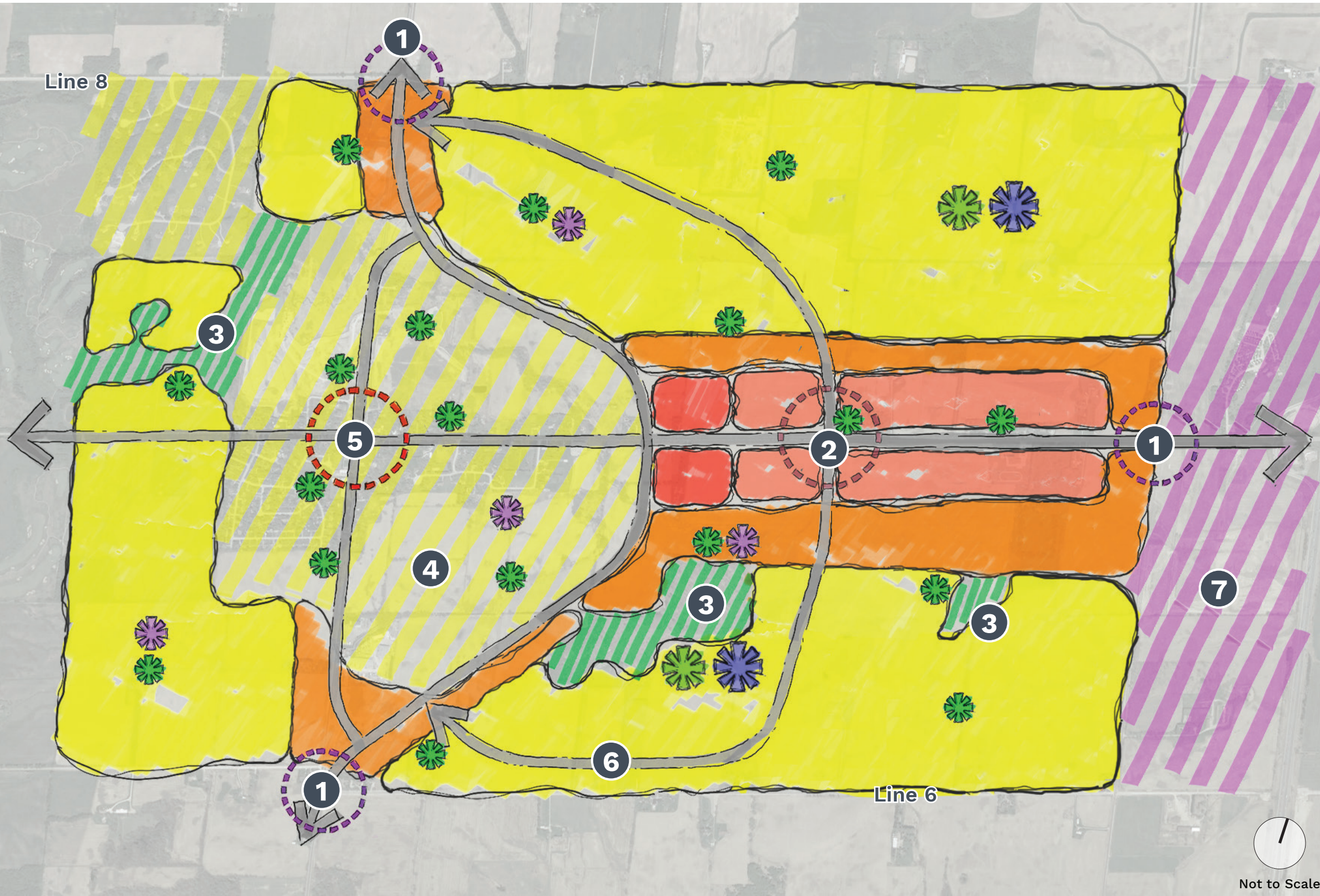
 Planned Bradford By-pass

 County Road 88

 500-metre Radius Around Park

# URBAN EXPANSION CONCEPT

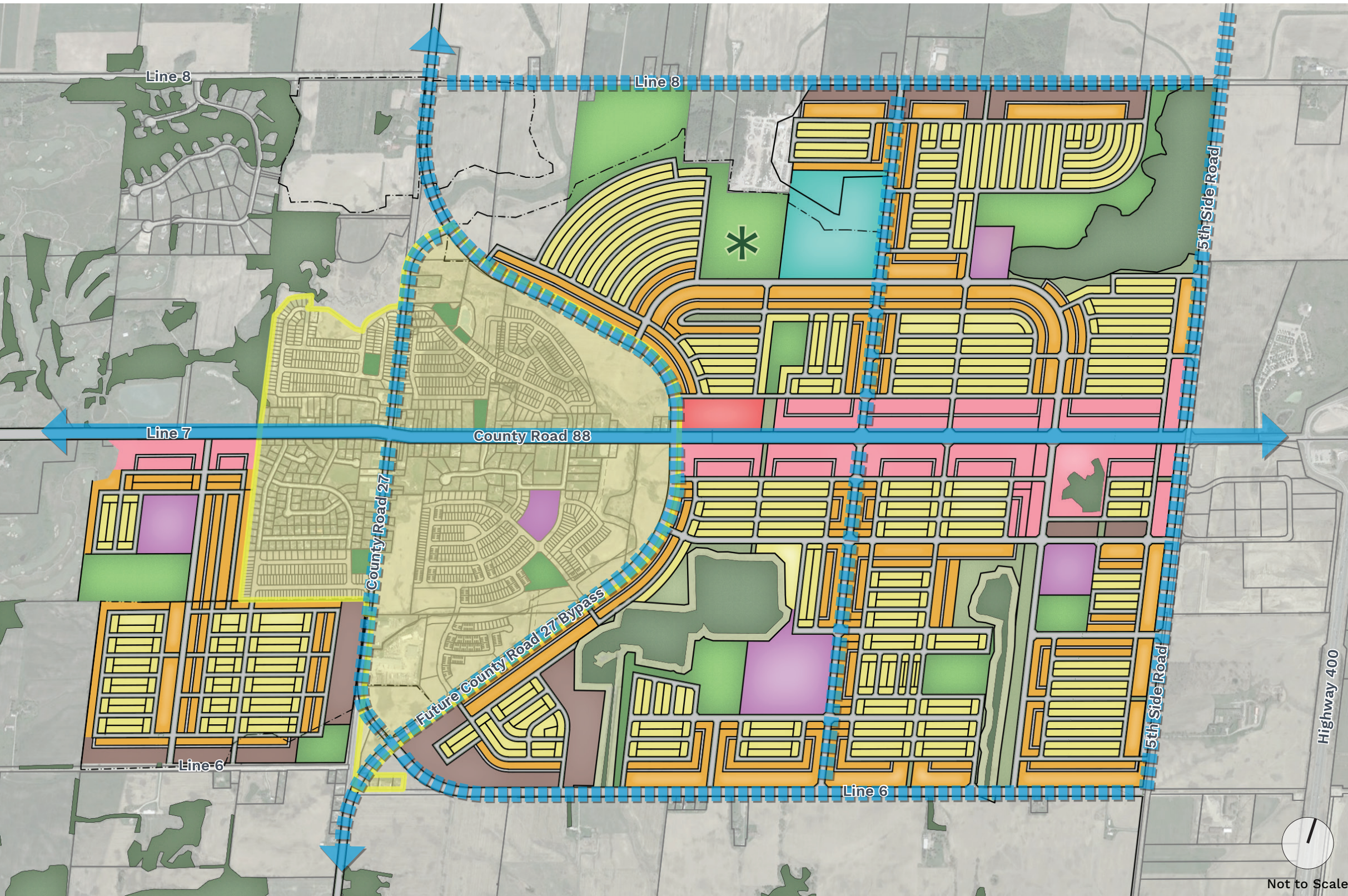
## Bond Head Expansion Land Use Structure



- Mixed Use
- Medium Density Residential
- Low Density Residential
- Commercial
- ★ Parks
- ★ Community Park
- ★ Elementary School
- ★ Secondary School
- 1** Gateway
- 2** Community Node
- 3** Woodlot
- 4** Existing Bond Head Urban Area
- 5** Local Commercial Uses
- 6** New Collector Road and Cycling Spine
- 7** Highway 400 Employment Lands

# URBAN EXPANSION CONCEPT PLAN

## Bond Head Expansion Land Use Demonstration



- Bond Head Community Boundary
- Mixed Use
- High Density Residential
- Medium Density Residential
- Low Density Residential
- Commercial
- ✱ Community Park
- Parks
- Open Space
- Community Hub
- Schools
- Existing Transit Line
- Proposed Transit Line