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SUBMITTED VIA ERO POSTING

Files: P-2687
P-3266
P-3312

February 2, 2023

Municipal Services Office - Central Ontario
16th floor
777 Bay Street
Toronto, ON
M7A 2J3
Canada

Attention: Julianna Zhuo
Senior Planner (Acting) | Community Planning & Development (East) Unit,
Municipal Affairs and Housing

RE: ERO Number 019-6113
Ministry Reference Number 43-OP- 221936
Approval of the County of Simcoe Official Plan Amendment No. 7

KLM Planning Partners Inc. is the land use planning consultant for GB (Bradford) Inc., GB (Bradford 2) Inc. and GB (Bradford 3) Inc. (the “client”), the owners of 2944 5th Line, 3174 5th Line and 2572 Sideroad 10 respectively in the Town of Bradford West Gwillimbury (the “Town”). The lands are identified on a context map attached to this letter, and are generally described as follows:

1. 2944 5th Line - The lands are approximately 40 hectares (100 acres) in size and are bounded by 5th Line in the south, Bradford Highlands Golf Club in the east, a mid-concession lot line between Lots 11 and 12, Concession 5 in the west and a mid-concession lot line between Concessions 5 and 6 in the north.
2. 3174 5th Line - The lands are approximately 34.21 hectares (84.53 acres) in size and are bounded by 5th Line in the south, 10th sideroad in the east, a mid-concession lot line between Lots 9 and 10, Concession 5 in the west and a mid-concession lot line between Concessions 5 and 6 in the north.

3. 2572 Sideroad 10 - The lands have an area of 14.164 hectares (35.00 acres) and are generally located on the west side of Sideroad 10, north of Line 6 and south of County Road 88/Holland Street.

Our clients are committed to delivering needed housing for both the County and the Town, and we have actively monitored the County of Simcoe (“**County**”) Municipal Comprehensive Review (“**MCR**”) and Land Needs Assessment (“**LNA**”) as it relates to the development of the above noted lands. We have previously provided comments to the County with respect to the County’s MCR and LNA, requesting the consideration of our client’s lands for a future expansion to the Bradford Settlement Area Boundary. We have also provided a detailed submission to the Town identifying a potential expansion to the Bradford Settlement Area Boundary inclusive of our clients’ lands and certain lands adjacent thereto. The following summarizes the letters identified above in relation to our client’s lands which have also been attached for reference:

- **May 28, 2021** – Letter to the County in relation to 2944 5th Line requesting that the County allocate a sufficient quantum of growth to the Town to permit the expansion of the Bradford Settlement Area Boundary to include our clients’ lands as Community Area Land;
- **May 28, 2021** – Letter to the County in relation to 3174 5th Line requesting that the County allocate a sufficient quantum of growth to the Town to permit the expansion of the Bradford Settlement Area Boundary to include our clients’ lands as Community Area Land;
- **November 11, 2021** – Letter to the County in relation to 2944 5th Line providing comments on the draft LNA, supported by a detailed Boundary Expansion Study completed by UrbanMetrics Inc.;
- **November 11, 2021** – Letter to the County in relation to 3174 5th Line providing comments on the draft LNA, supported by a detailed Boundary Expansion Study completed by UrbanMetrics Inc.;
- **December 8, 2021** – Letter to the County in relation to 2572 Sideroad 10 requesting that the County allocate a sufficient quantum of growth to the Town to permit the expansion of the Bradford Settlement Area Boundary to include our clients’ lands as Community Area Land.
- **July 14, 2022** – Letter to the Town identifying a potential settlement area expansion for the Bradford Settlement Area Boundary in relation to our clients’ lands and certain lands adjacent thereto, including an evaluation of settlement area expansion policies from A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020 (“**Growth Plan**”) and the Provincial Policy Statement, 2020.

Proposed Settlement Area Expansion

As identified in our July 14, 2022 letter to the Town, the Settlement Area of Bradford is identified in the Growth Plan, the County Official Plan, 2016 (“**County OP**”) and the Town’s Adopted Official Plan (“**Adopted OP**”) as a Primary Settlement Area. The Growth Plan establishes that municipalities with Primary Settlement Areas are required to direct a substantial portion of forecasted growth to Primary Settlement Areas. As a result, the Town is required to direct a substantial amount of allocated growth to Bradford.

The conceptual settlement area boundary expansion (“**Proposed Expansion**”) would provide for a logical expansion to the Bradford Settlement Area Boundary, is served by an existing network of high order transportation corridors including 10 Sideroad, 5th Line, Line 6, County Road 88/Holland St. W. and 8th Line, is in close proximity to Highway 400 including interchanges at County Road 88/Holland St. W. and 5th Line, and provides a series of opportunities for integration with developed areas within Bradford.

A concept plan identifying the potential development of the lands within the Proposed Expansion is provided as Attachment No. 8, and it is noted that these lands could accommodate approximately 8,500 residential units which would be refined through detailed secondary planning through the confirmation of any necessary public service facilities and infrastructure. The Proposed Expansion would enable the Town to comprehensively plan for a multitude of regional community infrastructure and public service facilities to support the ongoing development of Bradford as a complete community. Community infrastructure and public service facilities can be difficult to implement when not considered on large contiguous parcels of land, where the Town is able to leverage the broad interests of several landowners and stakeholders including the County, Province of Ontario, school boards, conservation authorities, etc.

Planning for a large-scale expansion as identified in the Proposed Expansion also allows the Town to address the following:

- the provision of public transit, pedestrian and cycling networks;
- the provision of public and private services and the detailed approach to stormwater management;
- protection and enhancement of the Natural Heritage system, including the detailed evaluation and demarcation of features and buffers;
- the locations of cultural heritage features, including built heritage and potential archaeological resources and proposed approaches to conservation and or enhancement;
- the proposed implementation of sustainable development policies; and,
- development phasing to align growth with the provision of infrastructure.

RAND Engineering Corporation (“**RAND**”) prepared a Municipal Servicing Assessment in connection with our letter to the Town dated July 14, 2022, which evaluated municipal water, wastewater and stormwater systems. A revised Municipal Servicing Memorandum (“**Servicing Memo**”) has been prepared by RAND dated January 31, 2022 which provides a servicing

assessment of the Proposed Expansion at a conceptual level to demonstrate that with certain improvements to the existing municipal infrastructure, the lands are serviceable.

The Servicing Memo, which is attached herein, identifies a conceptual wastewater sewer system conveying flows to the existing Bradford Wastewater Treatment Plant (WWTP), located at Dissette Street; a proposed water servicing and distribution system connected to a network of the existing municipal watermains located north and east of the Proposed Expansion; and, seven (7) stormwater management facilities to control post-development flows with drainage outlets conforming to existing drainage conditions to satisfy water quality, erosion and quantity control, water balance and phosphorus reduction objectives for the West Holland River Subwatershed. The Servicing Memo notes that further detailed study and assessment will be required to determine the preferred route of the wastewater system for the subject lands and identify new additions and upgrades to the existing water and wastewater systems to provide additional required capacity to service the Proposed Development.

The Servicing Memo includes a preliminary cost assessment of the major wastewater and water servicing infrastructure required for the Proposed Expansion based on the conceptual details noted above. The total estimated cost of the sanitary pumping stations, sanitary sewers, forcemains and trunk watermains along the proposed collector roads is approximately \$54,000,000.00.

Pursuant to the above, we would respectfully request that the Bradford Settlement Area Boundary be expanded to include the Proposed Expansion as the Province considers the approval of COPA 7, to support the urgent need for housing in the Town, County and Province.

We would be pleased to meet with Provincial staff to discuss the contents of this letter. Should you have any comments or questions, we can be reached at kmackinnon@klmplanning.com and tschilling@klmplanning.com.

Yours very truly,

KLM PLANNING PARTNERS INC.



Keith MacKinnon, MCIP, RPP
Partner







Tim Schilling, MCIP, RPP
Senior Planner

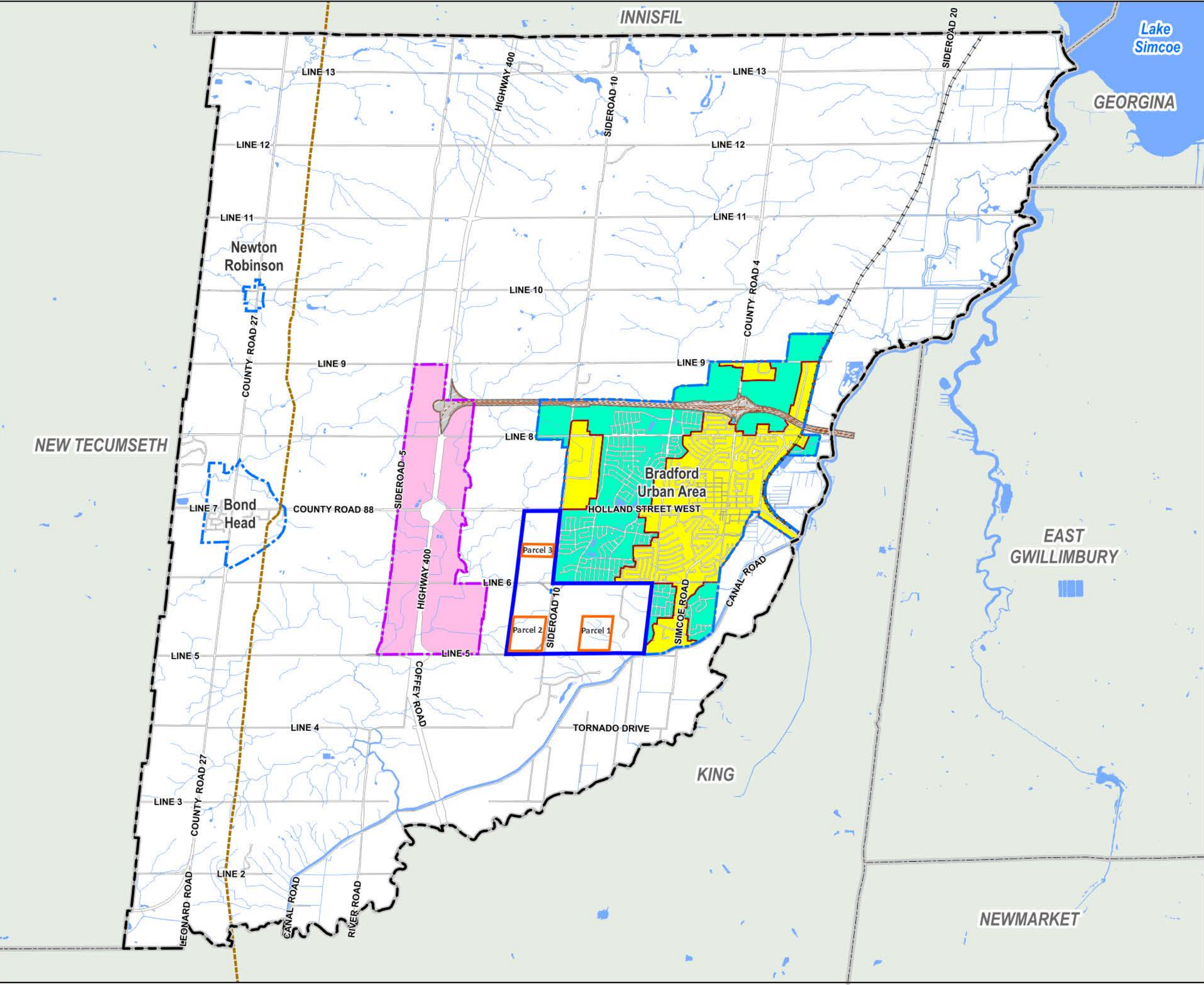
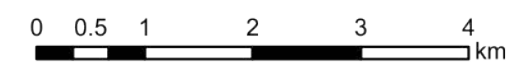
cc: Client

Attachments (8)

**SCHEDULE A
 URBAN STRUCTURE AND
 BUILT BOUNDARY**



-  Bradford West Gwillimbury Boundary
-  Settlement Area Boundary
-  Highway 400 Employment Lands Boundary
-  Roads
-  Highway 400 - 404 Link (Future)
-  Railway
-  Trans Canada Pipeline
-  Watercourses
-  Delineated Built Boundary
-  Designated Greenfield Area
-  Highway 400 Employment Lands
-  Proposed Expansion
-  Parcels





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SENT VIA EMAIL

File: P-2687

May 28, 2021

The County of Simcoe
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, Ontario
L9N 1X6

Attention: Mr. John Daly, County Clerk

**RE: County of Simcoe Municipal Comprehensive Review, Special Meeting
GB (Bradford) Inc.
2944 5th Line
Town of Bradford West Gwillimbury**

Dear Mr. Daly,

KLM Planning Partners Inc. is the land use planning consultant for GB (Bradford) Inc. (the "client"), the owners of 2944 5th Line in the Town of Bradford West Gwillimbury ("Town"). The lands are approximately 40 hectares (100 acres) in size and are bounded by 5th Line in the south, Bradford Highlands Golf Club in the east, a mid-concession lot line between Lots 11 and 12, Concession 5 in the west and a mid-concession lot line between Concessions 5 and 6 in the north ("Subject Lands"). A context map identifying the location of the Subject Lands is included herein as Attachment No. 1.

The Subject Lands are currently designated "Agricultural" on Schedule 'A' to the Town Official Plan, 2002 ("Town OP") and "Agricultural" on Schedule 5.1 to the County of Simcoe Official Plan, 2016 ("County OP"). The Subject Lands are also proposed to be designated 'Agricultural' on Schedule 'B' to the Town's New Official Plan Adopted by the Town on March 2, 2021 ("New Town OP").

On April 29, 2021, the County of Simcoe ("County") issued a Notice of Statutory Special Meeting in relation to the County Municipal Comprehensive Review ("MCR"). The purpose of the Special Meeting is to discuss the MCR process and to assist in determining the updates that may be required to the County OP under Section 26 of the Planning Act to bring it into conformity with A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020 ("Growth Plan").

The Growth Plan provides population and employment growth forecasts to the County to 2051. The effect of these new forecasts is that the County is directed to plan for a population of 555,000 and 198,000 jobs by 2051; growth of 139,000 people and 66,000 jobs from the 2031 forecast used as the basis for the County OP and the New Town OP.

In accordance with the policies of the County OP, expansions to Settlement Area Boundaries can only be undertaken through a MCR (save and except for 40-hectare expansions as permitted by the Growth Plan). As part of the MCR, the County will be conducting a review of the population and employment forecasts to 2051, including the distribution of such to each of the County's local municipalities, including the Town.

It is acknowledged that the Settlement Area of Bradford within the Town is identified in both the Growth Plan and the County OP as a Primary Settlement Area. Pursuant to the Growth Plan, Municipalities with primary settlement areas will, in their official plans and other supporting documents:

- a) identify primary settlement areas;
- b) identify and plan for strategic growth areas within primary settlement areas;
- c) plan to support the achievement of complete communities within primary settlement areas; and,
- d) 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 and vibrant places that support walking and cycling for everyday activities and are transit-supportive.

Section 6.3.4 of the Growth Plan further states that the Town will direct a significant portion of population and employment growth forecasted to the applicable primary settlement areas.

In order for the Town to achieve the objectives of the Growth Plan as it relates to primary settlement areas noted herein, a significant amount of the County's overall growth to 2051 should be directed to the Town. As such, we are respectfully requesting that the County allocate a sufficient quantum of growth to the Town to permit the expansion of the Bradford Settlement Area Boundary to include our clients' lands as Community Area Land.

On behalf of our client, while conducting the ongoing MCR, we ask that the MCR Project Team consider the Subject Lands for future expansions to the Settlement Area of Bradford to support the ongoing and desirable growth of the County. We would appreciate the opportunity to participate in discussions related to the MCR and may wish to make further detailed submissions in relation to subsequent reports related to this process.

Further, we respectfully request notice of any future reports and/or public meetings and consultations regarding the MCR, and further that we receive notice of any decision of County Council.

Yours very truly,

KLM PLANNING PARTNERS INC.



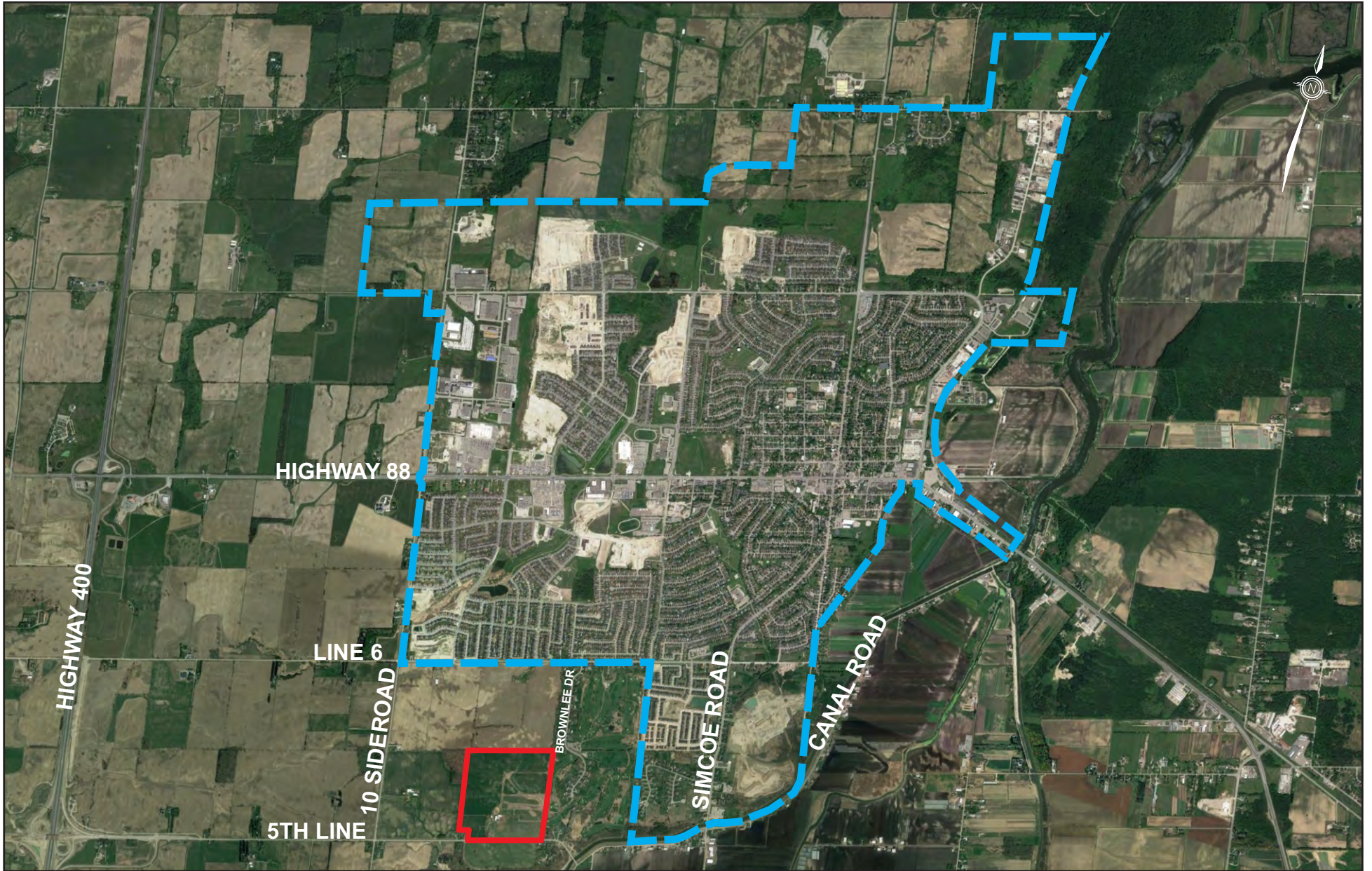
Keith MacKinnon, MCIP, RPP
Partner



Tim Schilling, MCIP, RPP
Senior Planner

Copy: David Parks, Director of Planning, Economic Development, Transit and Airport Services, County
Dan Amadio, Manager of Planning (South/East), County
Alan Wiebe, Manager of Community Planning, Town of Bradford West Gwillimbury
Melrose Properties Inc.

CONTEXT MAP



Subject Lands

Part of Block 36, Plan 51M-221
and Part of Lot 12, Concession 5
Town of Bradford, West Gwillimbury
County of Simcoe



Bradford Settlement Area Boundary

NTS





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SENT VIA EMAIL

File: P-3266

May 28, 2021

The County of Simcoe
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, Ontario
L9N 1X6

Attention: Mr. John Daly, County Clerk

**RE: County of Simcoe Municipal Comprehensive Review, Special Meeting
GB (Bradford 2) Inc.
3174 5th Line
Town of Bradford West Gwillimbury**

Dear Mr. Daly,

KLM Planning Partners Inc. is the land use planning consultant for GB (Bradford 2) Inc. (the “client”), the owners of 3174 5th Line in the Town of Bradford West Gwillimbury (“Town”). The lands are approximately 34.21 hectares (84.53 acres) in size and are bounded by 5th Line in the south, 10th sideroad in the east, a mid-concession lot line between Lots 9 and 10, Concession 5 in the west and a mid-concession lot line between Concessions 5 and 6 in the north (“Subject Lands”). A context map identifying the location of the Subject Lands is included herein as Attachment No. 1.

The Subject Lands are currently designated “Agricultural” on Schedule ‘A’ to the Town Official Plan, 2002 (“Town OP”) and “Agricultural” on Schedule 5.1 to the County of Simcoe Official Plan, 2016 (“County OP”). The Subject Lands are also proposed to be designated ‘Agricultural’ on Schedule ‘B’ to the Town’s New Official Plan Adopted by the Town on March 2, 2021 (“New Town OP”).

On April 29, 2021, the County of Simcoe (“County”) issued a Notice of Statutory Special Meeting in relation to the County Municipal Comprehensive Review (“MCR”). The purpose of the Special Meeting is to discuss the MCR process and to assist in determining the updates that may be required to the County OP under Section 26 of the Planning Act to bring it into conformity with A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020 (“Growth Plan”).

The Growth Plan provides population and employment growth forecasts to the County to 2051. The effect of these new forecasts is that the County is directed to plan for a population of 555,000 and 198,000 jobs by 2051; growth of 139,000 people and 66,000 jobs from the 2031 forecast used as the basis for the County OP and the New Town OP.

In accordance with the policies of the County OP, expansions to Settlement Area Boundaries can only be undertaken through a MCR (save and except for 40-hectare expansions as permitted by the Growth Plan). As part of the MCR, the County will be conducting a review of the population and employment forecasts to 2051, including the distribution of such to each of the County's local municipalities, including the Town.

It is acknowledged that the Settlement Area of Bradford within the Town is identified in both the Growth Plan and the County OP as a Primary Settlement Area. Pursuant to the Growth Plan, Municipalities with primary settlement areas will, in their official plans and other supporting documents:

- a) identify primary settlement areas;
- b) identify and plan for strategic growth areas within primary settlement areas;
- c) plan to support the achievement of complete communities within primary settlement areas; and,
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Section 6.3.4 of the Growth Plan further states that the Town will direct a significant portion of population and employment growth forecasted to the applicable primary settlement areas.

In order for the Town to achieve the objectives of the Growth Plan as it relates to primary settlement areas noted herein, a significant amount of the County's overall growth to 2051 should be directed to the Town. As such, we are respectfully requesting that the County allocate a sufficient quantum of growth to the Town to permit the expansion of the Bradford Settlement Area Boundary to include our clients' lands as Community Area Land.

On behalf of our client, while conducting the ongoing MCR, we ask that the MCR Project Team consider the Subject Lands for future expansions to the Settlement Area of Bradford to support the ongoing and desirable growth of the County. We would appreciate the opportunity to participate in discussions related to the MCR and may wish to make further detailed submissions in relation to subsequent reports related to this process.

Further, we respectfully request notice of any future reports and/or public meetings and consultations regarding the MCR, and further that we receive notice of any decision of County Council.

Yours very truly,

KLM PLANNING PARTNERS INC.



Keith MacKinnon, MCIP, RPP
Partner



Tim Schilling, MCIP, RPP
Senior Planner

Copy: David Parks, Director of Planning, Economic Development, Transit and Airport Services, County
Dan Amadio, Manager of Planning (South/East), County
Alan Wiebe, Manager of Community Planning, Town of Bradford West Gwillimbury
Melrose Properties Inc.

CONTEXT MAP



Subject Lands

Part of Lot 10, Concession 5
Town of Bradford, West Gwillimbury
County of Simcoe



Bradford Settlement Area Boundary

NTS





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SENT VIA EMAIL

File: P-2687

November 11, 2021

The County of Simcoe
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, Ontario
L9N 1X6

**Attention: Mr. Dan Amadio, Manager of Planning
Mr. Greg Marek, Manager of Planning**

**RE: County of Simcoe Municipal Comprehensive Review, Draft Land Needs
Assessment
GB (Bradford) Inc.
2944 5th Line
Town of Bradford West Gwillimbury**

Dear Mr. Amadio and Mr. Marek,

KLM Planning Partners Inc. is the land use planning consultant for GB (Bradford) Inc. (the “client”), the owners of 2944 5th Line in the Town of Bradford West Gwillimbury (“Town”). The lands are approximately 40 hectares (100 acres) in size and are bounded by 5th Line in the south, Bradford Highlands Golf Club in the east, a mid-concession lot line between Lots 11 and 12, Concession 5 in the west and a mid-concession lot line between Concessions 5 and 6 in the north (“Subject Lands”).

On May 28, 2021, we provided a letter to the County Clerk for the County’s Municipal Comprehensive Review (“MCR”) Special Meeting, requesting the consideration of our client’s lands for a future expansion to the Settlement Area of Bradford to support the on-going desirable growth in the County.

We have now reviewed the County’s Draft Land Needs Assessment undertaken pursuant to the Provincial methodology, and note that additional Community Area Land and additional Employment Area land is required within the Town of Bradford West Gwillimbury in support of a proposed 2051 population and employment forecast of 85,610 persons and 30,470 jobs, respectively. On this basis, the table summarizing land needs for Bradford West Gwillimbury

identifies the need for an additional 245 hectares of Community Area land and 115.3 hectares of Employment Area Land to accommodate the 2051 forecasts.

On behalf of our client, urbanMetrics have also completed a review of the County's Draft Land Needs Assessment and have provided detailed technical review comments in the attached.

We appreciate the opportunity to comment and we look forward to continuing to work with the County through the MCR process.

Yours very truly,

KLM PLANNING PARTNERS INC.



Keith MacKinnon, MCIP, RPP
Partner



Tim Schilling, MCIP, RPP
Senior Planner

Copy: David Parks, Director of Planning, Economic Development, Transit and Airport Services, County
Alan Wiebe, Manager of Community Planning, Town of Bradford West Gwillimbury
GB (Bradford) Inc.



2944 LINE 5

Boundary Expansion Study

Bradford West Gwillimbury, Ontario

Prepared for **GB (Bradford) Inc.**

November 2, 2021



This document is available in alternative formats upon request by contacting:

info@urbanMetrics.ca
416-351-8585 (1-800-505-8755)



November 2, 2021

Attention: Mohamad Al Ashkar
GB (Bradford) Inc.
145 Reynolds Street, Suite 400
Oakville, Ontario
L6J 0A7

Dear Mr. Al Ashkar:

RE: 2944 Line 5 – Boundary Expansion Study (Bradford West Gwillimbury, Ontario)

urbanMetrics is pleased to provide this study to examine the justification for a settlement boundary expansion incorporating your lands at 2944 Line 5 in Bradford-West Gwillimbury. The purpose of this study is to review the County's municipal comprehensive review work and to provide our opinion as to whether the proposed settlement boundary expansion to incorporate the GB (Bradford) lands was justified based on Provincial and municipal planning policies.

Based on our research and analysis, we would conclude that a settlement boundary expansion will be required to accommodate the growth projected in the County's Land Needs Assessment and that the subject lands would represent an ideal location for a boundary expansion given its location in the vicinity of the existing settlement boundary and proximity to municipal services.

It was a pleasure to conduct this analysis on behalf of your firm.

Yours truly,

A handwritten signature in black ink that reads "Rowan Faludi".

Rowan Faludi, MCIP, RPP, CMC, PLE
Partner
rfaludi@urbanMetrics.ca

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Executive Summary

Background

- GB (Bradford) Inc. owns approximately 40 hectares (100 acres) in size and are bounded by 5th Line in the south, Bradford Highlands Golf Club in the east, a mid-concession lot line between Lots 11 and 12, Concession 5 in the west and a mid-concession lot line between Concessions 5 and 6 in the north (“Subject Lands”).
- The Subject Lands are currently designated “Agricultural” on Schedule ‘A’ to the currently in force Town Official Plan, 2002 (“Town OP”) and “Agricultural” on Schedule 5.1 to the County of Simcoe Official Plan, 2016 (“County OP”). The Subject Lands are also proposed to be designated ‘Agricultural’ on Schedule ‘B’ to the Town’s New Official Plan Adopted by the Town on March 2, 2021 (“New Town OP”).
- The Town of BWG has recently adopted a new Official Plan as of March 2021. This plan, however, still requires County approval. As per this plan, the subject lands are still outside of the Bradford Settlement Area boundary, but it is acknowledged that settlement boundary expansions can only be approved through a County led Municipal Comprehensive Review (MCR), which is currently underway.
- As part of its, Official Plan Review process, the County has engaged Hemson Associates to conduct a Land Needs Assessment, the results of which at the municipal level, were made public on October 1, 2021. The purpose of this study is to review the County’s MCR work and to provide our opinion as to whether the proposed settlement boundary expansion to incorporate the GB (Bradford) lands was justified based on Provincial and municipal planning policies. In particular,
 1. Whether the boundary expansion is required to accommodate growth in BWG to 2051;
 2. Whether there are no other opportunities to accommodate required growth in BWG through intensification, redevelopment or within the designated greenfield area;
 3. Whether the boundary expansion would adversely impact the County’s intensification and density targets;
 4. Whether the location is appropriate in terms of taking advantage of existing municipal infrastructure and represents the logical expansion of the development area of the Town.
 5. That the boundary expansion will assist the Town achieve its housing goals.

Demographic and Market Profile

- Population growth in Bradford West Gwillimbury has outpaced most other municipalities in Simcoe County over the last 20 years, due in part to its location in proximity to employment opportunities in York Region, Peel Region, and the City of Toronto, as well as being the only Simcoe County municipality with a GO Train station within its Town boundaries.
- The pace of migration to Simcoe County from other municipalities in the Greater Golden Horseshoe has accelerated in recent years. The stronger migration to Simcoe County is due, in part, to the limited supply of ground-related housing (single-detached, semi-detached and row units) in the core of the Greater Golden Horseshoe.
- In comparison to Simcoe County, the Town of Bradford West Gwillimbury has a larger share of the population in the under 15 and 35 to 44 age cohorts. This suggests that Bradford West Gwillimbury has been the beneficiary of recent in-migration among young families. These age groups also have strong household formation rates and a general preference for larger, less dense dwelling types.
- The Town of Bradford West Gwillimbury historically accommodates approximately 10% of Simcoe County’s employment base. Schedule 3 of the Growth Plan, 2020 suggests that employment growth in the Town is likely to keep pace or exceed the rate of population growth and the future balance between employment and population is likely to settle into a higher activity rate than has been historically experienced in the Town.
- A significant proportion of the employed population of the Town commutes southward to municipalities such as York Region and the City of Toronto and are choosing to live in Bradford West Gwillimbury for reasons other than immediate access to employment. In addition, Simcoe County historically experiences significant annual net in-migration from other areas in the Greater Golden Horseshoe. It is our opinion that the availability of lower density unit types at relatively more affordable prices is a significant factor driving these trends.

Simcoe County Land Needs Assessment

- As per the Simcoe County Land Needs Assessment, Bradford West Gwillimbury is expected to accommodate 85,610 persons and an employment base of 30,470 employees by 2051. This represents a growth of 41,190 persons over the 30-year period between 2021 and 2051, approximately a 93% increase. As per the Growth Plan, these targets should be considered minimums. As per the Growth Plan, the County population and employment targets should be considered minimums and can be increased through a municipal comprehensive review, such as the one currently being conducted by Simcoe County.

- The previous update to the Simcoe County Land Budget completed in March 2021 by Hemson Consulting Ltd. identified that the Bradford West Gwillimbury Built-up Area and Designated Greenfield area did not contain sufficient lands to accommodate residential unit growth to 2031.
- The Simcoe County Land Needs Assessment prepared in October 2021 by Hemson Consulting Ltd. concluded that Bradford West Gwillimbury will require 245 hectares of new greenfield lands and faces a shortfall of 6,457 units within the Built-up Area to accommodate projected unit growth to 2051.
- The Simcoe County LNA utilizes a 45% intensification rate for Bradford West Gwillimbury. This is an increase over the existing 40% rate utilized in the Simcoe County Official Plan. As a result, the Town will be required to redevelop approximately 77 hectares of the existing Built-up Area to accommodate the 6,457-unit shortfall. As per the Growth Plan policies for Simcoe County, the County is only required to maintain or “improve” the intensification rate in its existing Official Plan. The increase in the rate is not based on a Provincial policy requirement.
- The County’s Land Needs Assessment implements a policy-based housing mix that diverges significantly from what could be considered market-based demand for housing unit types. Hemson Consulting Ltd. identified a market housing mix of 73% single and semi-detached units, 13% row units, and 15% apartment units, yet utilizes a housing mix that is only 47% single and semi-detached, maintains 13% row units, and increases apartment units from 15% to 41% of total units.
- In our opinion, the Land Needs Assessment makes the assumption that apartment units are a direct substitute for single and semi-detached units. This is not the case, particularly for families, which dominate the Bradford-West Gwillimbury housing market. For this reason, the forced shift from single and semi-detached units is contrary to market demand and is unsustainable in this community.
- The supply tables prepared as part of the County’s LNA indicate a potential BUA unit supply of 968 units, with a DGA supply of 688 units. This results in a total supply of 1,656 units, 906 units less than identified some 6 months earlier. These units are not accounted for in active development applications or completions tracked by CMHC. It is unclear what factors influencing this unit potential changed between the land budget exercise and the County LNA, and it is also unclear how this significant increase in the unit shortage within the Built-Up Area supports an increase in the intensification rate.
- The municipalities of Adjala-Tosorontio, Essa, New Tecumseth, Innisfil and Bradford West Gwillimbury, together comprise the Southern Regional Market Area Municipalities. The Land Needs Assessment identifies a combined DGA land need of 701.0 hectares based on the individual land needs summaries for the Southern Regional Market Area. However, the Public

Open Houses on the Draft Land Needs Assessment identifies Community Area land needs deficit of 350 hectares for the Southern Regional Market Area. There is no explanation for the difference between the 701-hectare expansion identified in the land needs summaries and the 350-hectare expansion identified in the presentation on October 5th, 2021.

- The subject site is approximately 40 hectares and represents some 16% of the estimated greenfield land need. Its location within 1 kilometre of the western and southern boundaries of the currently settlement area boundary means it presents an opportunity to meet a large portion of the land need through a logical and minimal expansion of the settlement area.
- The subject site is in proximity of serviced low-density residential development and the associated infrastructure and public service facilities. In addition, the site has frontage on Line 5, a roadway which is partially designated *Arterial-Major* in the Town’s proposed Official Plan update.

Summary of Findings

- In order to accommodate growth to 2051 the Town of Bradford West Gwillimbury will require an expansion of the Settlement Area boundary.
- Despite an unsubstantiated increase in the intensification rate and an overly significant deviation from market demand in the policy-based housing mix to reduce land needs, the County Land Needs Assessment still identified a need for a minimum of 245 hectares of additional Designated Greenfield Area lands to accommodate residential growth to 2051.
- There is a lack of available land to support the development of the shortfall of 6,457 units within the existing Built-up Area, and development of this nature would require an exponential increase in the scale of construction and intensification within the mature neighbourhoods of the Town.
- We estimate that if the policy-based housing mix were to be developed, some 77 hectares of already built-up area would need to be intensification, with 56 hectares developed to support high density apartment units. In our opinion, this is unrealistic and, if the existing 40% intensification rate were used, the need for urban expansion to accommodate new growth would be even greater than 245 hectares.
- The subject site at 2944 Line 5 is located in proximity to existing infrastructure and public service facilities, and provides the opportunity for an expansion of the settlement area boundary that maintains a logical boundary, efficiently utilizes existing infrastructure assets, avoids development on Specialty Crop Areas, and accommodates a range of housing types.

Conclusion with Respect to the Proposed Boundary Expansion

Based on a review of Provincial and municipal planning policies related to settlement boundary expansions, this study has addressed the following questions.

1. Is the settlement boundary expansion required to accommodate growth in BWG to 2051?

The Simcoe County Land Needs Assessment, even with an aggressive intensification target, concludes that some 245 hectares of additional residential lands are required outside of the built-boundary.

2. Are there other opportunities to accommodate required growth in BWG through intensification, redevelopment or within the designated greenfield area?

The Land Needs Assessment indicates that there is not sufficient opportunities within the built boundary to accommodate the proposed intensification target of 45%. As noted above, the Land Needs Assessment has concluded that there is insufficient land within the DGA to accommodate projected growth.

3. Would the settlement boundary expansion adversely impact the County's intensification and density targets?

No. Additional DGA lands will be required even with the proposed 45% target for Bradford-West Gwillimbury. The County has established a target of 55 persons and jobs per hectare for the DGA. The developer will work with the Town to ensure that residential development on their lands achieves the appropriate density to ensure that the Town-wide DGA density target can be achieved.

4. Is the location appropriate in terms of taking advantage of existing municipal infrastructure and represents the logical expansion of the development area of the Town?

The location of the subject lands represents a logical location for a boundary expansion. The subject site at 2944 Line 5 is located in proximity to existing infrastructure and public service facilities, and provides the opportunity for an expansion of the settlement area boundary that maintains a logical boundary, efficiently utilizes existing infrastructure assets, avoids development on Specialty Crop Areas, and accommodates a range of housing types.

5. Will the boundary expansion assist the Town achieve its housing goals?

The current Bradford-West Gwillimbury Official Plan does not have a Section dedicated to Housing Policy. Under the Plan Objectives are the following policies related to Housing.

- 3.4.3.1 *To provide a variety of housing forms and opportunities throughout the Town which attempts to respond to the need for different types of accommodation for the expected changes in family composition.*

3.4.3.2 Improved neighbourhood design and a broader mix of housing types and price range, built form and densities will be encouraged by the development of Community Plans, to be prepared by subdividers and reviewed in public prior to subdivision approval.

As indicated by the County’s Land Needs Assessment, without a settlement boundary expansion, the Town will not be able to accommodate projected growth. This will reduce housing opportunities within the municipality and lead to housing price escalation if demand cannot be satisfied by the supply. The boundary expansion will contribute to greater housing affordability. The developer will work with the Town to prepare a housing mix for the residential development on the subject lands that reflects housing needs and policies established in the Town and County Official Plans.

2.0 Introduction

2.1 Background

urbanMetrics inc. (“urbanMetrics”) has been retained by GB (Bradford) Inc. to analyze the potential impacts of the County of Simcoe’s (“The County”) Land Needs Assessment on the Town of Bradford West Gwillimbury (“the Town”, “BWG”), the need for an expansion of the Town’s settlement area to support population growth to the 2051 planning horizon, and the subject site’s suitability to be included in an expanded settlement area.

2.2 Purpose

The County of Simcoe has recently released a draft Land Needs Assessment as part of their ongoing Municipal Comprehensive Review (MCR) that allocates population and employment growth to BWG and other Simcoe County municipalities to 2051, based on population and employment forecasts contained in Schedule 3 of *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (the “Growth Plan”).

The purpose of this study is:

- To review the County’s Land Needs Assessment with regards to Bradford-West Gwillimbury to assess whether it appropriately estimates the land required to accommodate population and employment growth to 2051 as per the policies of the Growth Plan and the *Land Needs Assessment Methodology for the Greater Golden Horseshoe (2020)*, hereafter referred to as the LNA Methodology.
- To assess whether additional Greenfield Lands would be required to support future growth in the municipality.
- To assess the subject lands to determine their suitability to accommodate a portion of the Town’s future Greenfield Land needs as per the requirements of Provincial and municipal planning policies.

2.3 Approach

The following section describes the major work tasks undertaken by urbanMetrics in carrying out this evaluation of the Community Area Land Needs Analysis. The scope of work has been divided into the following categories:

- **Demographic and Market Profile:** To contribute towards an understanding of market demand for housing, we have reviewed current housing trends in BWG, Simcoe County, and the Greater Toronto Hamilton Area. This includes a review of the demographic characteristics of

the population in the region, propensities to live in various forms of housing, housing construction, employment trends, and commuting trends.

- **Market Demand for Housing:** Based on these demographic and market trends, as well as the Simcoe County population and employment forecasts contained in Schedule 3 of the Growth Plan, and the allocation of a portion of this population and employment to BWG, we have evaluated the LNA’s conclusions relating to the market demand for housing and the sufficiency of the policy-based allocations in the LNA at accommodating this market demand.
- **Housing Supply:** We have evaluated the available supply of unbuilt units within the Town of BWG. This land supply considers all known applications for residential units estimated to be available as of October 1, 2021, as well as vacant lands not under application but designated for residential uses.
- **Community Area Land Needs:** Taking into consideration the intensification targets and the Designated Greenfield Area (DGA) density targets we have compared market demand for housing in BWG to the identified supply of unbuilt units to determine the future need for Community Area lands to the 2051 planning horizon. In addition to this evaluation, we have analyzed the implications of the intensification rates and density targets utilized in the County’s LNA on the future development of residential units in Bradford.

2.4 Assumptions

There are several underlying and basic assumptions upon which the validity of the analysis and findings presented in this report depend. Based on our considerable experience as land economists, we recognize and appreciate the problems associated with making broad and generalized assumptions about future market conditions. Undoubtedly, deviations from historic and current trends will take place in the future. However, core assumptions are required to determine the extent of such deviations. The assumptions used in the preparation of this report are summarized below.

- While this study was prepared during the COVID-19 global pandemic, we have assumed that the economic impacts of this event, although severe, will be followed by eventual full-economic recovery. Our projections assume the return of reasonable economic stability in the Province of Ontario and the Town of New Tecumseth. However, there are emerging signs that the pandemic could have lasting implications on the geospatial distribution of employment.
- The official statistical sources utilized in our analysis (based largely on Statistics Canada, the Census of Canada and Canada Mortgage and Housing Corporation (CMHC), which have been noted where utilized) are considered sufficiently accurate for the purposes of our analysis.

If for any reason major changes occur in the marketplace which would influence the basic assumptions stated above, the recommendations and/or conclusions in this report should be reviewed considering circumstances and revised, if necessary.

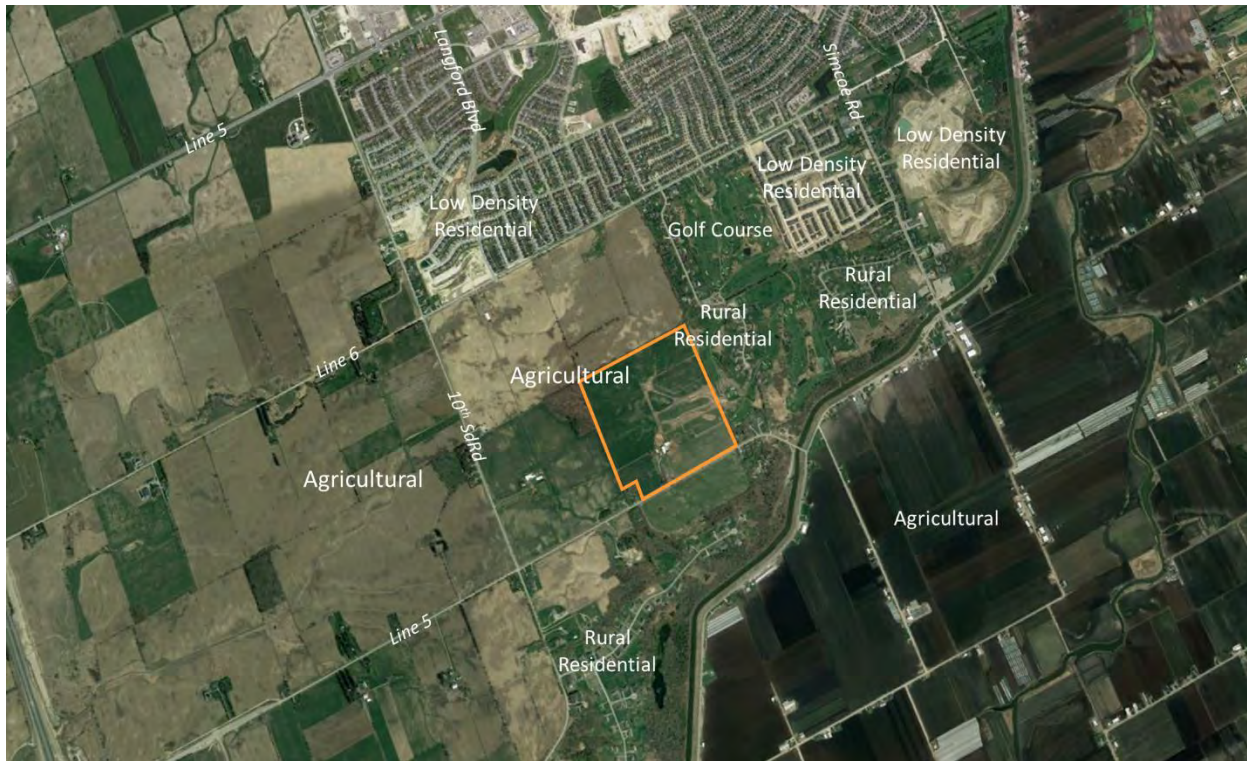
3.0 Site Context

3.1 Site Characteristics & Surrounding Land Uses

The site is approximately 34.21 hectares (84.53 acres) and currently supports agricultural uses. To the north there is one additional agricultural site between the subject site and low-density residential uses that constitute the start of the Bradford urban area. Immediately to the east are rural residential uses built as part of the residential development of Bradford Highlands Golf Club.

To the southwest there are agricultural uses between the subject site and further rural residential development. This existing rural residential is subject to the Greenbelt Natural Heritage System as [art of the County of Simcoe Official Plan Schedule 5.3.3 and serves as a further buffer between the BWG urban area and the Specialty Crop Areas of the Holland Marsh to the south and east.

Figure 3-1 - Surrounding Land Uses

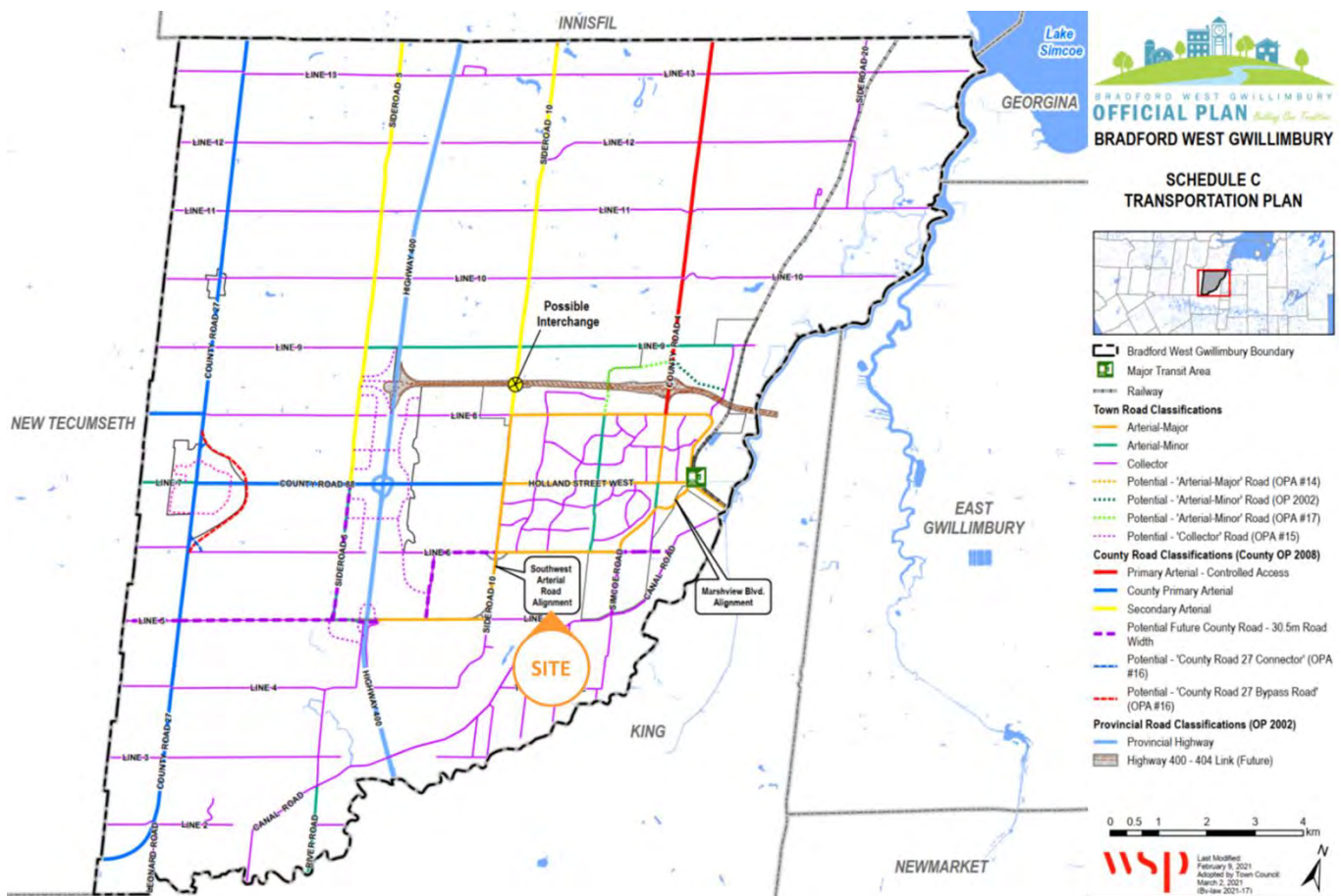


SOURCE: urbanMetrics inc., ESRI, for illustrative purposes only.

3.2 Site Accessibility

The subject site is well served by the existing and planned vehicular transportation network in Bradford West Gwillimbury. Line 5 provides the site with frontage on a portion of the roadway designated as *Collector* in the draft Official Plan, though Line 5 is designated as *Arterial-Major* a few hundred metres to the west of the subject site. Sideroad 10, the nearest roadway to the west, is also designated as *Arterial-Major*, and provides convenient direct access to the interchange with Highway 400 and the regional transportation network.

Figure 3-2: Transportation Network - 2021 Draft Official Plan Update

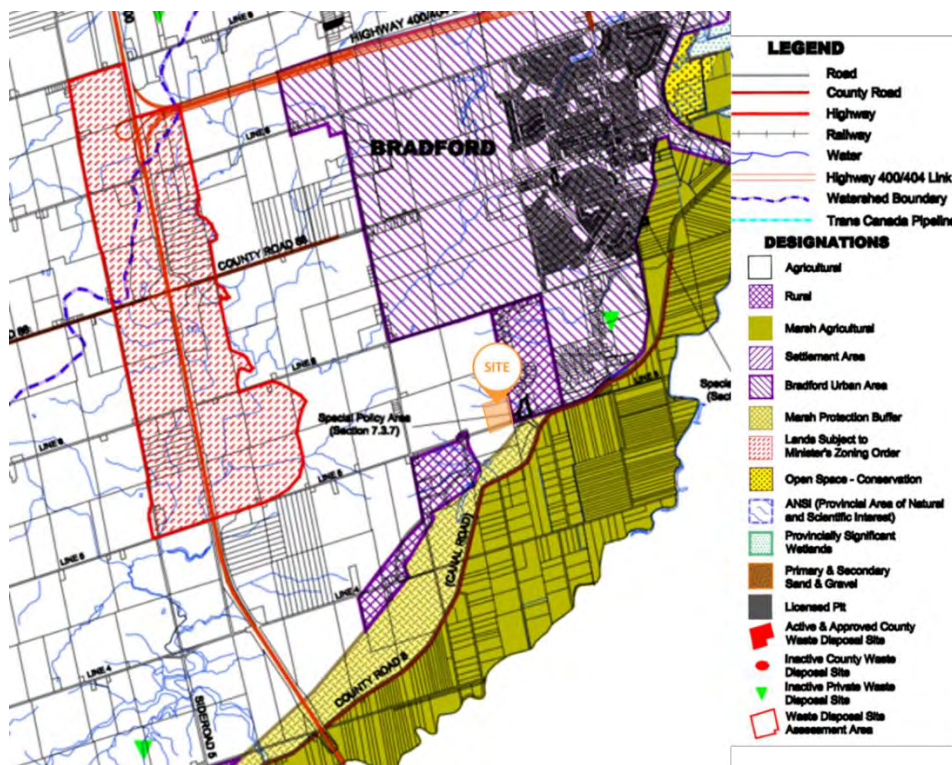


SOURCE: Town of BWG, urbanMetrics inc., For illustrative purposes.

3.3 Land Use Planning Policy Framework

The Town of Bradford West Gwillimbury is current progressing a new official plan that will update the current in-force Official Plan (“OP”), which became in-force in 2002. Since that time there have been several Official Plan Amendments to bring the OP into conformity with iterations of the Growth Plan and to have regard for an updated County of Simcoe Official Plan. Under the in-force OP the subject site is designated for *Agricultural* uses and sits immediately adjacent to the *Rural* designation of the residential and recreational uses that comprise Bradford Highlands Golf Course.

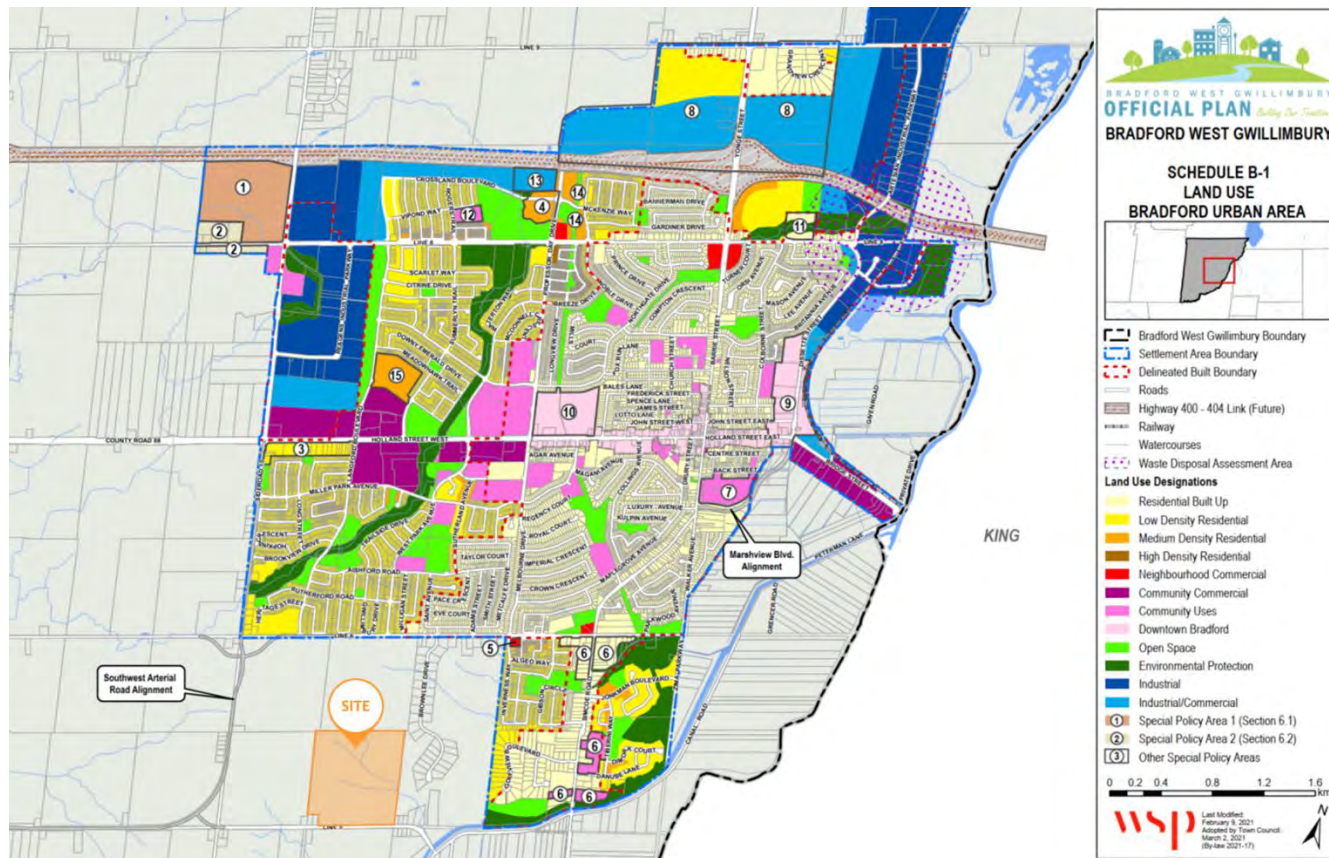
Figure 3-3: Land Use - BWG Official Plan 2002



SOURCE: Town of BWG, urbanMetrics inc., Site boundaries are approximate. For illustrative purposes only.

In both the in-force Official Plan and the 2021 proposed OP update the subject site is outside of the *Settlement Area Boundary*, although it is located in proximity of the southern and eastern borders of the area, as shown in Figure 3-3 and Figure 3-4. It sits approximately 700 metres south and 650 metres east of the settlement area and delineated built boundary. The lands immediately to the east are designated for rural residential uses bordering the golf course. The adjacent lands to the north, west, and south are designated for agricultural uses, with additional rural residential uses further to the southwest.

Figure 3-4: Land Use - 2021 Draft Official Plan Update



SOURCE: Town of BWG, urbanMetrics inc. Site boundaries are approximate. For illustrative purposes only.

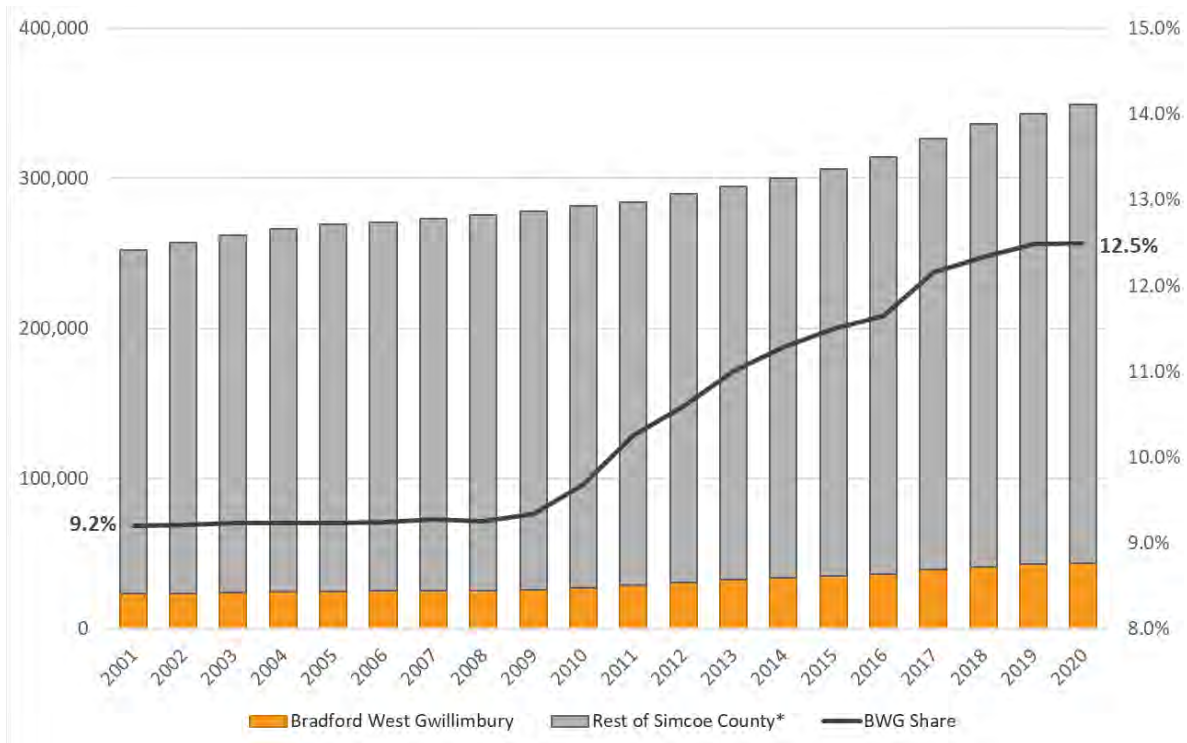
In summary, the lands are well positioned to provide for future residential uses that would be included as part of an expansion to the Bradford-West Gwillimbury urban boundary. They enjoy excellent accessibility and conjunction with adjacent lands either/and to the north and east they would represent a compact and logical expansion of the Community Area.

4.0 Demographic & Market Profile

4.1 Population Growth

The Town of Bradford West Gwillimbury has recently emerged as one of the fastest growing municipalities in Simcoe County and the outer ring of the Greater Golden Horseshoe. As shown in Figure 4-1, BWG has rapidly increased as a proportion of Simcoe County’s population between 2010 and 2020. For the purposes of this analysis and to align with Schedule 3 of the Growth Plan 2020, unless otherwise noted, references to Simcoe County do not include the City of Barrie, City of Orillia, Mnjikaning First Nation 32, Christian Island 30, and Christian Island 30A.

Figure 4-1: Total Population in Bradford West Gwillimbury and Simcoe County, 1991-2020



*To be consistent with population and employment forecasts in Schedule 3 of the Growth Plan, unless otherwise noted, all references to Simcoe County exclude the City of Barrie, City of Orillia, Mnjikaning First Nation 32, Christian Island 30, and Christian Island 30A

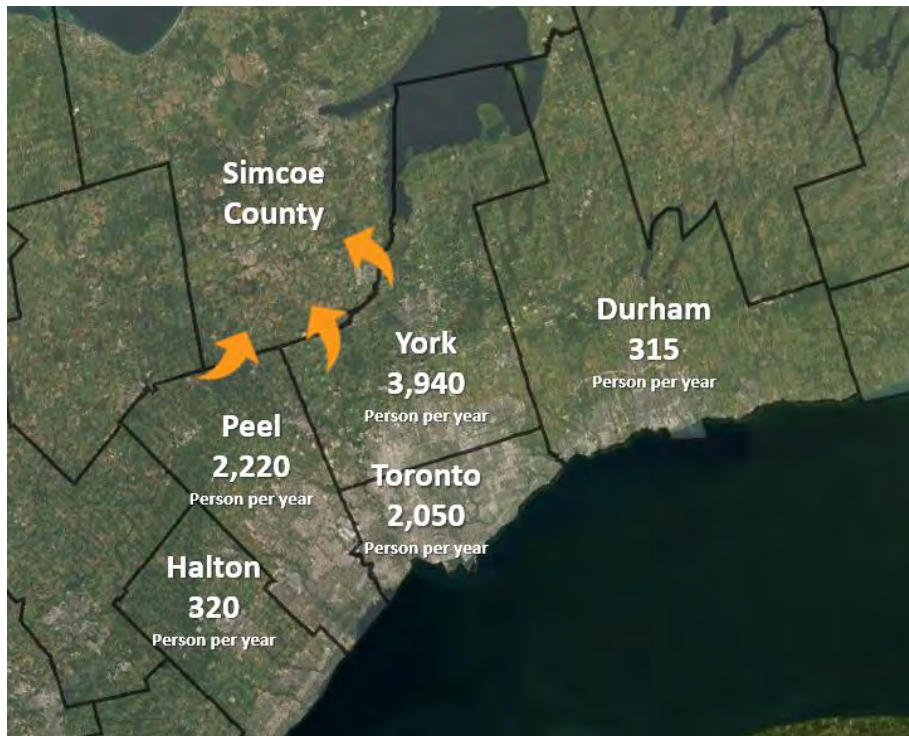
SOURCE: urbanMetrics inc., based on Statistics Canada Annual Demographic Estimates.

A significant component of population growth in Simcoe County and BWG is net migration from other neighbouring municipalities in the Greater Golden Horseshoe. This is consistent with observations by Hemson Consulting Ltd. (“Hemson”) in *Greater Golden Horseshoe: Growth Forecasts to 2051, June 16, 2020*, where they state:

The County of Simcoe, in the Outer Ring, is located due north of the GTA, to which it is connected by Highway 400. The County’s economy is diverse, and includes agricultural, industrial, and tourism-related employment. Urban areas in the south have experienced rapid growth in recent years due to in-migration from the GTA and the relative proximity to jobs in York Region and Toronto. Major employers in the south include a large automotive plant (Honda) and Canadian Forces Base Borden.

The observation by Hemson is consistent with recent net migration trends to Simcoe County. Figure 4-2 shows net migration to Simcoe County (which includes Barrie and Orillia) for the period from 2012 to 2019. As shown, on average, over this period Simcoe County had positive net migration of approximately 8,860 persons per year to the County from GTA municipalities. This pace of net migration to Simcoe County has accelerated in recent years, increasing from approximately 5,700 persons in 2012 to nearly 9,700 persons in 2019. The stronger migration to Simcoe County is due, in part, to the limited supply of ground-related housing (single-detached, semi-detached and row units) in GTA municipalities and increasing house prices, which are impacting affordability.

Figure 4-2: Average Annual Net Migration with Simcoe County

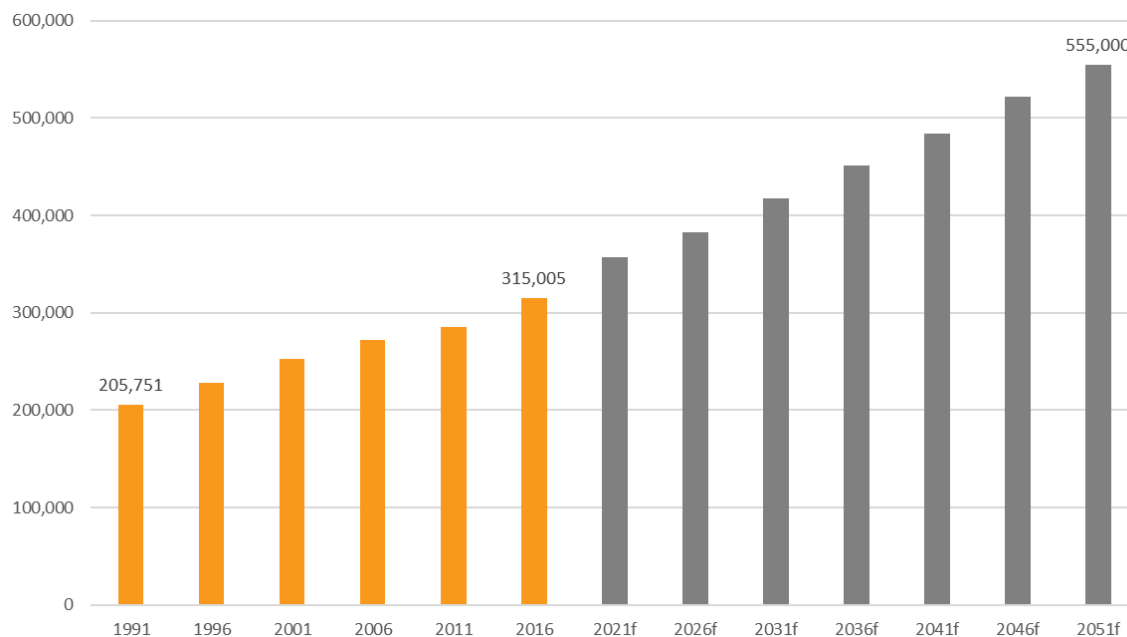


NOTE: Simcoe County includes Barrie and Orillia.

SOURCE: urbanMetrics inc. based on Statistics Canada Tax Filer Migration Data, 2012 to 2019.

Based on population growth forecasts included in Schedule 3 of the Growth Plan and shown in Figure 4-3, the Province anticipates that population growth in Simcoe County will accelerate between 2016 and 2051. In the 25 years between 1991 and 2016 the population in Simcoe County grew at an average annual pace of approximately 4,370 persons per year. By comparison, to meet the 2051 population forecast included in Schedule 3 of the Growth Plan, between 2016 and 2051, the population in Simcoe County is expected to grow at an average annual pace of approximately 6,860 persons per year. Therefore, in comparison to past trends in land absorption, it is anticipated that the pace of land absorption in Simcoe County will increase. To accommodate this growth, it will be important that the County has an adequate supply of land available to avoid housing shortages, which will impact affordability.

Figure 4-3: Simcoe County Population, Historical & Forecast



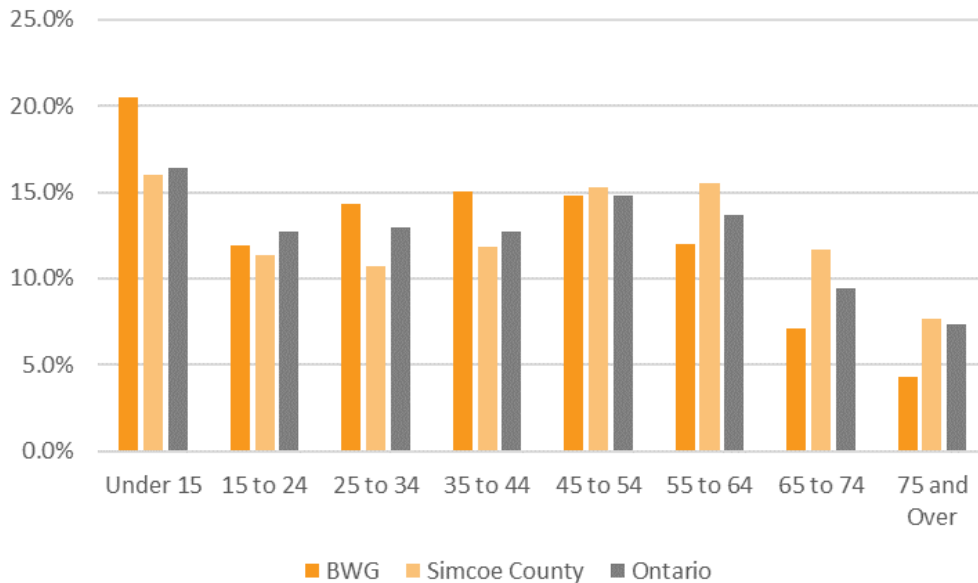
SOURCE: urbanMetrics inc. based on Hemson Consulting Ltd., *Greater Golden Horseshoe: Growth Forecasts to 2051*, June 16, 2020.

4.2 Demographic and Household Profile

Figure 4-4 summarizes the share of the population by age group in the Town of Bradford West Gwillimbury, in comparison to Simcoe County and the Province. As shown, in comparison to Simcoe County, the Town of BWG has a larger share of the population in the under 55 age cohorts and a smaller share of the population in the age 55 and over cohort. This suggests that BWG has been the prime beneficiary of recent in-migration in the younger age cohorts. This is not surprising, as it is one

of the closest Simcoe County municipalities to the employment opportunities in York Region and the City of Toronto.

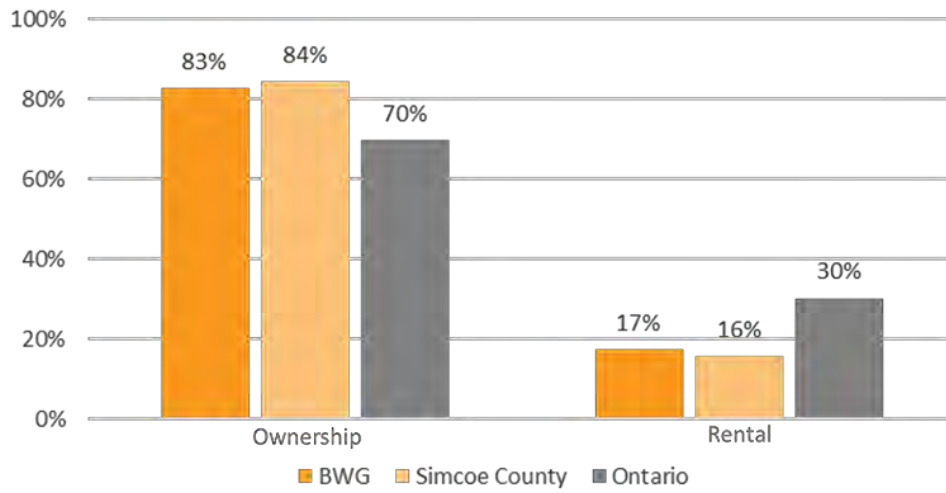
Figure 4-4: Population by Age Group, 2016



SOURCE: urbanMetrics inc. based on 2016 Census of Canada.

Figure 4-5 illustrates that at 83%, the share of owner households in Bradford West Gwillimbury is in line with Simcoe County (84%) and greater than the Province (70%). This further supports the assumption that one of the drivers of migration to Simcoe County and the Town is the opportunity to own housing at a more affordable level than can be found elsewhere in the Greater Golden Horseshoe, while still maintaining a reasonable commute to economic opportunities across the region.

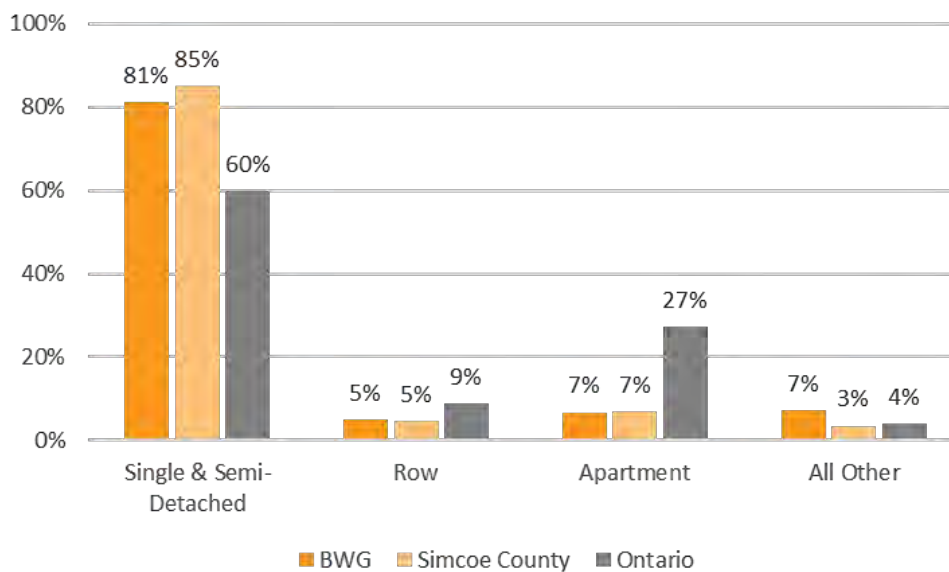
Figure 4-5: Households by Tenure



SOURCE: urbanMetrics inc. based on 2016 Census of Canada.

Relative to Simcoe County, at the time of the 2016 Census, BWG had a similar share of households residing in Row and Apartment units (Figure 4-6), a smaller proportion of single & semi-detached households, and a higher proportion of other unit types.

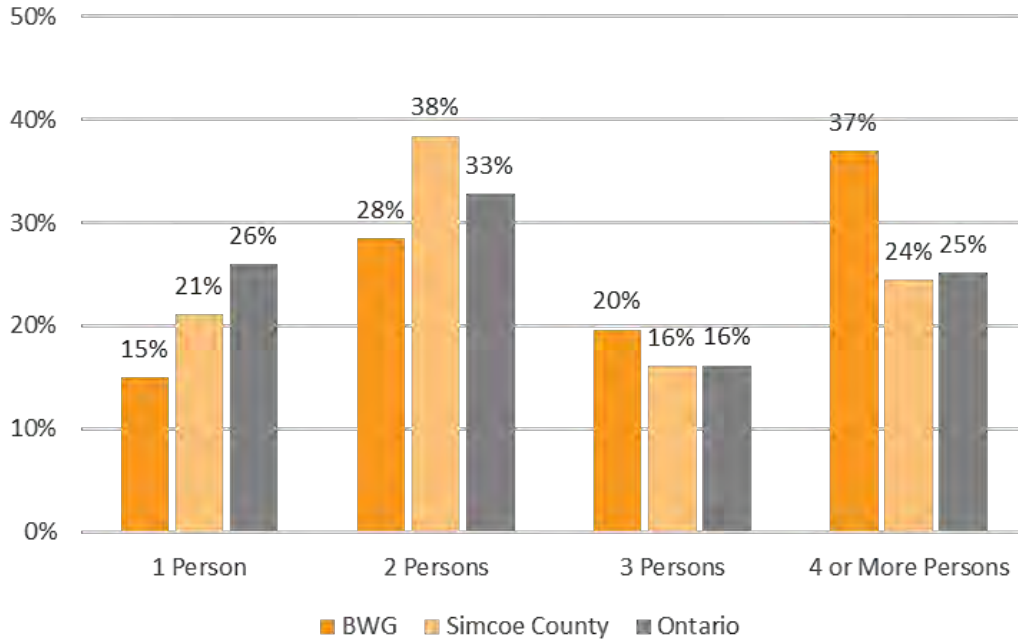
Figure 4-6: Households by Dwelling Type



SOURCE: urbanMetrics inc. based on 2016 Census of Canada.

Figure 4-7 shows that relative to Simcoe County, BWG had a significantly larger share of households with 4 or more persons. This is consistent with the earlier observation that Bradford West Gwillimbury had a larger share of its population in the under 55 years of age cohort, as many of these households are likely families with children still living at home.

Figure 4-7: Households by Household Size



SOURCE: urbanMetrics inc. based on 2016 Census of Canada.

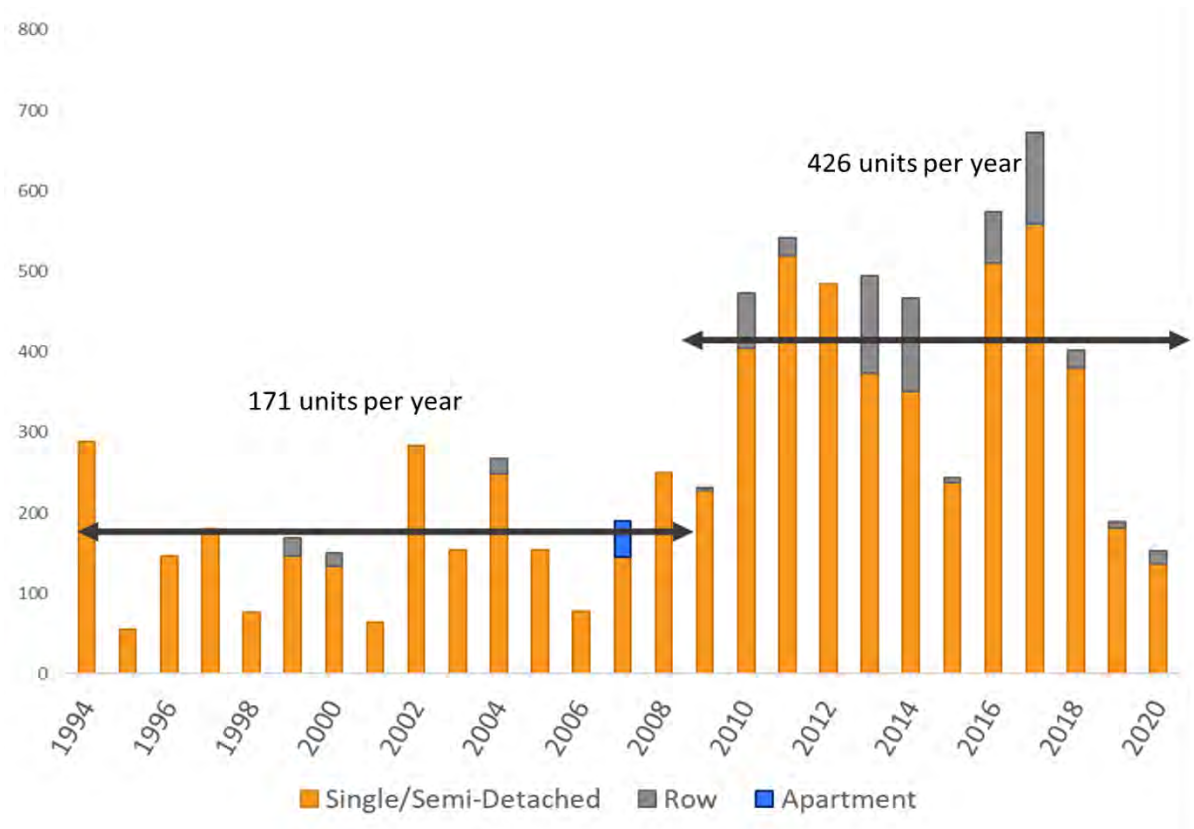
4.3 Housing Construction

Bradford West Gwillimbury has seen housing construction accelerate in recent years. As shown in Figure 4-8, housing completions averaged 171 units per year between 1994 and 2009. However, since 2010 housing construction has averaged 426 units per year, with a peak of 672 units in 2017. While housing completions slowed slightly in 2019 and 2020, with the latter potentially attributable to the influence of the pandemic on the broader economy and the permit and approvals process, annual averages remain above the 1994 to 2009 level.

Figure 4-8 also shows that housing construction by unit type has become slightly more diversified in recent years, with a shift towards row units. It is also notable that there has been very little apartment construction in Bradford-West Gwillimbury. Over the past 10-years, CMHC has identified

only 45 apartment unit completions. This does not include institutional unit types such as those in integrated care seniors’ communities, of which a handful have been developed in the Town in recent years.

Figure 4-8: CMHC Housing Completions, Bradford West Gwillimbury



SOURCE: urbanMetrics inc., based on CMHC

4.4 New Home Prices

Increases in housing prices in Bradford West Gwillimbury have also accelerated in recent years, but not to the extent of the Toronto market, as approximated by the Toronto Census Metropolitan Area (CMA). As shown in Figure 4-9, average absorbed new single and semi-detached house prices in BWG grew at an average annual rate of 4.7% between 1994 and 2009, with this rate increasing to 5.6% annually between 2010 and 2020. Average annual prices of absorbed single and semi-detached units in the Toronto CMA increased by 4.7% over the period between 1994 and 2009, before accelerating to an average annual increase of 8.7% between 2010 and 2020.

Figure 4-9: CMHC Absorbed House Price, Single and Semi-Detached, BWG



SOURCE: urbanMetrics inc., based on CMHC

The Ministry of Municipal Affairs and Housing published affordable house price thresholds that meet the Provincial Policy Statement (the “PPS”) definition for affordable for each region of Ontario. For Simcoe County the identified affordable house price in 2019 was \$351,000 based on a household with income in the 60th percentile. In 2019 the 60th percentile price of a new home in BWG was \$635,000, nearly two times the affordability threshold. This is a significant difference, particularly when considering that single and semi-detached units accounted for more than 90% of unit completions in 2018 and 2019.

One way to influence the provision of more attainable housing is to ensure there is a sufficient and appropriate housing supply available to accommodate market demand. The impact of housing supply shortages on housing prices is identified in the LNA Methodology, where it states:

Given the complexity of completing the municipal comprehensive review, municipalities must designate all land required to the Plan horizon when using the Methodology through an official plan or official plan amendment. The objective is to provide sufficient land to accommodate all market segments so as to avoid shortages that would drive up land cost for both housing and employment uses...Schedule 3 of the Plan establishes the minimum population and employment growth forecasts that municipalities must use to assess land needs to the Plan

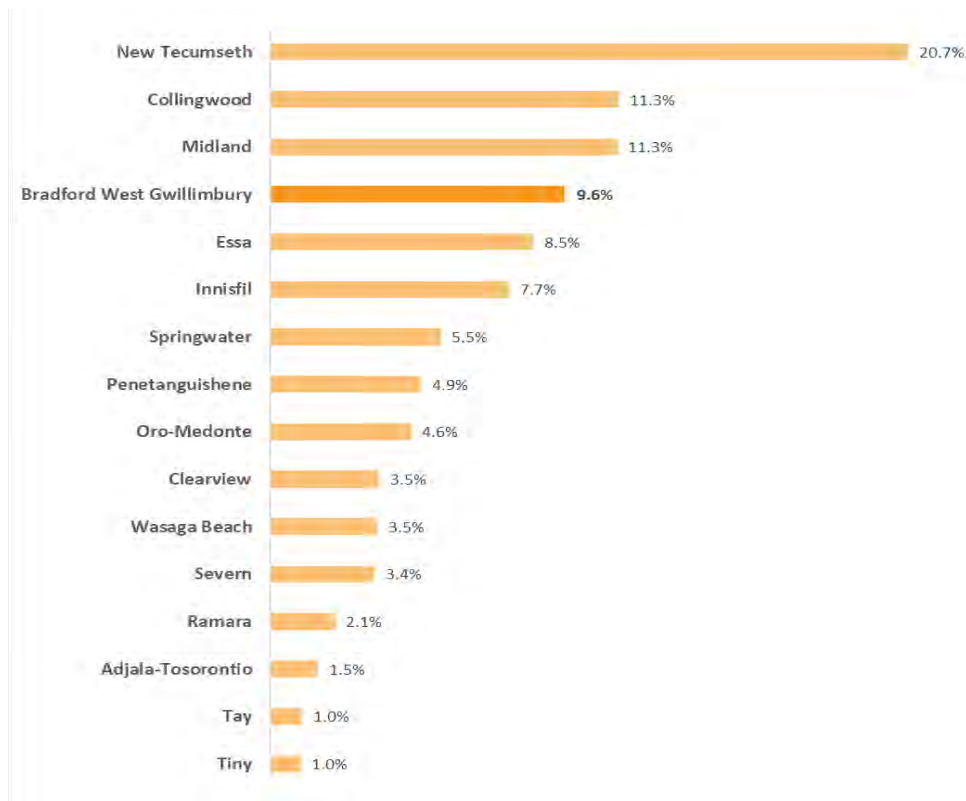
horizon. Lower forecasts are not permitted as this may lead to affordability issues and land shortages (Emphasis added).

These statements in the LNA Methodology illustrate the Province’s acknowledgement of the link between the supply of new housing that is available and increases in house prices. This highlights the importance of ensuring there is a sufficient supply of Community Area lands to avoid housing shortages and mitigate affordability issues.

4.5 Employment Profile & Commuting Trends

As shown in Figure 4-10, the Town of BWG was home to 9.6% of Simcoe County’s 2016 employment by place of work. It is anticipated that Bradford West Gwillimbury will continue to accommodate a significant amount of the County’s employment moving forward.

Figure 4-10: Share of Simcoe County Employment, Usual Place of Work, 2016



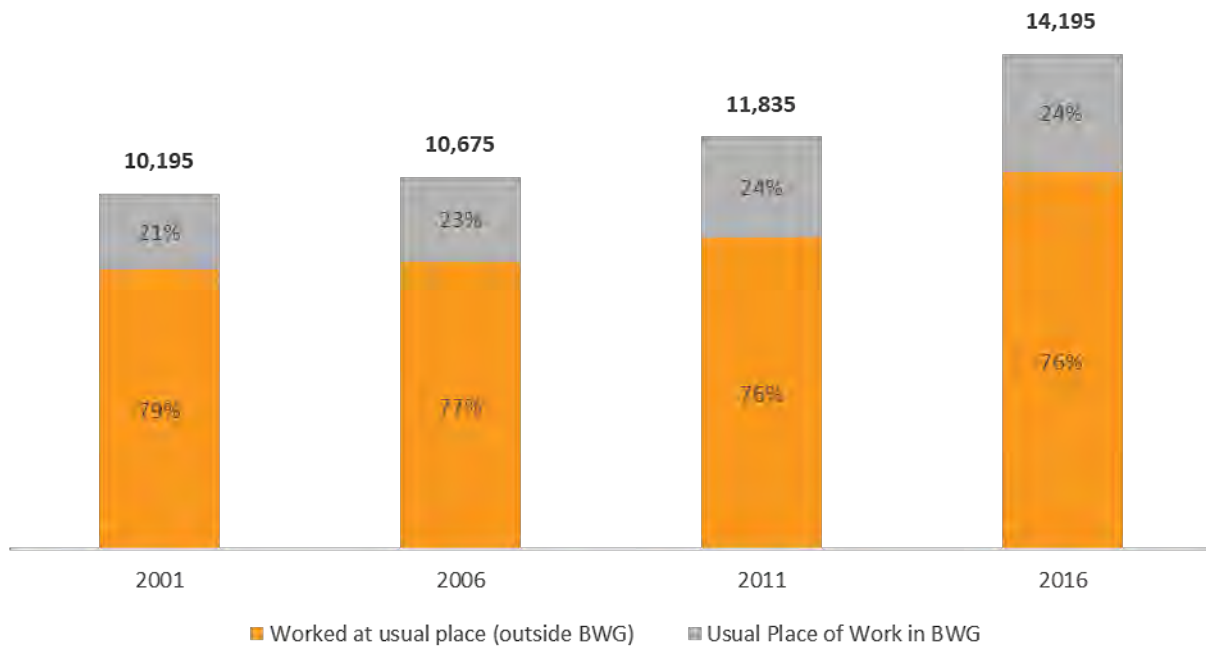
SOURCE: urbanMetrics inc. based on 2016 Census of Canada.

Employment forecasts prepared by Hemson in *Greater Golden Horseshoe: Growth Forecasts to 2051* anticipate that Employment Land Employment (ELE) growth is anticipated to account for nearly half of

all employment growth between 2016 and 2051 in Simcoe County. The building out of BWG’s Highway 400 Employment Area is likely to contribute to employment growth in the town and therefore influence demand for housing.

There is not necessarily a one-to-one connection between housing and employment, particularly within an economically connected region like the Greater Golden Horseshoe. As such, residents of many municipalities commute to another municipality for employment. In the case of Bradford West Gwillimbury, the majority of BWG residents work at a location outside the municipality, and the rate has increased in recent years, as shown in Figure 4-11 below.

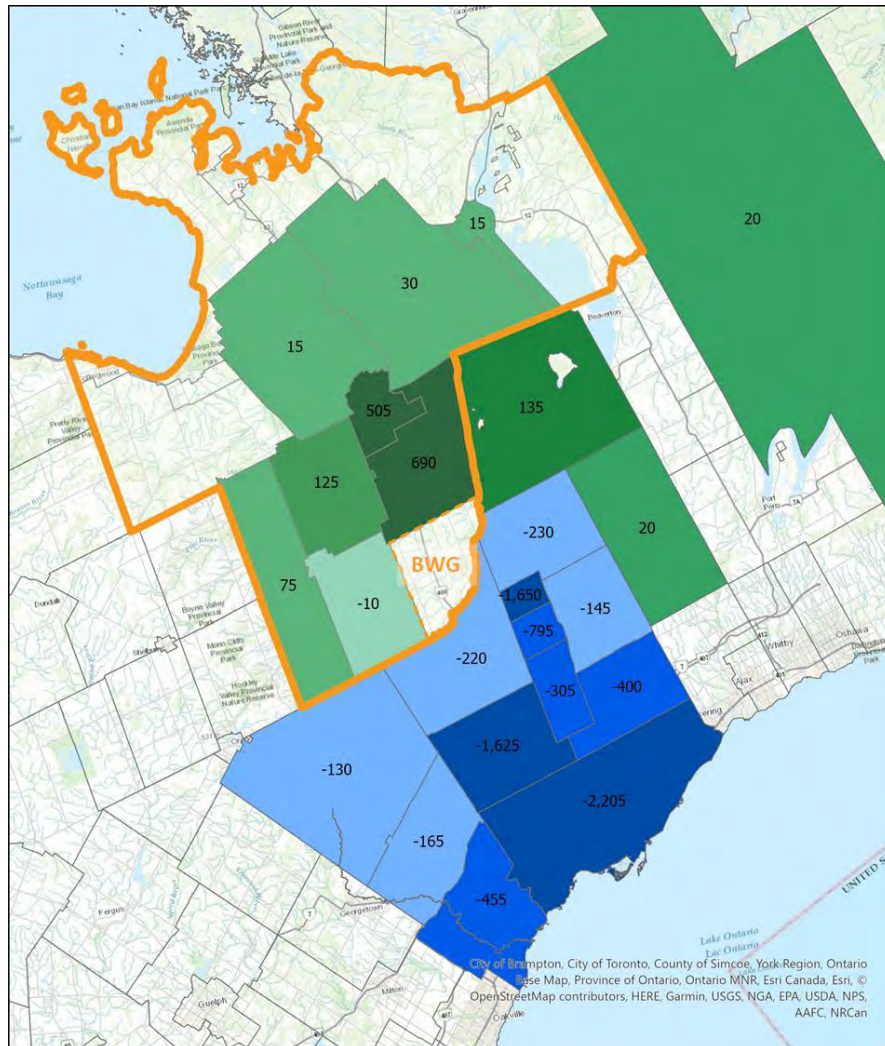
Figure 4-11: BWG Residents with a Usual Workplace Address by Location of Work



SOURCE: urbanMetrics inc., based on 2016 Census of Canada

As shown in Figure 4-12, commuting patterns through the Town of Bradford West Gwillimbury typically follow a north-south pattern. Of the 7,470 employed persons with a normal place of work in BWG 45% live within the Town itself, with 12% employees commuting south from Innisfil and 11% from Barrie. A significant proportion of employees in BWG also commute from elsewhere with larger proportions from Newmarket (6%), New Tecumseth (5%), and Toronto (4%).

Figure 4-12: Bradford West Gwillimbury 2016 Net Commuting Flows



SOURCE: urbanMetrics inc., from 2016 Statistics Canada Catalogue Number 98-400-X2016325

However, these commuting inflows are a smaller portion of the larger trend of southward commuting. In 2016 Statistics Canada identified 14,195 residents of the Town employed with a usual place of work. The same 3,380 residents/employees that comprise 45% of the Town’s usual place of work employment base as mentioned above represent 24% of total place of work employment by BWG residents. More than 45% of the Town’s employed residents commute south to the municipalities of York Region, with the largest concentrations in Newmarket, Vaughan, and Aurora. Approximately 17% of the Town’s employed residents commute to the City of Toronto. Some 4.2% of employed residents commute to elsewhere in Simcoe County, with an additional 2.2% commuting to the City of Barrie.

The commuting inflows of residents from municipalities in Simcoe County south to BWG, and the comparatively larger outflows of BWG residents south into York Region and the City of Toronto demonstrate the degree of economic linkages between the Town and its neighbouring municipalities of Simcoe County and with the broader Greater Golden Horseshoe. As such, the projected increases in employment across York Region and the City of Toronto are likely to significantly impact demand for residential units in the Town over the planning horizon.

5.0 County Land Needs Assessment

Summary

Schedule 3 of the Growth Plan, August 2020 provides population and employment targets to 2051. Prior versions of the Growth Plan incorporated a “Schedule 7”, which provided targets for the individual municipalities within Simcoe. However, as with other Upper Tier Municipalities in the GTHA, Simcoe is required to re-allocate its population and employment targets to the individual lower tier municipalities. The County has been targeted with a 2051 population of 555,000 people and employment base of 198,000 jobs. As per the Growth Plan policies, these are considered minimum targets and can be increased by the County through a municipal comprehensive review (MCR).

Through the County’s ongoing MCR, Simcoe County arrived at population allocations for its lower tier municipalities, including Bradford West Gwillimbury. These were released as the Simcoe County Land Need Assessment on October 1, 2021. The Bradford-West Gwillimbury forecast utilizes a 2021 baseline of 44,420 residents and 11,970 jobs. Population of the Town is projected to increase to 85,610 persons, an increase of 41,190 people (+93%), representing an average annual increase of 2.2%. Employment in the town is projected to increase by 18,500 jobs to 30,470, a total increase of more than 150% and an average annual increase of 3.2%.

Figure 5-1: Simcoe County Land Needs Assessment - Bradford West Gwillimbury Land Needs

LAND NEEDS ASSESSMENT					
Community Area (Housing) Needs					
Policy Area	Single/Semi	Row	Apartment	Total	Community Area Assumptions
Delineated Built Up Area (BUA)					
Unit Allocation (%)	2.0%	19.0%	79.0%	100%	BUA Intensification Rate: 45%
Unit Allocation (#)	149	1,412	5,865	7,425	BUA Units Needed: 7,425
Supply Potential					
In Planning Process	58	347	280	685	DGA Persons and Jobs per ha: 55
On Vacant Land	0	0	0	0	Resulting DGA Land Need (ha): (245.0)
Accessory Units	283	0	0	283	
Total	341	347	280	968	Rural Share of Growth: 10%
Intensification Potential Required (Shortfall)	192	(1,065)	(5,585)	(6,457)	
Designated Greenfield Area (DGA)					
Unit Allocation (%)	86.6%	3.4%	10.0%	100%	Employment Area Needs
Unit Allocation (#)	6,430	252	743	7,425	
Supply Potential					
In Planning Process	420	146	122	688	Long-Term Land Supply (ha) 41.9
On Vacant Land	0	0	0	0	Provincial Strategic Employment Area (ha) 199.9
Total	420	146	122	688	Total Land Supply (ha) 241.8
Unit Excess (Shortfall)	(6,010)	(106)	(621)	(6,737)	
Rural Lands					
Unit Allocation (%)	68.3%	25.2%	6.5%	100%	Assumed Employment Land Density (jobs/ha) 20
Unit Allocation (#)	1,127	416	107	1,650	Employment Land Capacity (jobs) 4,836
Supply Potential					
In Planning Process	1,281	473	122	1,876	Employment Land Employment Growth, 2021 - 2051 (jobs) 7,141
On Vacant Land	0	0	0	0	Sufficiency of Supply (ha) (115.3)
Total	1,281	473	122	1,876	
Unit Excess (Shortfall)	154	57	15	226	
Market Housing Mix (According to Market Demand):	73%	13%	15%	100%	Surplus (Shortfall) of jobs (2,306)
Housing Mix in Planning Process:	38%	35%	27%	100%	
Policy Housing Mix (Required to Achieve Growth Plan):	47%	13%	41%	100%	

SOURCE: Hemson Consulting Ltd, Simcoe County Municipal Comprehensive Review

These population projections are then translated into housing unit projections based on the rates at which different age groups form households. The results of this analysis in the Town, as shown in Figure 5-1, identified the need for 16,500 dwelling units to accommodate this residential population growth. These units are then allocated to different policy areas. Firstly, 10% of unit growth, or 1,650 units, was allocated to rural lands, with the remaining 14,850 units split evenly between the Designated Greenfield Area and the Delineated Built-up Area.

This even split is due to the decision to pursue a 45% intensification rate. This intensification rate is an increase from previous County growth management work and represents a decision made by the County, as the Growth Plan allows for Simcoe County to determine its own intensification rate through the MCR process “based on maintaining or improving upon the minimum intensification target” contained in its Official Plan. In the case of Bradford-West Gwillimbury, the intensification rate was increased from a current level of 40%.

Different unit types require different amounts of land, and the total unit allocations are then broken down into three different unit categories; Single/Semi, Row, and Apartment. The LNA Methodology outlines that affordability, a mix of housing types, the potential for intensification and “ensuring the provision of a market-based supply of housing to the extent possible” are all important factors to consider when evaluating the potential unit mix and other policy decisions, such as the intensification rate. It goes further to acknowledge:

For the purposes of alternative intensification and designated greenfield area density targets, the ability to provide a market-based supply of housing is an important consideration in determining whether a target can be achieved.

The housing mix that results from the County’s assessment and analysis differs for the BUA and the DGA. The BUA is expected to develop as 2.0% Single/Semi detached units, 19.0% row units, and 79% apartment units. The DGA is envisioned to develop as 86.6% Single/Semi detached units, 25.2% row units, and 6.5% apartment units.

Following the allocation of units to policy areas the potential supply of units is then evaluated. In the Town’s BUA the County identified 685 units in the planning process, with no additional capacity to support units on currently vacant land. This resulted in a shortfall of 6,457 units within the built-up area. The DGA was found to have 688 units in the planning process with no additional potential to support units on currently vacant land. This resulted in a shortfall of 6,737 units in the greenfield area. No commentary or explanation was provided as to how the built-up area will accommodate the 6,457-unit shortfall in the absence of a supply of vacant lands.

As a result of the unit shortfall in the DGA, the land needs assessment finds that the Town has a need for an additional 245 hectares of greenfield lands, based on a greenfield density target of 55 persons and jobs per hectare. There is no explanation for how this density target was arrived at, or how many

jobs were added to the population to determine the need the additional 245 hectares of greenfield community land. Market-Based Demand for Housing

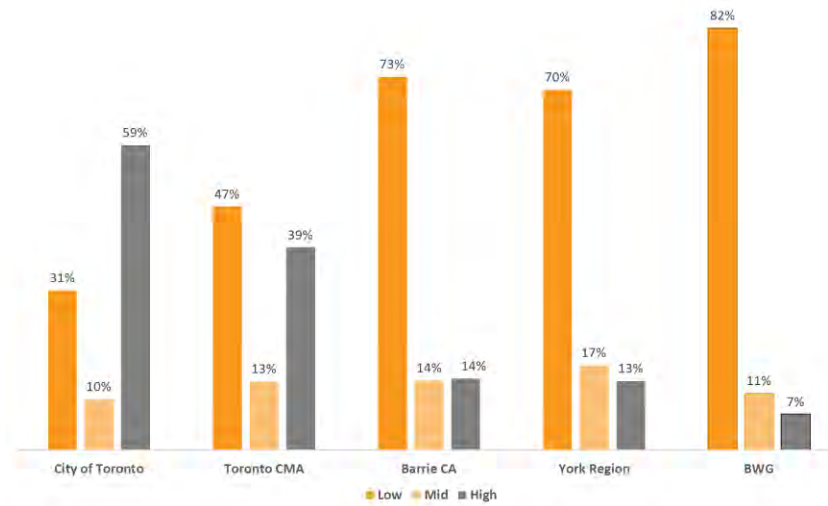
To effectively forecast future land and housing needs the LNA Methodology directs municipalities to plan for an appropriate range and mix of housing options to accommodate market-based demand for housing. References to “market-based” housing policy are also included in the PPS, with the Growth Plan referring to “market demand” for housing. The LNA Methodology is the most explicit:

“Conformity with the intensification and designated greenfield area density targets is confirmed or adjustments are made to ensure conformity with the Plan. This may require adjusting the mix of housing types while ensuring the provision of a market-based supply of housing to the extent possible. For the purposes of alternative intensification and designated greenfield area density targets, the ability to provide a market-based supply of housing is an important consideration in determining whether a target can be achieved.”

While we understand the need to adjust the housing mix away from what would typically be considered market demand to meet certain policy requirements, the 45% intensification target proposed in the County LNA results in significant deviation from the Growth Plan requirement for a broad mix of housing options and a consideration for market demand.

As outlined in the LNA Methodology, in order to forecast housing needs the population projections must consider household formation rates and propensities to occupy particular dwelling types. Historically, the residential market in Simcoe has demonstrated a strong preference for ground related housing types when compared to the relatively more urban municipalities closer to the Toronto downtown core. As shown in Figure 5-2, the City of Toronto accommodates residents through a very different housing mix than York Region, its neighbouring regional municipality. Dwelling type propensity in the City of Toronto indicates that nearly 60% of residents’ demands for housing are met through apartment units. In the Toronto CMA, which includes much of the central GGH, this proportion is 39%, with 47% of residents residing in low density unit types. In the Town of Bradford West Gwillimbury this proportion is only 7%, with 82% of residents living in low-density dwelling types.

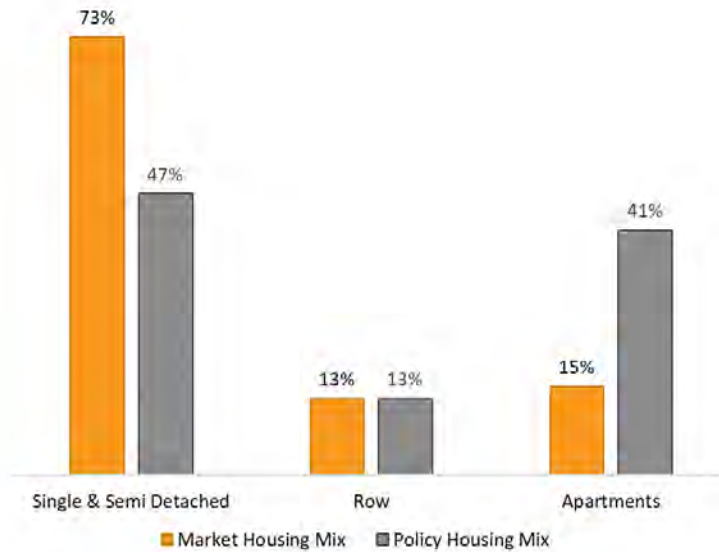
Figure 5-2: Dwelling Type Preferences in Selected GGH Geographies



SOURCE: urbanMetrics inc., from Statistics Canada Census 2016

While the Growth Plan prioritizes intensification and the efficient utilization of existing lands and infrastructure, the “policy housing mix” proposed in the County LNA presents an approach to accommodating residents in the Town that does not appear to be feasible. As shown in Figure 5-3, the market housing mix represents a housing mix similar to the existing dwelling type propensities of York Region, itself an urbanizing and growing municipality. In contrast, the policy housing mix is more similar to the Toronto CMA, which represents the core of the GGH and includes the City of Toronto, one of Canada’s urban hubs and one of the fastest growing cities in North America.

Figure 5-3: BWG Market Based and Policy Based Housing Mix, 2051



SOURCE: urbanMetrics inc., based on the Simcoe County Land Needs Assessment prepared by Hemson Consulting Ltd.

The Shortfall of Land Within the Built-up Area

The County LNA allocates 7,425 new households, 45% of household growth, to the Built-Up Area (“BUA”) of Bradford West Gwillimbury. The allocation of these units is shown in both Figure 5-3 and Figure 5-4. The allocation of units is evaluated against the available supply of units or land to accommodate units, which includes those units under application as well as those that could be accommodated on vacant lands. It is notable that the County LNA has identified no remaining vacant lands to support unit growth within the currently delineated Built-up Area. As shown, this results in a shortfall of 6,458 units that would need to be accommodated through the intensification or wholesale redevelopment of existing sites within the BWG Built-up Area.

Based on an evaluation of recently completed and currently active developments across BWG and Simcoe County we have utilized unit densities of 50 units per net hectare for row units and 100 units per net hectare for apartment units to evaluate the impact of the unit shortfall from a land supply perspective. These densities are conservative insofar as there are many active or recently completed developments with less units per net hectare that would further increase the land required to support 6,458 units. As shown, the shortfall of 1,065 row units leads to a need to redevelop or intensify some 21 hectares of the existing Built-up Area, while the shortfall of 5,585 apartment units results in the redevelopment of some 56 hectares.

In total, to accommodate the 45% intensification rate utilized in the County’s LNA the Town will require the redevelopment of 77 net hectares of land within the BUA. These redevelopment sites will

need to be on lands designated as *Medium Density Residential, High Density Residential, or Downtown Bradford*.

Figure 5-4: BUA Land Needs - County LNA

Built Up Area	Single/Semi	Row	Apartment	Total
Unit Allocation %	2.0%	19.0%	79.0%	100%
Unit Allocation #	149	1,412	5,865	7,425
<u>Supply Potential</u>				
In Planning Process	58	347	280	685
On Vacant Land	0	0	0	0
Accessory Units	283	0	0	283
Total	341	347	280	968
Intensification Required (Shortfall)	192	-1,065	-5,585	-6,458
Density (units per net ha)		50	100	
Net ha Required		21 ha	56 ha	77 ha

SOURCE: urbanMetrics inc., based on the Simcoe County Land Needs Assessment prepared by Hemson Consulting Ltd. Numbers may not add due to rounding.

It does not appear that the County LNA has undertaken the analysis to determine if this rate of intensification is feasible. If this shortfall of units cannot be physically accommodated within the BUA it will result in housing shortages in the Town, further eroding housing affordability and resulting in an inability for BWG to meet the 2051 population target.

Intensification Target

The intensification target for Bradford West Gwillimbury has been increased from 40% in the existing County Official Plan to 45% in the County LNA. The higher intensification rate exacerbates an already significant diversion from both the market-based demand for housing and the observed historical development patterns in the Town and the County. In addition, the higher intensification target contradicts the conclusions of the final update to the Simcoe County Residential Land Budget prepared by Hemson Consulting Ltd on March 23rd 2021. Hereafter referred to as the Hemson Memo, the addendum to the land budget update states:

“There is an insufficient supply in both the DGA and intensification areas. There is, however, excess supply in the rural areas of the municipality. A detailed review of the land supply in Bradford West Gwillimbury will be undertaken as part of the County’s MCR process”.

This commentary is accompanied by several tables that outline the 2031 population projections from the previous Growth Plan, the corresponding demand for housing, and the potential supply of housing units. At the time of this land budget update in March 2021 the County identified a potential unit

supply in the Bradford BUA of 1,527 units and a potential unit supply in the DGA of 1,035 units. This results in a total unit supply potential of 2,562 units.

The supply tables prepared as part of the County’s LNA indicate a potential BUA unit supply of 968 units, with a DGA supply of 688 units. This results in a total supply of 1,656 units, 906 units less than identified some 6 months earlier. These units are not accounted for in active development applications or completions tracked by CMHC. It is unclear what factors influencing this unit potential changed between the land budget exercise and the County LNA, and it is also unclear how this significant increase in the unit shortage within the Built-Up Area supports an increase in the intensification rate.

Intensification Feasibility

In addition to identifying opportunities to support intensification it is important to consider an economically feasible and community supported level of development. As illustrated in Figure 4-8, average unit completions in the Town over the past 20 years have fluctuated significantly between 112 and 672 units per year, with an overall increasing trend evident in recent years. To accommodate projected unit growth as outlined in the County LNA the Town would require the development of 550 units every year.

The feasibility of this scale of development is particularly concerning for higher density apartment units. CMHC has tracked the completion of 45 non-institutional apartment units over the last 20 years, with the Town now expected to build approximately 224 of such units per year over the next 30 years to meet demand. As identified in the LNA and shown in Figure 5-4, there are no vacant lands with the BUA capable of supporting these units, meaning that some 5,585 units, equating to approximately 56 hectares, will have to be constructed in Downtown Bradford through commercial redevelopments, intensification in proximity to Bradford GO station, or in the limited High Density residential lands identified in the Town’s proposed Official Plan update.

Community Area Land Needs in Southern Regional Market Area

The municipalities of Adjala-Tosorontio, Essa, New Tecumseth, Innisfil and Bradford West Gwillimbury, together comprise the Southern Regional Market Area Municipalities. The Land Needs Assessment identifies a combined DGA land need of 701.0 hectares based on the individual land needs summaries for the Southern Regional Market Area. However, the Public Open Houses on the Draft Land Needs Assessment identifies Community Area land needs deficit of 350 hectares for the Southern Regional Market Area. There is no explanation for the difference between the 701-hectare expansion identified in the land needs summaries and the 350-hectare expansion identified in the presentation on October 5th, 2021.

6.0 Evaluation & Conclusions

6.1 MCR Expansion Criteria

Section 2.2.8 of the Growth Plan, 2020 refers to *settlement area* Boundary Expansions. It identifies the scenario in which a *settlement area* boundary expansion may occur:

A settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that...based on the minimum intensification and density targets in this Plan and a land needs assessment undertaken in accordance with policy 2.2.1.5, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the designated greenfield area.

The identification of a significant unit shortfall in both the BUA and the DGA in the County's LNA demonstrates that, even when exceeding the minimum intensification targets in the Plan, there are not sufficient opportunities to accommodate forecasted growth through intensification and unit development in the existing designated greenfield area. As such, a boundary expansion will be required to accommodate residential growth to 2051.

2.2.8 3) then outlines the criteria by which the feasibility of a proposed expansion can be evaluated and how a municipality can identify the most appropriate location for the proposed expansion. It considers the availability of infrastructure and public service facilities, the ability to tie into existing wastewater or stormwater master plans, the avoidance of prime agricultural areas and a prohibition on development in Specialty Crop Areas, compliance with the minimum distance separation formulae, the meeting of requirements in environmental conservation and protection plans, and other policy factors.

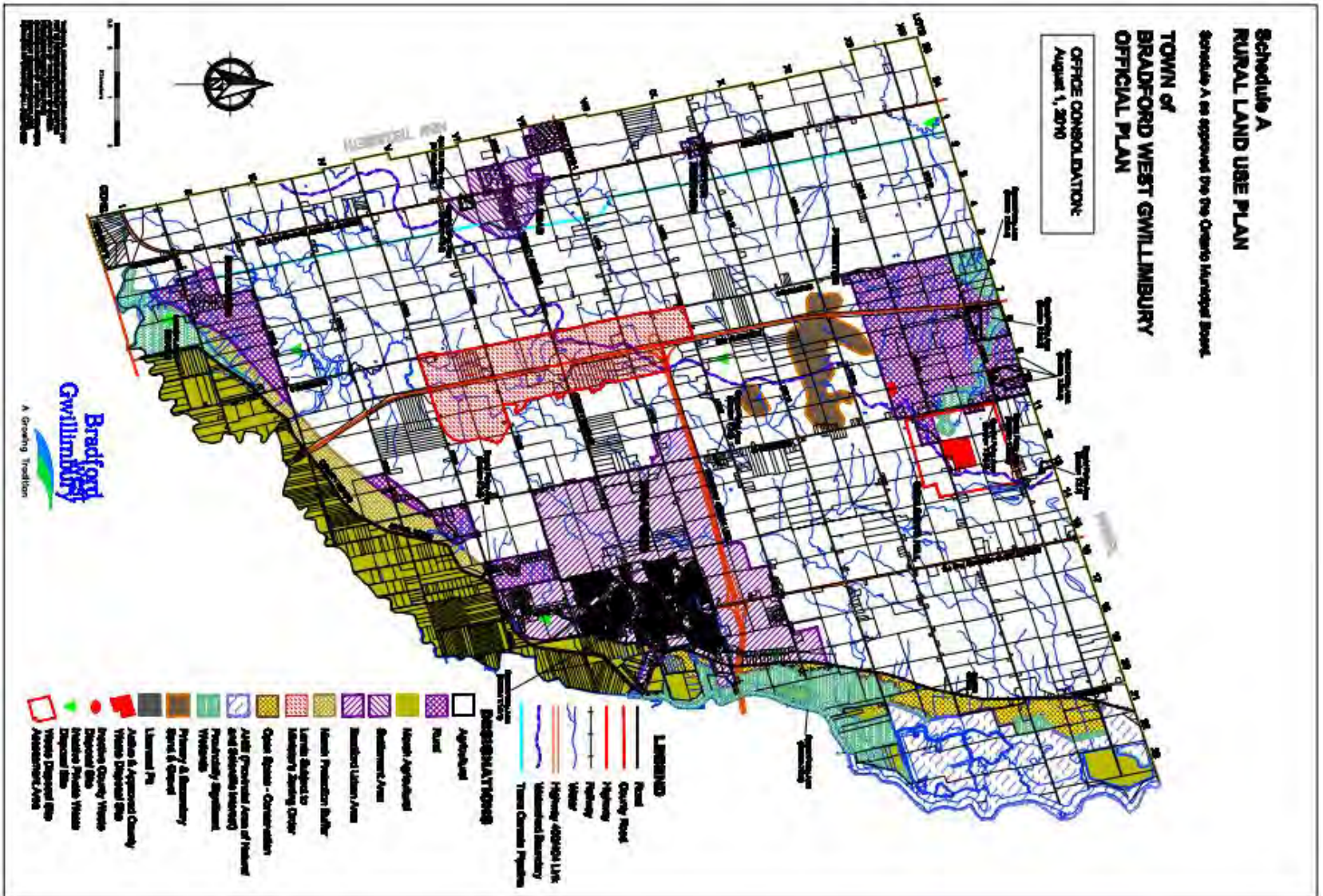
We believe the subject site represents some of the most suitable lands in the vicinity of the Settlement Area to be considered for a potential boundary expansion. It is very well served by the existing transportation network and sits less than a kilometre from fully serviced residential neighbourhoods that are within the Built-up Area, simplifying the extension of servicing and mitigating the cost. In addition, 10 Sideroad to the west of the subject site is identified as a Major Arterial roadway in the Town's proposed Official Plan update, and adherence with good planning principles would extend the settlement area boundary westward past this significant component of the transportation network.

6.2 Conclusions

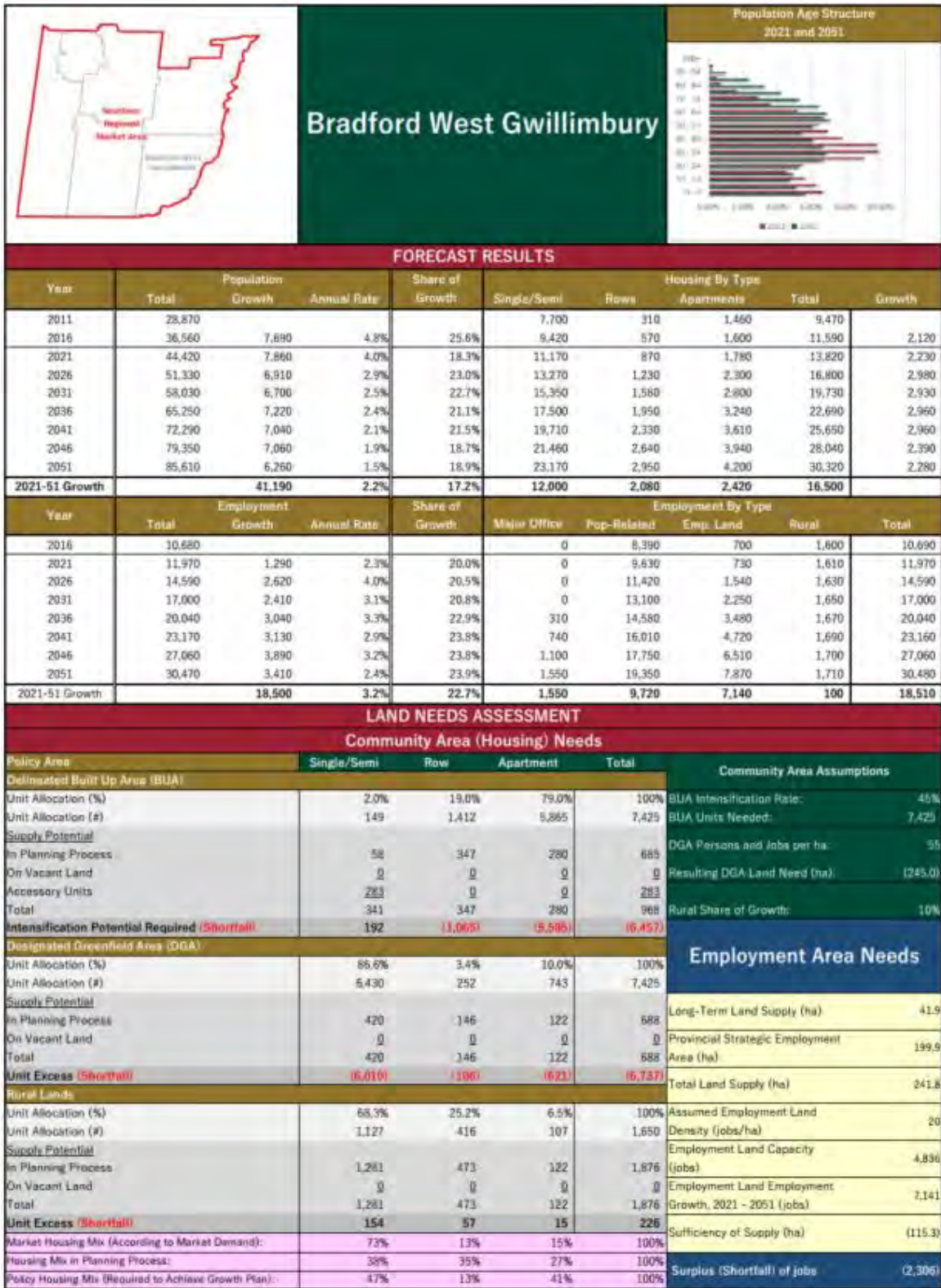
- Upon reviewing the identified background materials, the Town's proposed Official Plan update, and the County's Land Needs Assessment, it is our opinion that the Town of Bradford West Gwillimbury will require a settlement area boundary expansion to accommodate projected growth to 2051.

- It is evident that the policy-based housing projections for the Town overly deviate from a market-based evaluation of demand for housing. The adjustment of several factors, including the intensification rate, are required to narrow the significant gap between the market and policy-based projections.
- It is not clear that the County's land needs assessment has evaluated the feasibility of accommodating the identified 6,457-unit shortfall within the existing Built-up Area through intensification. This scale of redevelopment would require the completion of some 224 apartment units annually over the projection period, a scale of development exponentially larger than what has historically occurred in the Town and one that is likely unattainable.
- The County's Land Needs Assessment implements a policy-based housing mix that diverges significantly from what could be considered market-based demand for housing unit types. Hemson Consulting Ltd. identified a market housing mix of 73% single and semi-detached units, 13% row units, and 15% apartment units, yet utilizes a housing mix that is only 47% single and semi-detached, maintains 13% row units, and increases apartment units from 15% to 41% of total units.
- In our opinion, the Land Needs Assessment makes the assumption that apartment units are a direct substitute for single and semi-detached units. This is not the case, particularly for families, which dominate the Bradford-West Gwillimbury housing market. For this reason, the forced shift from single and semi-detached units is contrary to market demand and is unsustainable in this community.
- The County LNA was not able to identify any vacant lands within the Built-up Area capable of supporting this redevelopment. This means that the Town will be obliged to redevelop approximately 77 hectares of its Built-up Area when evaluating the land supply impact of these units using average development densities.
- It is our opinion that a lower intensification rate will be required for the Town due to the lack of intensification opportunities within the built-boundary. As a result, this would require even more land to be added outside of the settlement area boundary to accommodate, at minimum, additional mid-density units in lieu of the level of intensification prescribed by the Land Needs Assessment.
- It is our opinion that an expansion of the Settlement Area Boundary to the south and east meets the expansion criteria outlined in the LNA Methodology and can provide needed land to accommodate a wide range of housing types while leveraging existing and planned arterial roadways, proximity to waste and storm water infrastructure, and an avoidance of specialty crop areas.

Appendix A Land Use Maps



Appendix B Simcoe County LNA



SOURCE: County of Simcoe Land Needs Assessment, prepared by Hemson Consulting Ltd.



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SENT VIA EMAIL

File: P-3266

November 11, 2021

The County of Simcoe
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, Ontario
L9N 1X6

**Attention: Mr. Dan Amadio, Manager of Planning
Mr. Greg Marek, Manager of Planning**

**RE: County of Simcoe Municipal Comprehensive Review, Draft Land Needs
Assessment
GB (Bradford 2) Inc.
3174 5th Line
Town of Bradford West Gwillimbury**

Dear Mr. Amadio and Mr. Marek,

KLM Planning Partners Inc. is the land use planning consultant for GB (Bradford 2) Inc. (the "client"), the owners of 3174 5th Line in the Town of Bradford West Gwillimbury ("Town"). The lands are approximately 34.21 hectares (84.53 acres) in size and are bounded by 5th Line in the south, 10th sideroad in the east, a mid-concession lot line between Lots 9 and 10, Concession 5 in the west and a mid-concession lot line between Concessions 5 and 6 in the north ("Subject Lands").

On May 28, 2021, we provided a letter to the County Clerk for the County's Municipal Comprehensive Review ("MCR") Special Meeting, requesting the consideration of our client's lands for a future expansion to the Settlement Area of Bradford to support the on-going desirable growth in the County.

We have now reviewed the County's Draft Land Needs Assessment undertaken pursuant to the Provincial methodology, and note that additional Community Area Land and additional Employment Area land is required within the Town of Bradford West Gwillimbury in support of a proposed 2051 population and employment forecast of 85,610 persons and 30,470 jobs, respectively. On this basis, the table summarizing land needs for Bradford West Gwillimbury

identifies the need for an additional 245 hectares of Community Area land and 115.3 hectares of Employment Area Land to accommodate the 2051 forecasts.

On behalf of our client, urbanMetrics have also completed a review of the County's Draft Land Needs Assessment and have provided detailed technical review comments in the attached.

We appreciate the opportunity to comment and we look forward to continuing to work with the County through the MCR process.

Yours very truly,

KLM PLANNING PARTNERS INC.



Keith MacKinnon, MCIP, RPP
Partner



Tim Schilling, MCIP, RPP
Senior Planner

Copy: David Parks, Director of Planning, Economic Development, Transit and Airport Services, County
Alan Wiebe, Manager of Community Planning, Town of Bradford West Gwillimbury
GB (Bradford 2) Inc.



3174 LINE 5

Boundary Expansion Study

Bradford West Gwillimbury, Ontario

Prepared for GB (Bradford2) Inc.

November 2, 2021



This document is available in alternative formats upon request by contacting:

info@urbanMetrics.ca
416-351-8585 (1-800-505-8755)



November 2, 2021

Attention: Mohamad Al Ashkar
GB (Bradford 2) Inc.
145 Reynolds Street
Suite 400,
Oakville, Ontario
L6J 0A7

Dear Mr. Ashkar:

RE: 3174 Line 5 – Boundary Expansion Study (Bradford West Gwillimbury, Ontario)

urbanMetrics is pleased to provide this study to examine the justification for a settlement boundary expansion incorporating your lands at 3174 Line 5 in Bradford-West Gwillimbury. The purpose of this study is to review the County's municipal comprehensive review work and to provide our opinion as to whether the proposed settlement boundary expansion to incorporate the GB (Bradford2) lands was justified based on Provincial and municipal planning policies.

Based on our research and analysis, we would conclude that a settlement boundary expansion will be required to accommodate the growth projected in the County's Land Needs Assessment and that the subject lands would represent a strong candidate for inclusion in a boundary expansion given their location in the vicinity of the existing settlement boundary and the logical extension of growth towards the southeast of the Bradford Community.

It was a pleasure to conduct this analysis on behalf of your firm.

Yours truly,

A handwritten signature in black ink that reads "Rowan Faludi".

Rowan Faludi, MCIP, RPP, CMC, PLE
Partner
rfaludi@urbanMetrics.ca

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Executive Summary

Background

- GB (Bradford2) Inc. owns approximately 34.21 hectares (84.53 acres) in Bradford-West Gwillimbury bounded by 5th Line in the south, 10th sideroad in the east, Concession 5 in the west and a mid-concession lot line between Concessions 5 and 6 in the north (“Subject Lands”).
- The Subject Lands are currently designated “Agricultural” on Schedule ‘A’ to the currently in force Town Official Plan, 2002 (“Town OP”) and “Agricultural” on Schedule 5.1 to the County of Simcoe Official Plan, 2016 (“County OP”). The Subject Lands are also proposed to be designated ‘Agricultural’ on Schedule ‘B’ to the Town’s New Official Plan Adopted by the Town on March 2, 2021 (“New Town OP”).
- The Town of BWG has recently adopted a new Official Plan as of March 2021. This plan, however, still requires County approval. As per this plan, the subject lands are still outside of the Bradford Settlement Area boundary, but it is acknowledged that settlement boundary expansions can only be approved through a County led Municipal Comprehensive Review (MCR), which is currently underway.
- As part of its, Official Plan Review process, the County has engaged Hemson Associates to conduct a Land Needs Assessment, the results of which at the municipal level, were made public on October 1, 2021. The purpose of this study is to review the County’s MCR work and to provide our opinion as to whether the proposed settlement boundary expansion to incorporate the GB (Bradford2) lands was justified based on Provincial and municipal planning policies. In particular,
 1. Whether the boundary expansion is required to accommodate growth in BWG to 2051;
 2. Whether there are no other opportunities to accommodate required growth in BWG through intensification, redevelopment or within the designated greenfield area;
 3. Whether the boundary expansion would adversely impact the County’s intensification and density targets;
 4. Whether the location is appropriate in terms of taking advantage of existing municipal infrastructure and represents the logical expansion of the development area of the Town.
 5. That the boundary expansion will assist the Town achieve its housing goals.

Demographic and Market Profile

- Population growth in Bradford West Gwillimbury has outpaced most other municipalities in Simcoe County over the last 20 years, due in part to its location in proximity to employment opportunities in York Region, Peel Region, and the City of Toronto, as well as being the only Simcoe County municipality with a GO Train station within its Town boundaries.
- The pace of migration to Simcoe County from other municipalities in the Greater Golden Horseshoe has accelerated in recent years. The stronger migration to Simcoe County is due, in part, to the limited supply of ground-related housing (single-detached, semi-detached and row units) in the core of the Greater Golden Horseshoe.
- In comparison to Simcoe County, the Town of Bradford West Gwillimbury has a larger share of the population in the under 15 and 35 to 44 age cohorts. This suggests that Bradford West Gwillimbury has been the beneficiary of recent in-migration among young families. These age groups also have strong household formation rates and a general preference for larger, less dense dwelling types.
- The Town of Bradford West Gwillimbury historically accommodates approximately 10% of Simcoe County’s employment base. Schedule 3 of the Growth Plan, 2020 suggests that employment growth in the Town is likely to keep pace or exceed the rate of population growth and the future balance between employment and population is likely to settle into a higher activity rate than has been historically experienced in the Town.
- A significant proportion of the employed population of the Town commutes southward to municipalities such as York Region and the City of Toronto and are choosing to live in Bradford West Gwillimbury for reasons other than immediate access to employment. In addition, Simcoe County historically experiences significant annual net in-migration from other areas in the Greater Golden Horseshoe. It is our opinion that the availability of lower density unit types at relatively more affordable prices is a significant factor driving these trends.

Simcoe County Land Needs Assessment

- As per the Simcoe County Land Needs Assessment, Bradford West Gwillimbury is expected to accommodate 85,610 persons and an employment base of 30,470 employees by 2051. This represents a growth of 41,190 persons over the 30-year period between 2021 and 2051, approximately a 93% increase. As per the Growth Plan, the County population and employment targets should be considered minimums and can be increased through a municipal comprehensive review, such as the one currently being conducted by Simcoe County.

- The previous update to the Simcoe County Land Budget completed in March 2021 by Hemson Consulting Ltd. identified that the Bradford West Gwillimbury Built-up Area and Designated Greenfield area did not contain sufficient lands to accommodate residential unit growth to 2031.
- The Simcoe County Land Needs Assessment prepared in October 2021 by Hemson Consulting Ltd. concluded that Bradford West Gwillimbury will require 245 hectares of new greenfield lands and faces a shortfall of 6,457 units within the Built-up Area to accommodate projected unit growth to 2051.
- The Simcoe County LNA utilizes a 45% intensification rate for Bradford West Gwillimbury. This is an increase over the existing 40% rate utilized in the Simcoe County Official Plan. As a result, the Town will be required to redevelop approximately 77 hectares of the existing Built-up Area to accommodate the 6,457-unit shortfall. As per the Growth Plan policies for Simcoe County, the County is only required to maintain or “improve” the intensification rate in its existing Official Plan. The increase in the rate is not based on a Provincial policy requirement.
- The County’s Land Needs Assessment implements a policy-based housing mix that diverges significantly from what could be considered market-based demand for housing unit types. Hemson Consulting Ltd. identified a market housing mix of 73% single and semi-detached units, 13% row units, and 15% apartment units, yet utilizes a housing mix that is only 47% single and semi-detached, maintains 13% row units, and increases apartment units from 15% to 41% of total units.
- In our opinion, the Land Needs Assessment makes the assumption that apartment units are a direct substitute for single and semi-detached units. This is not the case, particularly for families, which dominate the Bradford-West Gwillimbury housing market. For this reason, the forced shift from single and semi-detached units is contrary to market demand and is unsustainable in this community.
- The supply tables prepared as part of the County’s LNA indicate a potential BUA unit supply of 968 units, with a DGA supply of 688 units. This results in a total supply of 1,656 units, 906 units less than identified some 6 months earlier. These units are not accounted for in active development applications or completions tracked by CMHC. It is unclear what factors influencing this unit potential changed between the land budget exercise and the County LNA, and it is also unclear how this significant increase in the unit shortage within the Built-Up Area supports an increase in the intensification rate.
- The municipalities of Adjala-Tosorontio, Essa, New Tecumseth, Innisfil and Bradford West Gwillimbury, together comprise the Southern Regional Market Area Municipalities. The Land Needs Assessment identifies a combined DGA land need of 701.0 hectares based on the individual land needs summaries for the Southern Regional Market Area. However, the Public

Open Houses on the Draft Land Needs Assessment identifies Community Area land needs deficit of 350 hectares for the Southern Regional Market Area. There is no explanation for the difference between the 701-hectare expansion identified in the land needs summaries and the 350-hectare expansion identified in the presentation on October 5th, 2021.

- The subject site is approximately 40 hectares and represents some 16% of the estimated greenfield land need. Its location within 1 kilometre of the western and southern boundaries of the currently settlement area boundary means it presents an opportunity to meet a large portion of the land need through a logical and minimal expansion of the settlement area.
- The subject site is in proximity of serviced low-density residential development and the associated infrastructure and public service facilities. In addition, the site has frontage on Line 5, a roadway which is partially designated *Arterial-Major* in the Town’s proposed Official Plan update.

Summary of Findings

- In order to accommodate growth to 2051 the Town of Bradford West Gwillimbury will require an expansion of the Settlement Area boundary.
- Despite an unsubstantiated increase in the intensification rate and an overly significant deviation from market demand in the policy-based housing mix to reduce land needs, the County Land Needs Assessment still identified a need for a minimum of 245 hectares of additional Designated Greenfield Area lands to accommodate residential growth to 2051.
- There is a lack of available land to support the development of the shortfall of 6,457 units within the existing Built-up Area, and development of this nature would require an exponential increase in the scale of construction and intensification within the mature neighbourhoods of the Town.
- We estimate that if the policy-based housing mix were to be developed, some 77 hectares of already built-up area would need to be intensification, with 56 hectares developed to support high density apartment units. In our opinion, this is unrealistic and, if the existing 40% intensification rate were used, the need for urban expansion to accommodate new growth would be even greater than 245 hectares.
- The subject site at 3174 Line 5 is located in relative proximity to existing infrastructure and public service facilities, and provides the opportunity for an expansion of the settlement area boundary that maintains a logical boundary, efficiently utilizes existing infrastructure assets, avoids development on Specialty Crop Areas, and accommodates a range of housing types.

Conclusion with Respect to the Proposed Boundary Expansion

Based on a review of Provincial and municipal planning policies related to settlement boundary expansions, this study has addressed the following questions.

1. Is the settlement boundary expansion required to accommodate growth in BWG to 2051?

The Simcoe County Land Needs Assessment, even with an aggressive intensification target, concludes that some 245 hectares of additional residential lands are required outside of the built-boundary.

2. Are there other opportunities to accommodate required growth in BWG through intensification, redevelopment or within the designated greenfield area?

The Land Needs Assessment indicates that there is not sufficient opportunities within the built boundary to accommodate the proposed intensification target of 45%. As noted above, the Land Needs Assessment has concluded that there is insufficient land within the DGA to accommodate projected growth.

3. Would the settlement boundary expansion adversely impact the County's intensification and density targets?

No. Additional DGA lands will be required even with the proposed 45% target for Bradford-West Gwillimbury. The County has established a target of 55 persons and jobs per hectare for the DGA. The developer will work with the Town to ensure that residential development on their lands achieves the appropriate density to ensure that the Town-wide DGA density target can be achieved.

4. Is the location appropriate in terms of taking advantage of existing municipal infrastructure and represents the logical expansion of the development area of the Town?

The location of the subject lands represents a logical location for a boundary expansion. The subject site at 3174 Line 5 is located in relative proximity to existing infrastructure and public service facilities, adjacent to a planned infrastructure investment, and provides the opportunity for an expansion of the settlement area boundary that maintains a logical boundary, efficiently utilizes existing infrastructure assets, avoids development on Specialty Crop Areas, and can accommodate a range of housing types.

5. Will the boundary expansion assist the Town achieve its housing goals?

The current Bradford-West Gwillimbury Official Plan does not have a Section dedicated to Housing Policy. Under the Plan Objectives are the following policies related to Housing.

3.4.3.1 To provide a variety of housing forms and opportunities throughout the Town which attempts to respond to the need for different types of accommodation for the expected changes in family composition.

3.4.3.2 Improved neighbourhood design and a broader mix of housing types and price range, built form and densities will be encouraged by the development of Community Plans, to be prepared by subdividers and reviewed in public prior to subdivision approval.

As indicated by the County's Land Needs Assessment, without a settlement boundary expansion, the Town will not be able to accommodate projected growth. This will reduce housing opportunities within the municipality and lead to housing price escalation if demand cannot be satisfied by the supply. The boundary expansion will contribute to greater housing affordability. The developer will work with the Town to prepare a housing mix for the residential development on the subject lands that reflects housing needs and policies established in the Town and County Official Plans.

2.0 Introduction

2.1 Background

urbanMetrics inc. (“urbanMetrics”) has been retained by GB (Bradford2) Inc. to analyze the potential impacts of the County of Simcoe’s (“The County”) Land Needs Assessment on the Town of Bradford West Gwillimbury (“the Town”, “BWG”), the need for an expansion of the Town’s settlement area to support population growth to the 2051 planning horizon, and the subject site’s suitability to be included in an expanded settlement area.

2.2 Purpose

The County of Simcoe has recently released a draft Land Needs Assessment as part of their ongoing Municipal Comprehensive Review (MCR) that allocates population and employment growth to BWG and other Simcoe County municipalities to 2051, based on population and employment forecasts contained in Schedule 3 of *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (the “Growth Plan”).

The purpose of this study is:

- To review the County’s Land Needs Assessment with regards to Bradford-West Gwillimbury to assess whether it appropriately estimates the land required to accommodate population and employment growth to 2051 as per the policies of the Growth Plan and the *Land Needs Assessment Methodology for the Greater Golden Horseshoe (2020)*, hereafter referred to as the LNA Methodology.
- To assess whether additional Greenfield Lands would be required to support future growth in the municipality.
- To assess the subject lands to determine their suitability to accommodate a portion of the Town’s future Greenfield Land needs as per the requirements of Provincial and municipal planning policies.

2.3 Approach

The following section describes the major work tasks undertaken by urbanMetrics in carrying out this evaluation of the Community Area Land Needs Analysis. The scope of work has been divided into the following categories:

- **Demographic and Market Profile:** To contribute towards an understanding of market demand for housing, we have reviewed current housing trends in BWG, Simcoe County, and the Greater Toronto Hamilton Area. This includes a review of the demographic characteristics of

the population in the region, propensities to live in various forms of housing, housing construction, employment trends, and commuting trends.

- **Market Demand for Housing:** Based on these demographic and market trends, as well as the Simcoe County population and employment forecasts contained in Schedule 3 of the Growth Plan, and the allocation of a portion of this population and employment to BWG, we have evaluated the LNA’s conclusions relating to the market demand for housing and the sufficiency of the policy-based allocations in the LNA at accommodating this market demand.
- **Housing Supply:** We have evaluated the available supply of unbuilt units within the Town of BWG. This land supply considers all known applications for residential units estimated to be available as of October 1, 2021, as well as vacant lands not under application but designated for residential uses.
- **Community Area Land Needs:** Taking into consideration the intensification targets and the Designated Greenfield Area (DGA) density targets we have compared market demand for housing in BWG to the identified supply of unbuilt units to determine the future need for Community Area lands to the 2051 planning horizon. In addition to this evaluation, we have analyzed the implications of the intensification rates and density targets utilized in the County’s LNA on the future development of residential units in Bradford.

2.4 Assumptions

There are several underlying and basic assumptions upon which the validity of the analysis and findings presented in this report depend. Based on our considerable experience as land economists, we recognize and appreciate the problems associated with making broad and generalized assumptions about future market conditions. Undoubtedly, deviations from historic and current trends will take place in the future. However, core assumptions are required to determine the extent of such deviations. The assumptions used in the preparation of this report are summarized below.

- While this study was prepared during the COVID-19 global pandemic, we have assumed that the economic impacts of this event, although severe, will be followed by eventual full-economic recovery. Our projections assume the return of reasonable economic stability in the Province of Ontario and the Town of New Tecumseth. However, there are emerging signs that the pandemic could have lasting implications on the geospatial distribution of employment.
- The official statistical sources utilized in our analysis (based largely on Statistics Canada, the Census of Canada and Canada Mortgage and Housing Corporation (CMHC), which have been noted where utilized) are considered sufficiently accurate for the purposes of our analysis.

If for any reason major changes occur in the marketplace which would influence the basic assumptions stated above, the recommendations and/or conclusions in this report should be reviewed considering circumstances and revised, if necessary.

3.0 Site Context

3.1 Site Characteristics & Surrounding Land Uses

The site is approximately 34.21 hectares (84.53 acres) in size and currently supports and is primarily surrounded by agricultural uses. It is our understanding that the site and none of the adjacent agricultural lands have been identified as Specialty Crop Areas. To the north there are additional agricultural lands and Line 6, which is identified as a Potential Future County Road – 30.5m road width. North of Line 6 are additional agricultural lands that abut low density residential uses on the east side of 10 Side Road. South of the subject site there are additional agricultural lands.

Figure 3-1: Surrounding Land Uses



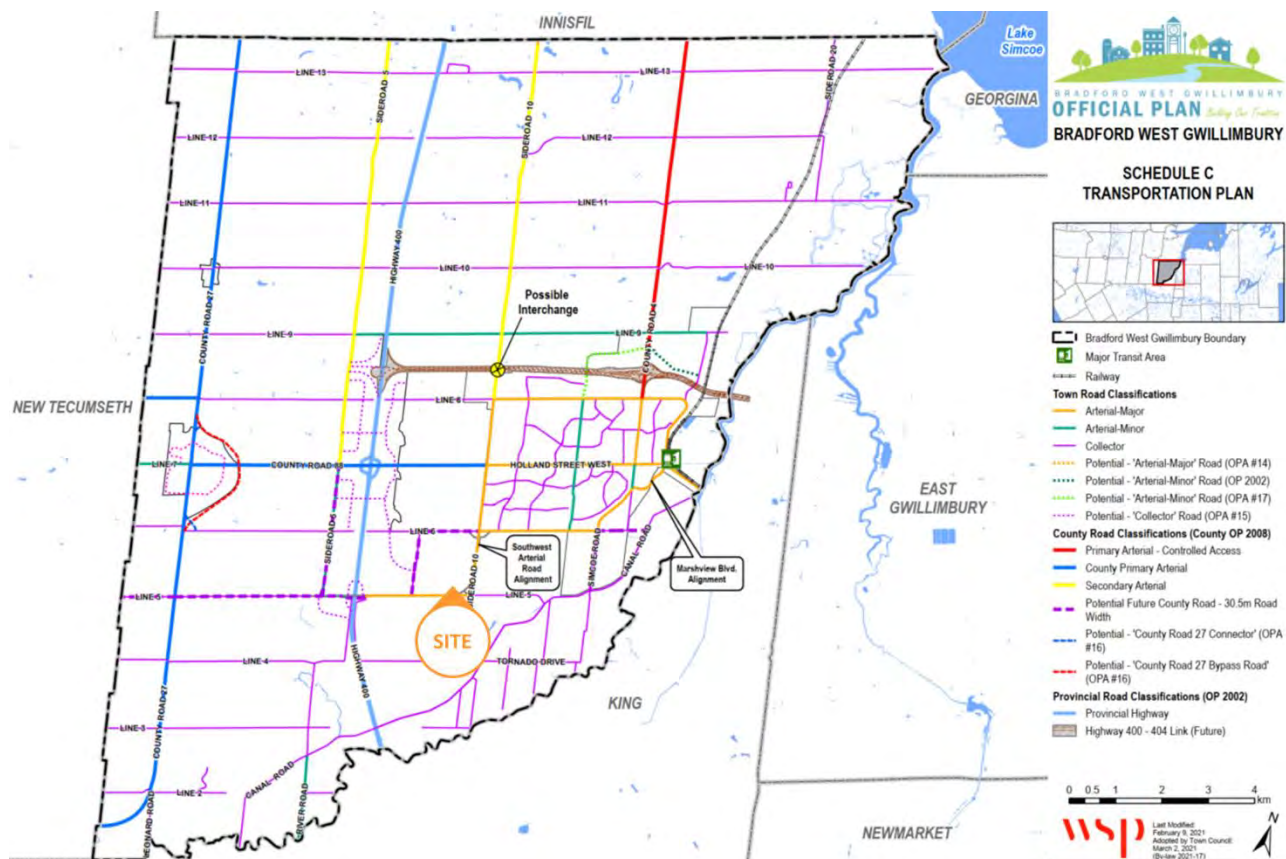
SOURCE: urbanMetrics inc., ESRI, for illustrative purposes only.

To the east there are additional agricultural lands to the east of 10 Side Road, and further east, rural residential and recreational uses at Bradford Highlands Golf Club. To the immediate west are additional agricultural lands, with Highway 400 employment lands further to the west.

3.2 Site Accessibility

The subject site is well served by the existing and planned vehicular transportation network in Bradford West Gwillimbury. Line 5 provides the site with frontage on a portion of the roadway designated as *Arterial-Major* in the draft Official Plan and supports convenient direct access to the interchange with Highway 400 and the regional transportation network. 10 Side Road, which provides frontage to the east of the site, is also designated as *Arterial-Major*, and is expected to function as a main route connecting the Town’s urban area and Highway 400.

Figure 3-2: Transportation Network - 2021 Draft Official Plan Update

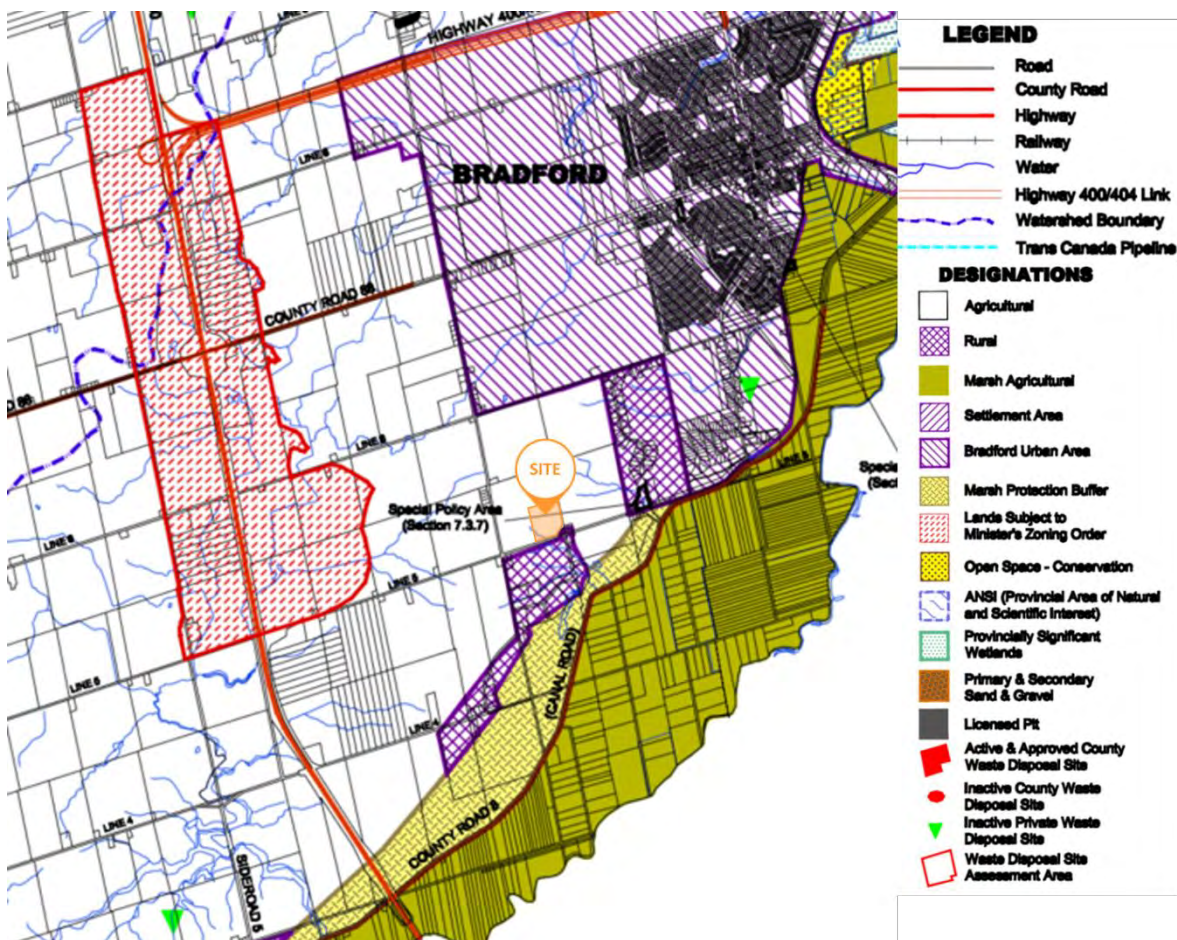


SOURCE: Town of BWG, urbanMetrics inc., for illustrative purposes

3.3 Land Use Planning Policy Framework

The Town of Bradford West Gwillimbury is current progressing a new official plan that will update the current in-force Official Plan (“OP”), which became in-force in 2002. Since that time there have been several Official Plan Amendments to bring the OP into conformity with iterations of the Growth Plan and to have regard for an updated County of Simcoe Official Plan. Under the in-force OP the subject site is designated for *Agricultural* uses and sits immediately adjacent to the *Rural* designation of the residential and recreational uses that comprise Bradford Highlands Golf Course.

Figure 3-3: Land Use - BWG Official Plan 2002

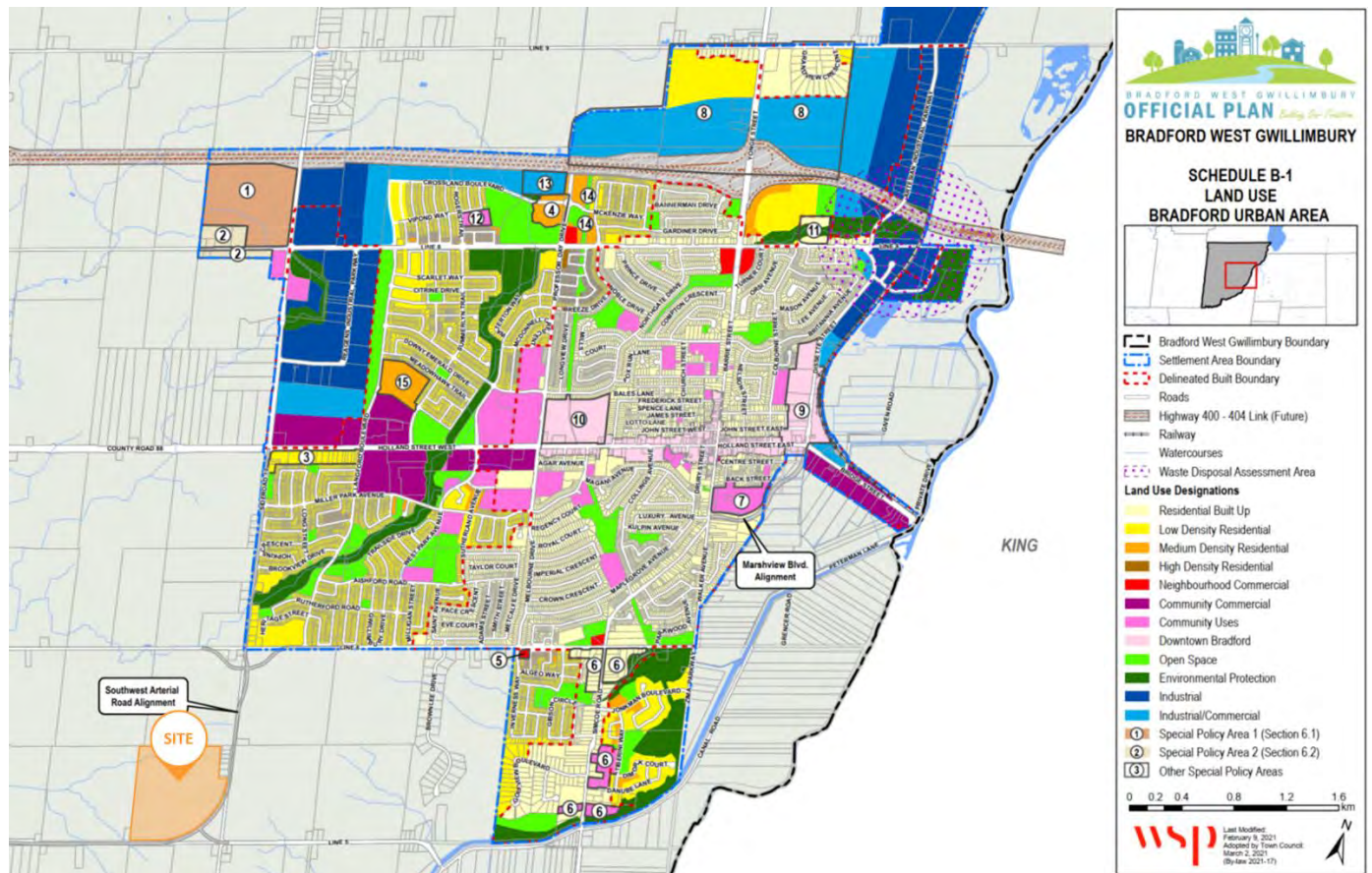


SOURCE: Town of BWG, urbanMetrics inc., Site boundaries are approximate. For illustrative purposes only.

In both the in-force Official Plan and the 2021 proposed OP update the subject site is outside of the *Settlement Area Boundary*, although it is located in proximity of the southern and eastern borders of the area, as shown in Figure 3-3 and 3-4. It sits approximately 75 metres southwest of the settlement

area and delineated built boundary. The lands to the east are designated for agricultural uses bordering rural residential development beside the Bradford Highlands Golf Course. The adjacent lands to the north, west, and south are designated for agricultural uses, with additional rural residential uses further to the south.

Figure 3-4: Land Use - Draft Official Plan Update 2021



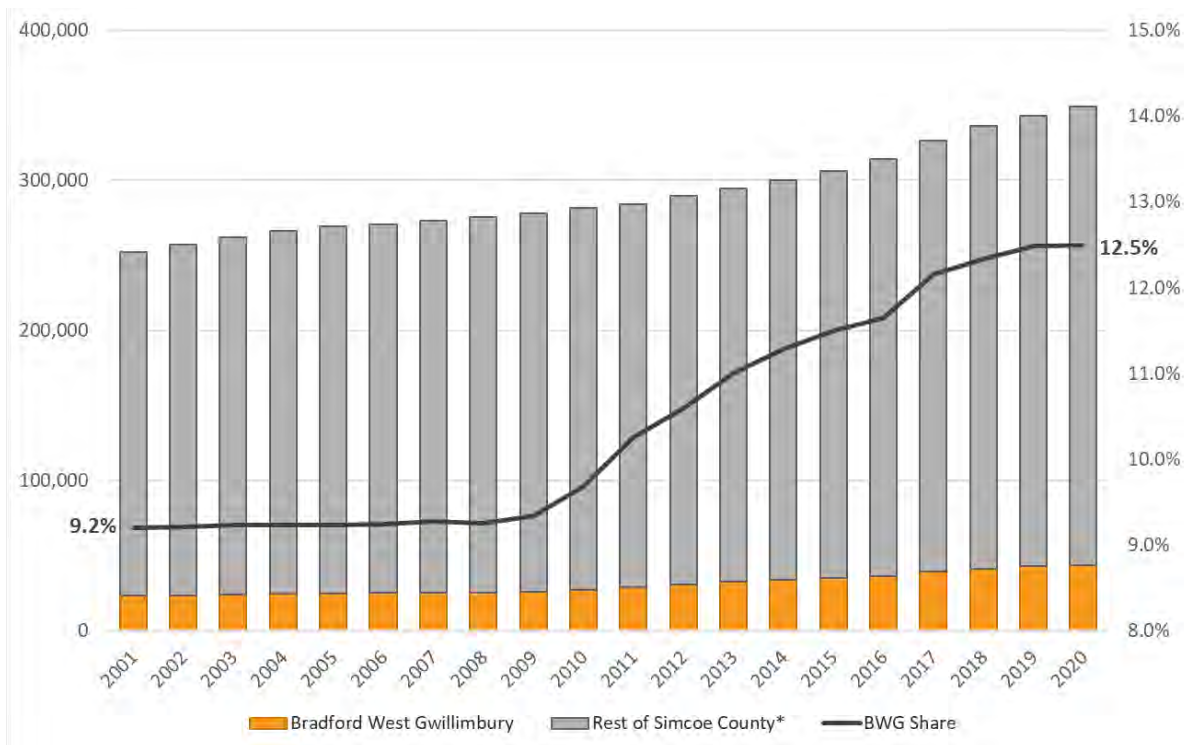
SOURCE: Town of BWG, urbanMetrics inc., Site boundaries are approximate. For illustrative purposes only.

4.0 Demographic & Market Profile

4.1 Population Growth

The Town of Bradford West Gwillimbury has recently emerged as one of the fastest growing municipalities in Simcoe County and the outer ring of the Greater Golden Horseshoe. As shown in Figure 4-1, BWG has rapidly increased as a proportion of Simcoe County’s population between 2010 and 2020. For the purposes of this analysis and to align with Schedule 3 of the Growth Plan 2020, unless otherwise noted, references to Simcoe County do not include the City of Barrie, City of Orillia, Mnjikaning First Nation 32, Christian Island 30, and Christian Island 30A.

Figure 4-1: Total Population in Bradford West Gwillimbury and Simcoe County, 1991-2020



*To be consistent with population and employment forecasts in Schedule 3 of the Growth Plan, unless otherwise noted, all references to Simcoe County exclude the City of Barrie, City of Orillia, Mnjikaning First Nation 32, Christian Island 30, and Christian Island 30A

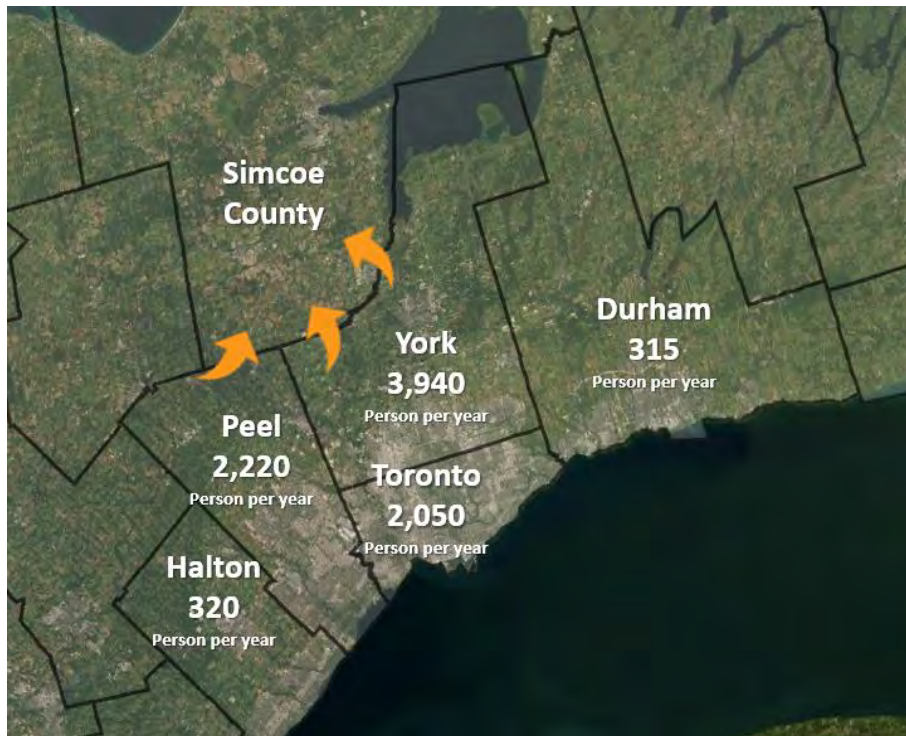
SOURCE: urbanMetrics inc., based on Statistics Canada Annual Demographic Estimates.

A significant component of population growth in Simcoe County and BWG is net migration from other neighbouring municipalities in the Greater Golden Horseshoe. This is consistent with observations by Hemson Consulting Ltd. (“Hemson”) in *Greater Golden Horseshoe: Growth Forecasts to 2051*, June 16, 2020, where they state:

The County of Simcoe, in the Outer Ring, is located due north of the GTA, to which it is connected by Highway 400. The County's economy is diverse, and includes agricultural, industrial, and tourism-related employment. Urban areas in the south have experienced rapid growth in recent years due to in-migration from the GTA and the relative proximity to jobs in York Region and Toronto. Major employers in the south include a large automotive plant (Honda) and Canadian Forces Base Borden.

The observation by Hemson is consistent with recent net migration trends to Simcoe County. Figure 4-2 shows net migration to Simcoe County (which includes Barrie and Orillia) for the period from 2012 to 2019. As shown, on average, over this period Simcoe County had positive net migration of approximately 8,860 persons per year to the County from GTA municipalities. In fact, this pace of net migration to Simcoe County has accelerated in recent years, increasing from approximately 5,700 persons in 2012 to nearly 9,700 persons in 2019. The stronger migration to Simcoe County is likely due, in part, to the limited supply of ground-related housing (single-detached, semi-detached and row units) in GTA municipalities and increasing house prices, which are impacting affordability.

Figure 4-2: Average Annual Net Migration with Simcoe County

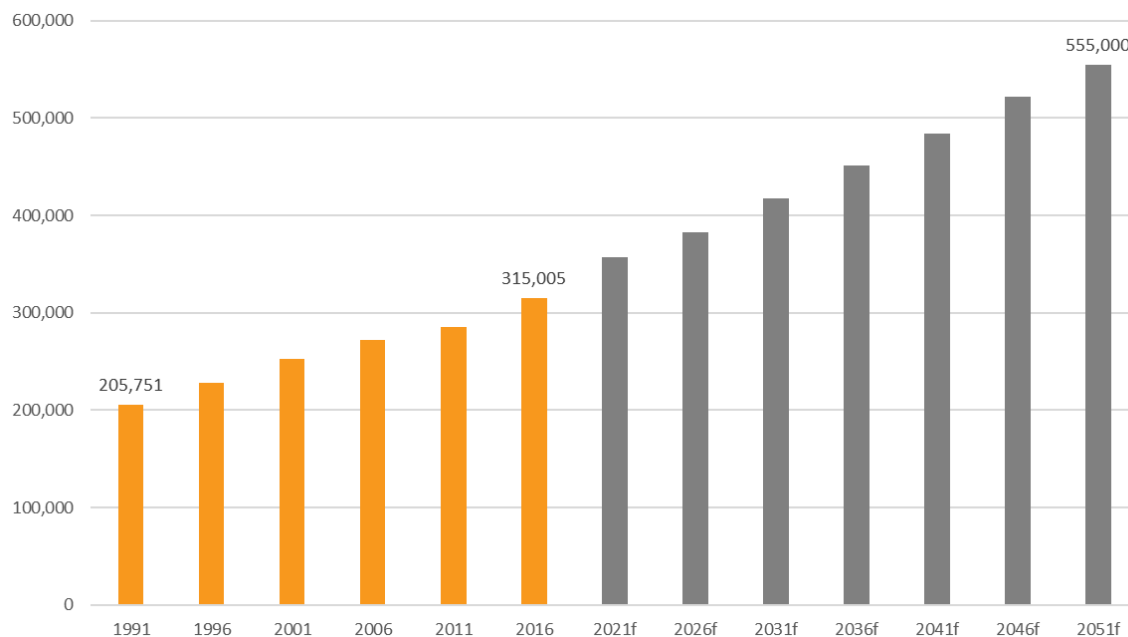


NOTE: Simcoe County includes Barrie and Orillia.

SOURCE: urbanMetrics inc. based on Statistics Canada Tax Filer Migration Data, 2012 to 2019.

Based on population growth forecasts included in Schedule 3 of the Growth Plan and shown in Figure 4-3, the Province anticipates that population growth in Simcoe County will accelerate between 2016 and 2051. In the 25 years between 1991 and 2016, the population in Simcoe County grew at an average annual pace of approximately 4,370 persons per year. By comparison, to meet the 2051 population forecast included in Schedule 3 of the Growth Plan, between 2016 and 2051, the population in Simcoe County is expected to grow at an average annual pace of approximately 6,860 persons per year. Therefore, in comparison to past trends in land absorption, it is anticipated that the pace of land absorption in Simcoe County will increase. To accommodate this growth, it will be important that the County has an adequate supply of land available to avoid housing shortages, which will reduce affordability.

Figure 4-3: Simcoe County Population, Historical & Forecast



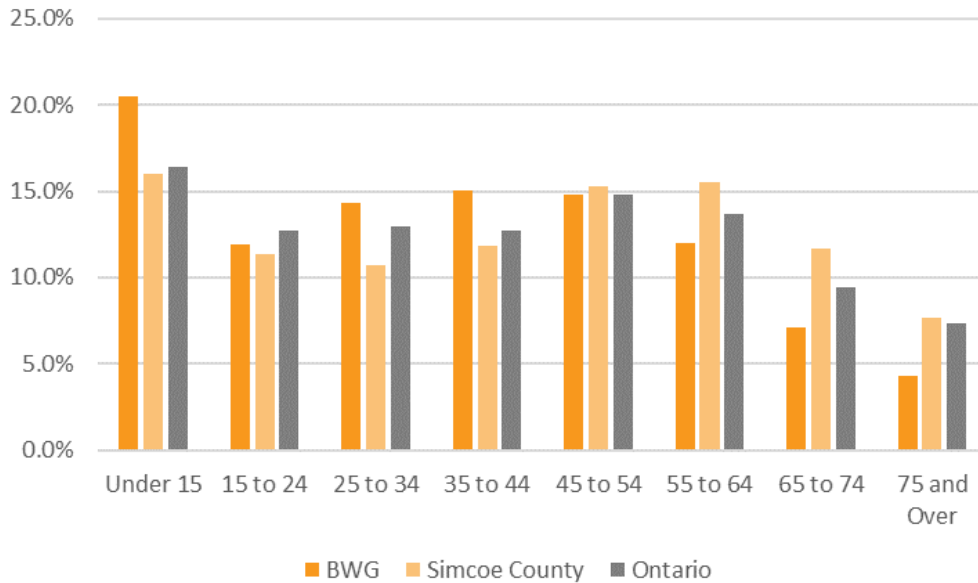
SOURCE: urbanMetrics inc. based on Hemson Consulting Ltd., *Greater Golden Horseshoe: Growth Forecasts to 2051*, June 16, 2020.

4.2 Demographic & Household Profile

Figure 4-4 summarizes the share of the population by age group in the Town of Bradford West Gwillimbury, in comparison to Simcoe County and the Province. As shown, in comparison to Simcoe County, the Town of BWG has a larger share of the population in the under 55 age cohorts and a

smaller share of the population in the age 55 and over cohort. This suggests that BWG has been the prime beneficiary of recent in-migration in the younger age cohorts. This is not surprising, as it is one of the southernmost municipalities in Simcoe County and has access to employment opportunities in York Region and the City of Toronto.

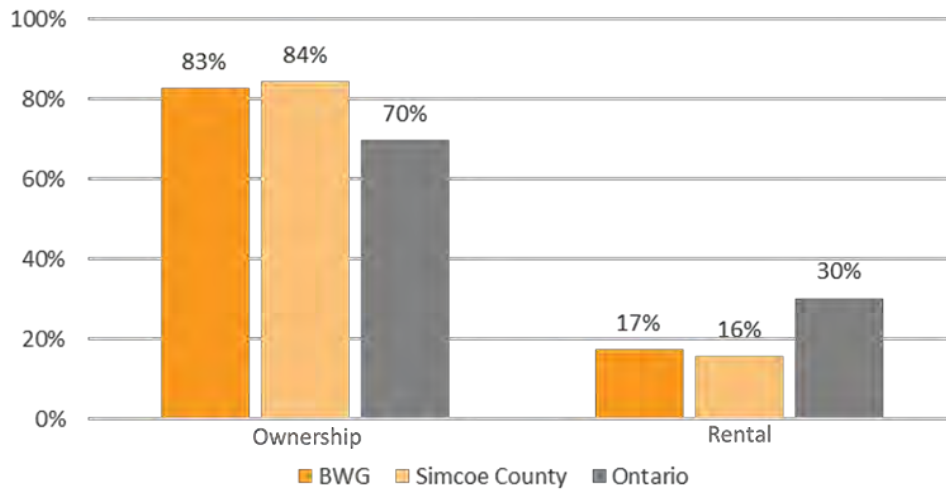
Figure 4-4: Population by Age Group, 2016



SOURCE: urbanMetrics inc. based on 2016 Census of Canada.

Figure 4-5 illustrates that at 83%, the share of owner households in Bradford West Gwillimbury is in line with Simcoe County (84%) and greater than the Province (70%). This further supports the assumption that one of the drivers of migration to Simcoe County and the Town of BWG is the opportunity to own housing at a more affordable level than can be found elsewhere in the Greater Golden Horseshoe, while still maintaining a reasonable commute to economic opportunities across the region.

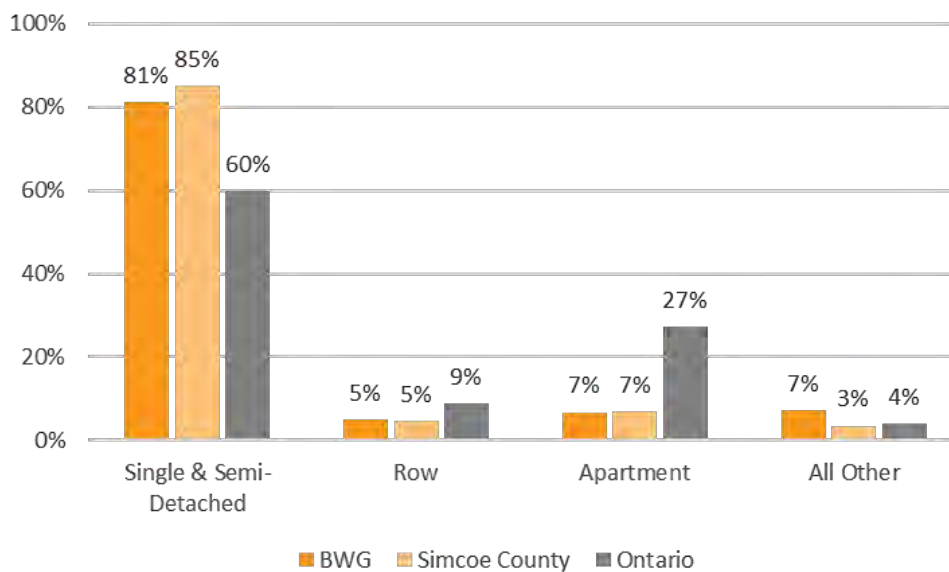
Figure 4-5: Households by Tenure



SOURCE: urbanMetrics inc. based on 2016 Census of Canada.

Relative to Simcoe County, at the time of the 2016 Census, BWG had a similar share of households residing in Row and Apartment units (Figure 4-6), a smaller proportion of single & semi-detached households, and a higher proportion of other unit types.

Figure 4-6: Households by Dwelling Type



SOURCE: urbanMetrics inc. based on 2016 Census of Canada.

Figure 4-7 shows that relative to Simcoe County, BWG had a significantly larger share of households with 4 or more persons. This is consistent with the earlier observation that Bradford West Gwillimbury had a larger share of its population in the under 55 years of age cohort, as many of these households are likely families with children still living at home.

Figure 4-7: Households by Household Size



SOURCE: urbanMetrics inc. based on 2016 Census of Canada.

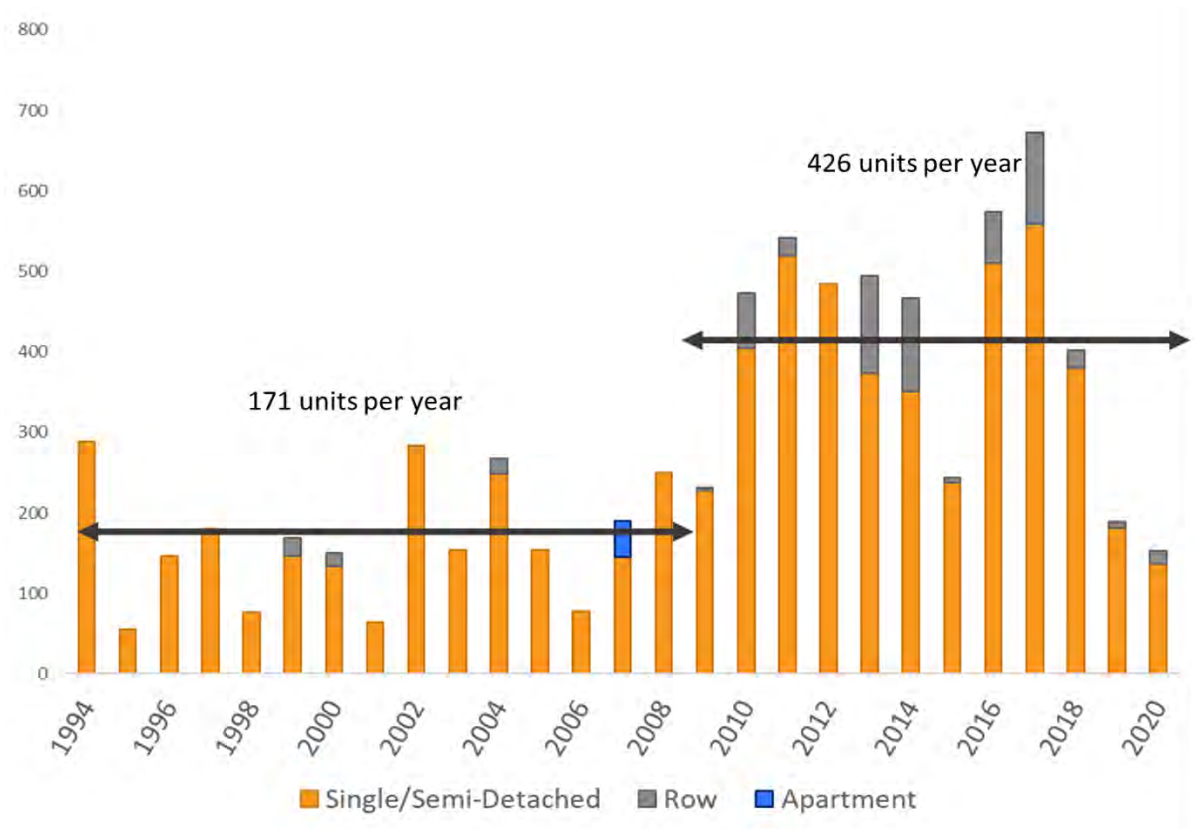
4.3 Housing Construction

Bradford West Gwillimbury has seen housing construction accelerate in recent years. As shown in Figure 4-8, housing completions averaged 171 units per year between 1994 and 2009. However, since 2010, housing construction has averaged 426 units per year, with a peak of 672 units in 2017. While housing completions slowed slightly in 2019 and 2020, with the latter potentially attributable to the influence of the pandemic on the broader economy and the permit and approvals process, annual averages remain above the 1994 to 2009 level.

Figure 4-8 also shows that housing construction by unit type has become slightly more diversified in recent years, with a shift towards row units. It is also notable that there has been very little apartment construction in Bradford-West Gwillimbury. Over the past 10-years, CMHC has identified

only 45 apartment unit completions. This does not include institutional unit types such as those in integrated care seniors communities, of which several have been developed in the Town in recent years.

Figure 4-8: CMHC Housing Completions, Bradford West Gwillimbury

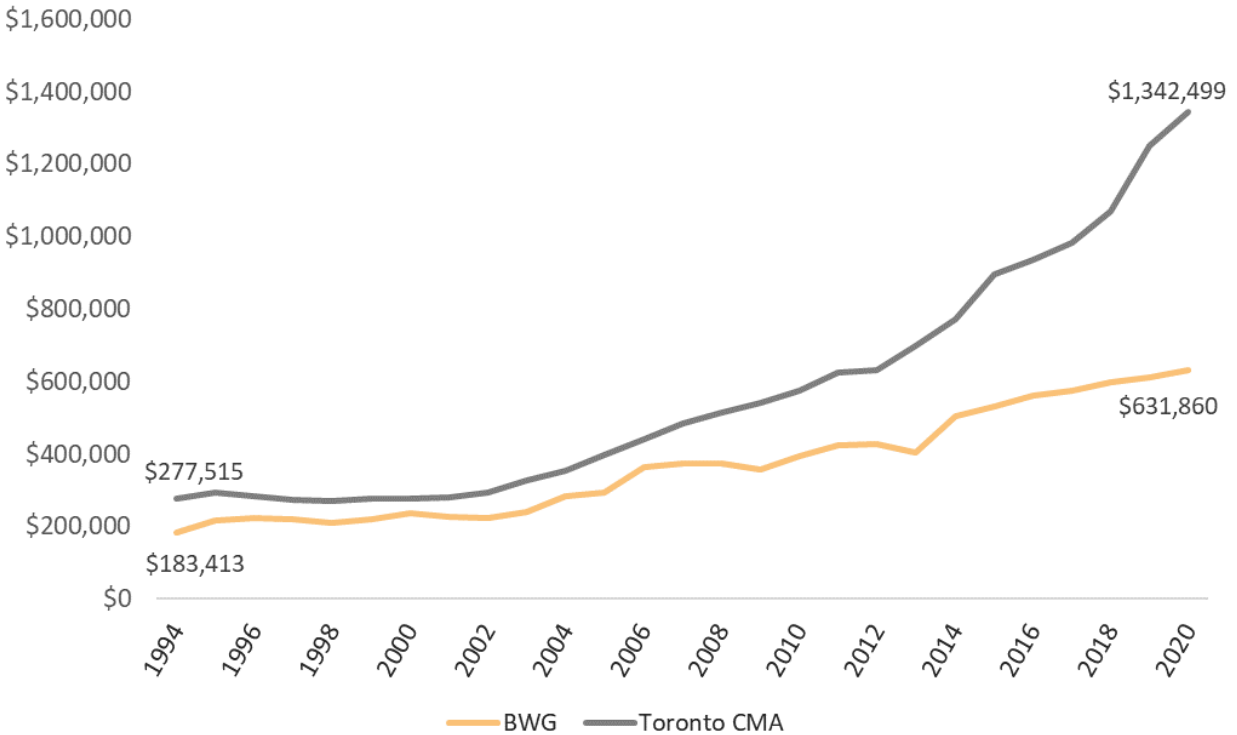


SOURCE: urbanMetrics inc., based on CMHC

4.4 New Home Prices

Increases in housing prices in Bradford West Gwillimbury have also accelerated in recent years, but not to the extent of the Toronto market, as approximated by the Toronto Census Metropolitan Area (CMA). As shown in Figure 4-9, average absorbed new single and semi-detached house prices in BWG grew at an average annual rate of 4.7% between 1994 and 2009, with this rate increasing to 5.6% annually between 2010 and 2020. Average annual prices of absorbed single and semi-detached units in the Toronto CMA increased by 4.7% over the period between 1994 and 2009, before accelerating to an average annual increase of 8.7% between 2010 and 2020.

Figure 4-9: CMHC Absorbed House Price, Single and Semi-Detached, BWG



SOURCE: urbanMetrics inc., based on CMHC

The Ministry of Municipal Affairs and Housing published affordable house price thresholds that meet the Provincial Policy Statement (the “PPS”) definition for affordable for each region of Ontario. For Simcoe County the identified affordable house price in 2019 was \$351,000 based on a household with income in the 60th percentile. In 2019 the 60th percentile price of a new home in BWG was \$635,000, nearly two times the affordability threshold. This is a significant difference, particularly when considering that single and semi-detached units accounted for more than 90% of unit completions in 2018 and 2019.

One way to influence the provision of more attainable housing is to ensure there is a sufficient and appropriate housing supply available to accommodate market demand. The impact of housing supply shortages on housing prices is identified in the LNA Methodology, where it states:

Given the complexity of completing the municipal comprehensive review, municipalities must designate all land required to the Plan horizon when using the Methodology through an official plan or official plan amendment. The objective is to provide sufficient land to accommodate all market segments so as to avoid shortages that would drive up land cost for both housing and employment uses... Schedule 3 of the Plan establishes the minimum population and employment growth forecasts that municipalities must use to assess land needs to the Plan

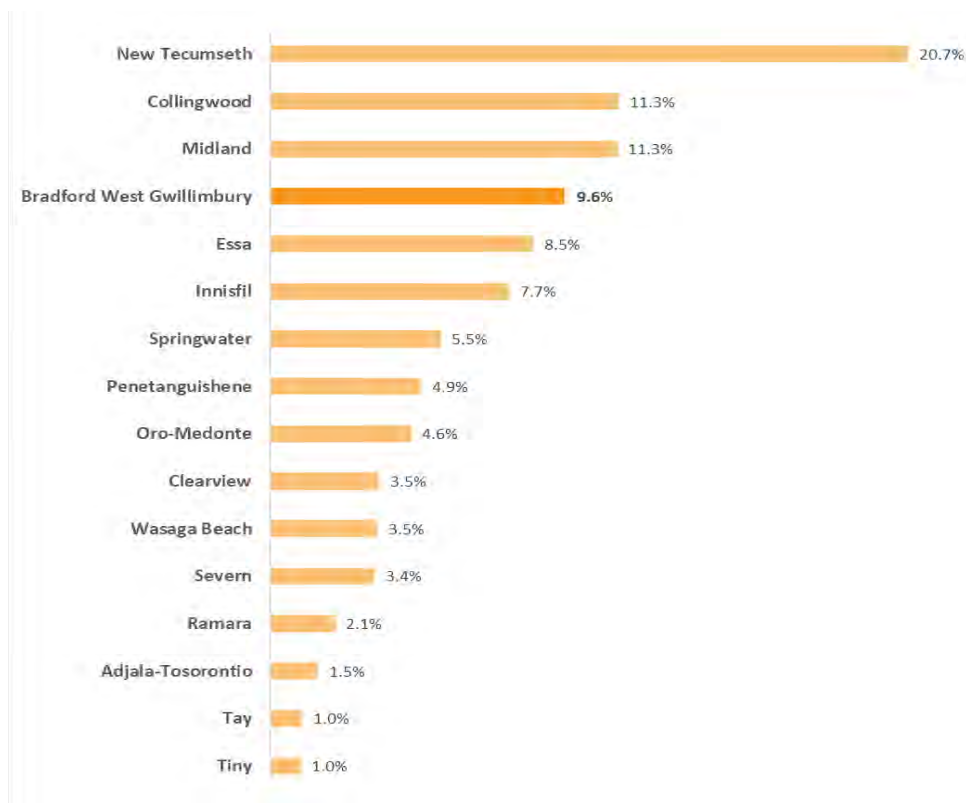
horizon. Lower forecasts are not permitted as this may lead to affordability issues and land shortages (Emphasis added).

These statements in the LNA Methodology illustrate the Province’s acknowledgement of the link between the supply of new housing that is available and increases in house prices. This highlights the importance of ensuring there is a sufficient supply of Community Area lands to avoid housing shortages and mitigate affordability issues.

4.5 Employment Profile & Commuting Trends

As shown in Figure 4-10, the Town of BWG was home to 9.6% of Simcoe County’s 2016 employment by place of work. It is anticipated that Bradford West Gwillimbury will continue to accommodate a significant amount of the County’s employment moving forward.

Figure 4-10: Share of Simcoe County Employment, Usual Place of Work, 2016



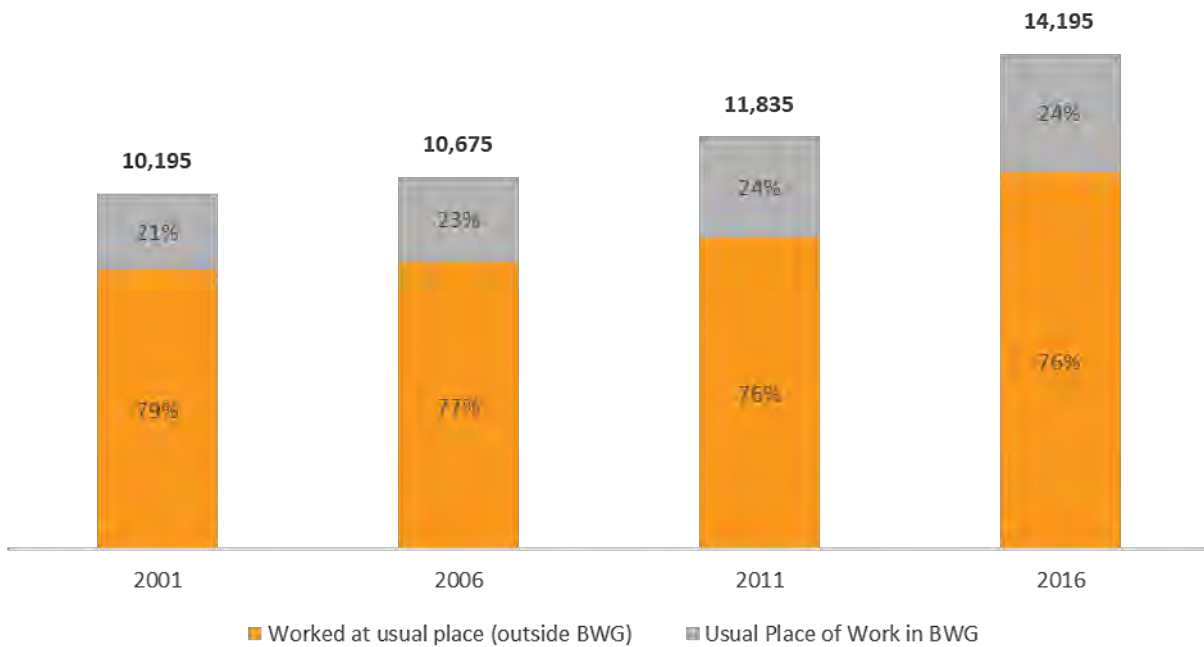
SOURCE: urbanMetrics inc. based on 2016 Census of Canada.

Employment forecasts prepared by Hemson in *Greater Golden Horseshoe: Growth Forecasts to 2051* anticipate that Employment Land Employment (ELE) growth is anticipated to account for nearly half of

all employment growth between 2016 and 2051 in Simcoe County. The building out of BWG’s Highway 400 Employment Area is likely to contribute to employment growth in the town and therefore influence demand for housing.

There is not necessarily a one-to-one connection between housing and employment, particularly within an economically connected region like the Greater Golden Horseshoe. As such, residents of many municipalities commute to another municipality for employment. In the case of Bradford West Gwillimbury, the majority of BWG residents work at a location outside the municipality, and the rate has increased in recent years, as shown in Figure 4-11 below.

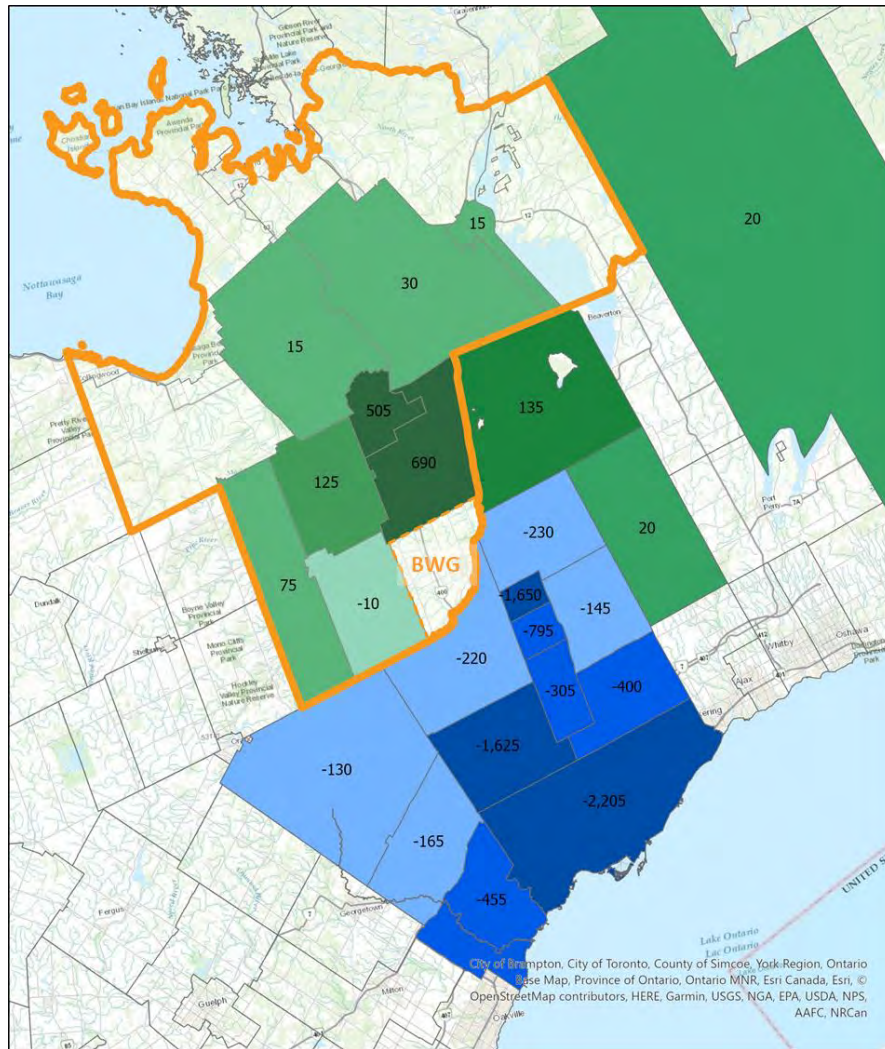
Figure 4-11: BWG Residents with a Usual Workplace Address by Location of Work



SOURCE: urbanMetrics inc., based on 2016 Census of Canada

As shown in Figure 4-12, commuting patterns through the Town of Bradford West Gwillimbury typically follow a north-south pattern. Of the 7,470 employed persons with a normal place of work in BWG 45% live within the Town itself, with 12% employees commuting south from Innisfil and 11% from Barrie. A significant proportion of employees in BWG also commute from elsewhere with larger proportions from Newmarket (6%), New Tecumseth (5%), and Toronto (4%).

Figure 4-12: Bradford West Gwillimbury 2016 Net Commuting Flows



SOURCE: urbanMetrics inc., from 2016 Statistics Canada Catalogue Number 98-400-X2016325

However, these commuting inflows are a smaller part of the larger trend of southward commuting. In 2016 Statistics Canada identified 14,195 BWG residents employed with a usual place of work. The same 3,380 residents/employees that comprise 45% of the Town’s usual place of work employment base represent 24% of total place of work employment by BWG residents. More than 45% of the Town’s employed residents commute south to the municipalities of York Region, with the largest concentrations in Newmarket, Vaughan, and Aurora. Approximately 17% of the Town’s employed residents commute to the City of Toronto. Some 4.2% of employed residents commute to elsewhere in Simcoe County, with an additional 2.2% commuting to the City of Barrie.

The significant commuting inflows of residents from municipalities in Simcoe County south to BWG, and the comparatively larger outflows of BWG residents south into York Region and the City of Toronto demonstrate the degree of economic linkages between not only the Town and its neighbouring municipalities of Simcoe County, but with the broader Greater Golden Horseshoe. As such, the projected increases in employment across York Region and the City of Toronto are likely to significantly impact demand for residential units in the Town over the planning horizon.

5.0 County Land Needs Assessment

Summary

Schedule 3 of the Growth Plan, August 2020 provides population and employment targets to 2051. Prior versions of the Growth Plan incorporated a “Schedule 7”, which provided targets for the individual municipalities within Simcoe. However, as with other Upper Tier Municipalities in the GTHA, Simcoe is required to re-allocate its population and employment targets to the individual lower tier municipalities. The County has been targeted with a 2051 population of 555,000 people and employment base of 198,000 jobs. As per the Growth Plan policies, these are considered minimum targets and can be increased by the County through a municipal comprehensive review (MCR).

Through the County’s ongoing MCR, Simcoe County arrived at population allocations for its lower tier municipalities, including Bradford West Gwillimbury. These were released as the Simcoe County Land Need Assessment on October 1, 2021. The Bradford-West Gwillimbury forecast utilizes a 2021 baseline of 44,420 residents and 11,970 jobs. Population of the Town is projected to increase to 85,610 persons, an increase of 41,190 people (+93%), representing an average annual increase of 2.2%. Employment in the town is projected to increase by 18,500 jobs to 30,470, a total increase of more than 150% and an average annual increase of 3.2%.

Figure 5-1: Simcoe County Land Needs Assessment - Bradford West Gwillimbury Land Needs

LAND NEEDS ASSESSMENT					
Community Area (Housing) Needs					
Policy Area	Single/Semi	Row	Apartment	Total	Community Area Assumptions
Delineated Built Up Area (BUA)					
Unit Allocation (%)	2.0%	19.0%	79.0%	100%	BUA Intensification Rate: 45%
Unit Allocation (#)	149	1,412	5,865	7,425	BUA Units Needed: 7,425
Supply Potential					
In Planning Process	58	347	280	685	DGA Persons and Jobs per ha: 55
On Vacant Land	0	0	0	0	Resulting DGA Land Need (ha): (245.0)
Accessory Units	283	0	0	283	
Total	341	347	280	968	Rural Share of Growth: 10%
Intensification Potential Required (Shortfall)	192	(1,065)	(5,585)	(6,457)	
Designated Greenfield Area (DGA)					
Unit Allocation (%)	86.6%	3.4%	10.0%	100%	Employment Area Needs
Unit Allocation (#)	6,430	252	743	7,425	
Supply Potential					
In Planning Process	420	146	122	688	Long-Term Land Supply (ha) 41.9
On Vacant Land	0	0	0	0	Provincial Strategic Employment Area (ha) 199.9
Total	420	146	122	688	Total Land Supply (ha) 241.8
Unit Excess (Shortfall)	(6,010)	(106)	(621)	(6,737)	
Rural Lands					
Unit Allocation (%)	68.3%	25.2%	6.5%	100%	Assumed Employment Land Density (jobs/ha) 20
Unit Allocation (#)	1,127	416	107	1,650	Employment Land Capacity (jobs) 4,836
Supply Potential					
In Planning Process	1,281	473	122	1,876	Employment Land Employment Growth, 2021 - 2051 (jobs) 7,141
On Vacant Land	0	0	0	0	Sufficiency of Supply (ha) (115.3)
Total	1,281	473	122	1,876	
Unit Excess (Shortfall)	154	57	15	226	
Market Housing Mix (According to Market Demand):	73%	13%	15%	100%	Surplus (Shortfall) of jobs (2,306)
Housing Mix in Planning Process:	38%	35%	27%	100%	
Policy Housing Mix (Required to Achieve Growth Plan):	47%	13%	41%	100%	

SOURCE: Hemson Consulting Ltd, Simcoe County Municipal Comprehensive Review

These population projections are then translated into housing unit projections based on the rates at which different age groups form households. The results of this analysis in the Town, as shown in Figure 5-1, identified the need for 16,500 dwelling units to accommodate this residential population growth. These units are then allocated to different policy areas. Firstly, 10% of unit growth, or 1,650 units, was allocated to rural lands, with the remaining 14,850 units split evenly between the Designated Greenfield Area and the Delineated Built-up Area.

This even split is due to the decision to pursue a 45% intensification rate. This intensification rate is an increase from previous County growth management work and represents a decision made by the County, as the Growth Plan allows for Simcoe County to determine its own intensification rate through the MCR process “based on maintaining or improving upon the minimum intensification target” contained in its Official Plan. In the case of Bradford-West Gwillimbury, the intensification rate was increased from a current level of 40%.

Different unit types require different amounts of land, and the total unit allocations are then broken down into three different unit categories; Single/Semi, Row, and Apartment. The LNA Methodology outlines that affordability, a mix of housing types, the potential for intensification and “ensuring the provision of a market-based supply of housing to the extent possible” are all important factors to consider when evaluating the potential unit mix and other policy decisions, such as the intensification rate. It goes further to acknowledge:

For the purposes of alternative intensification and designated greenfield area density targets, the ability to provide a market-based supply of housing is an important consideration in determining whether a target can be achieved.

The housing mix that results from the County’s assessment and analysis differs for the BUA and the DGA. The BUA is expected to develop as 2.0% Single/Semi detached units, 19.0% row units, and 79% apartment units. The DGA is envisioned to develop as 86.6% Single/Semi detached units, 25.2% row units, and 6.5% apartment units.

Following the allocation of units to policy areas the potential supply of units is then evaluated. In the Town’s BUA the County identified 685 units in the planning process, with no additional capacity to support units on currently vacant land. This resulted in a shortfall of 6,457 units within the built-up area. The DGA was found to have 688 units in the planning process with no additional potential to support units on currently vacant land. This resulted in a shortfall of 6,737 units in the greenfield area. No commentary or explanation was provided as to how the built-up area will accommodate the 6,457-unit shortfall in the absence of a supply of vacant lands.

As a result of the unit shortfall in the DGA, the land needs assessment finds that the Town has a need for an additional 245 hectares of greenfield lands, based on a greenfield density target of 55 persons and jobs per hectare. There is no explanation for how this density target was arrived at, or how many

jobs were added to the population to determine the need the additional 245 hectares of greenfield community land.

Market-Based Demand for Housing

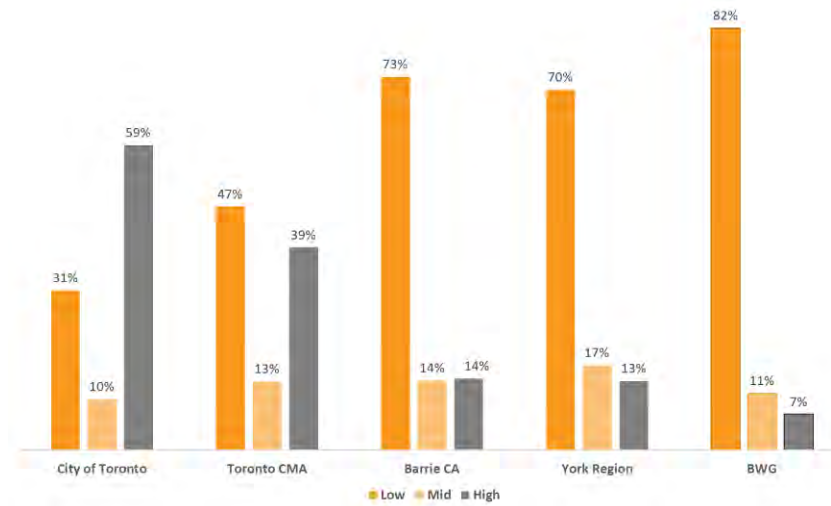
To effectively forecast future land and housing needs the LNA Methodology directs municipalities to plan for an appropriate range and mix of housing options to accommodate market-based demand for housing. References to “market-based” housing policy are also included in the PPS, with the Growth Plan referring to “market demand” for housing. The LNA Methodology is the most explicit:

“Conformity with the intensification and designated greenfield area density targets is confirmed or adjustments are made to ensure conformity with the Plan. This may require adjusting the mix of housing types while ensuring the provision of a market-based supply of housing to the extent possible. For the purposes of alternative intensification and designated greenfield area density targets, the ability to provide a market-based supply of housing is an important consideration in determining whether a target can be achieved.”

While we understand the need to adjust the housing mix away from what would typically be considered market demand to meet certain policy requirements, the 45% intensification target proposed in the County LNA results in significant deviation from the Growth Plan requirement for a broad mix of housing options and a consideration for market demand.

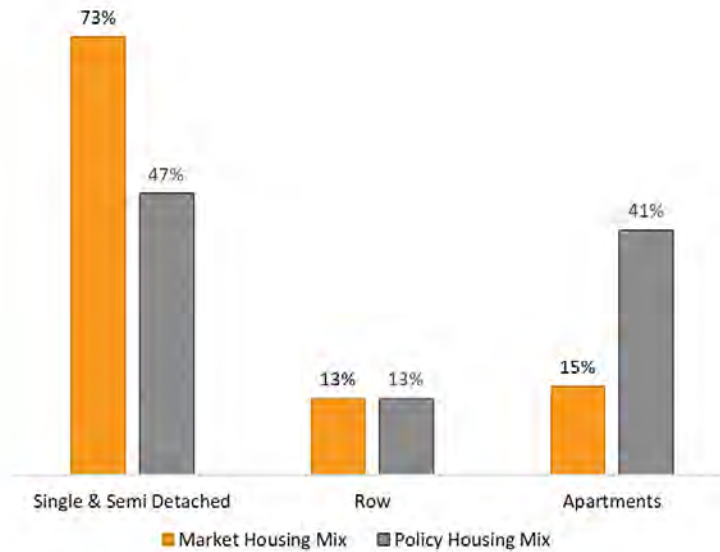
As outlined in the LNA Methodology, in order to forecast housing needs the population projections must consider household formation rates and propensities to occupy particular dwelling types. Historically, the residential market in Simcoe has demonstrated a strong preference for ground related housing types when compared to the relatively more urban municipalities closer to the Toronto downtown core. As shown in Figure 5-2, the City of Toronto accommodates residents through a very different housing mix than York Region, its neighbouring regional municipality. Dwelling type propensity in the City of Toronto indicates that nearly 60% of residents’ demands for housing are met through apartment units. In the Toronto CMA, which includes much of the central GGH, this proportion is 39%, with 47% of residents residing in low density unit types. In the Town of Bradford West Gwillimbury this proportion is only 7%, with 82% of residents living in low-density dwelling types.

Figure 5-2: Dwelling Type Preferences in Selected GGH Geographies



SOURCE: urbanMetrics inc., from Statistics Canada Census 2016

While the Growth Plan prioritizes intensification and the efficient utilization of existing lands and infrastructure, the “policy housing mix” proposed in the County LNA presents an approach to accommodating residents in the Town that does not appear to be feasible. As shown in Figure 5-3, the market housing mix represents a housing mix similar to the existing dwelling type propensities of York Region, itself an urbanizing and growing municipality. In contrast, the policy housing mix is more similar to the Toronto CMA, which represents the core of the GGH and includes the City of Toronto, one of Canada’s urban hubs and one of the fastest growing cities in North America.

Figure 5-3: BWG Market Based and Policy Based Housing Mix, 2051

SOURCE: urbanMetrics inc., based on the Simcoe County Land Needs Assessment prepared by Hemson Consulting Ltd.

The Shortfall of Land Within the Built-up Area

The County LNA allocates 7,425 new households, 45% of household growth, to the Built-Up Area (“BUA”) of Bradford West Gwillimbury. The allocation of these units is shown in both Figure 5-3 and Figure 5-4. The allocation of units is evaluated against the available supply of units or land to accommodate units, which includes those units under application as well as those that could be accommodated on vacant lands. It is notable that the County LNA has identified no remaining vacant lands to support unit growth within the currently delineated Built-up Area. As shown, this results in a shortfall of 6,458 units that would need to be accommodated through the intensification or wholesale redevelopment of existing sites within the BWG Built-up Area.

Based on an evaluation of recently completed and currently active developments across BWG and Simcoe County we have utilized unit densities of 50 units per net hectare for row units and 100 units per net hectare for apartment units to evaluate the impact of the unit shortfall from a land supply perspective. These densities are conservative insofar as there are many active or recently completed developments with less units per net hectare that would further increase the land required to support 6,458 units. As shown, the shortfall of 1,065 row units leads to a need to redevelop or intensify some 21 hectares of the existing Built-up Area, while the shortfall of 5,585 apartment units results in the redevelopment of some 56 hectares.

In total, to accommodate the 45% intensification rate utilized in the County’s LNA the Town will require the redevelopment of 77 net hectares of land within the BUA. These redevelopment sites will

need to be on lands designated as *Medium Density Residential, High Density Residential, or Downtown Bradford*.

Figure 5-4: BUA Land Needs - County LNA

Built Up Area	Single/Semi	Row	Apartment	Total
Unit Allocation %	2.0%	19.0%	79.0%	100%
Unit Allocation #	149	1,412	5,865	7,425
<u>Supply Potential</u>				
In Planning Process	58	347	280	685
On Vacant Land	0	0	0	0
Accessory Units	283	0	0	283
Total	341	347	280	968
Intensification Required (Shortfall)	192	-1,065	-5,585	-6,458
Density (units per net ha)		50	100	
Net ha Required		21 ha	56 ha	77 ha

SOURCE: urbanMetrics inc., based on the Simcoe County Land Needs Assessment prepared by Hemson Consulting Ltd. Numbers may not add due to rounding.

It does not appear that the County LNA has undertaken the analysis to determine if this rate of intensification is feasible. If this shortfall of units cannot be physically accommodated within the BUA it will result in housing shortages in the Town, further eroding housing affordability and resulting in an inability for BWG to meet the 2051 population target.

SOURCE: urbanMetrics inc., based on the Simcoe County Land Needs Assessment prepared by Hemson Consulting Ltd.

The intensification target for Bradford West Gwillimbury has been increased from 40% in the existing County Official Plan to 45% in the County LNA. The higher intensification rate exacerbates an already significant diversion from both the market-based demand for housing and the observed historical development patterns in the Town and the County. In addition, the higher intensification target contradicts the conclusions of the final update to the Simcoe County Residential Land Budget prepared by Hemson Consulting Ltd on March 23rd 2021. Hereafter referred to as the Hemson Memo, the addendum to the land budget update states:

“There is an insufficient supply in both the DGA and intensification areas. There is, however, excess supply in the rural areas of the municipality. A detailed review of the land supply in Bradford West Gwillimbury will be undertaken as part of the County’s MCR process”.

This commentary is accompanied by several tables that outline the 2031 population projections from the previous Growth Plan, the corresponding demand for housing, and the potential supply of housing units. At the time of this land budget update in March 2021 the County identified a potential unit

supply in the Bradford BUA of 1,527 units and a potential unit supply in the DGA of 1,035 units. This results in a total unit supply potential of 2,562 units.

The supply tables prepared as part of the County’s LNA indicate a potential BUA unit supply of 968 units, with a DGA supply of 688 units. This results in a total supply of 1,656 units, 906 units less than identified some 6 months earlier. These units are not accounted for in active development applications or completions tracked by CMHC. It is unclear what factors influencing this unit potential changed between the land budget exercise and the County LNA, and it is also unclear how this significant increase in the unit shortage within the Built-Up Area supports an increase in the intensification rate.

Intensification Feasibility

In addition to identifying opportunities to support intensification it is important to consider an economically feasible and community supported level of development. As illustrated in Figure 4-8, average unit completions in the Town over the past 20 years have fluctuated significantly between 112 and 672 units per year, with an overall increasing trend evident in recent years. To accommodate projected unit growth as outlined in the County LNA the Town would require the development of 550 units every year.

The feasibility of this scale of development is particularly concerning for higher density apartment units. CMHC has tracked the completion of 45 non-institutional apartment units over the last 20 years, with the Town now expected to build approximately 224 of such units per year over the next 30 years to meet demand. As identified in the LNA and shown in Figure 5-4, there are no vacant lands with the BUA capable of supporting these units, meaning that some 5,585 units, equating to approximately 56 hectares, will have to be constructed in Downtown Bradford through commercial redevelopments, intensification in proximity to Bradford GO station, or in the limited High Density residential lands identified in the Town’s proposed Official Plan update.

Community Area Land Needs in Southern Regional Market Area

The municipalities of Adjala-Tosorontio, Essa, New Tecumseth, Innisfil and Bradford West Gwillimbury, together comprise the Southern Regional Market Area Municipalities. The Land Needs Assessment identifies a combined DGA land need of 701.0 hectares based on the individual land needs summaries for the Southern Regional Market Area. However, the Public Open Houses on the Draft Land Needs Assessment identifies Community Area land needs deficit of 350 hectares for the Southern Regional Market Area. There is no explanation for the difference between the 701-hectare expansion identified in the land needs summaries and the 350-hectare expansion identified in the presentation on October 5th, 2021.

6.0 Evaluation & Conclusions

6.1 MCR Expansion Criteria

Section 2.2.8 of the Growth Plan, 2020 refers to *settlement area* Boundary Expansions. It identifies the scenario in which a *settlement area* boundary expansion may occur:

A settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that...based on the minimum intensification and density targets in this Plan and a land needs assessment undertaken in accordance with policy 2.2.1.5, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the designated greenfield area.

The identification of a significant unit shortfall in both the BUA and the DGA in the County's LNA demonstrates that, even when exceeding the minimum intensification targets in the Plan, there are not sufficient opportunities to accommodate forecasted growth through intensification and unit development in the existing designated greenfield area. As such, a boundary expansion will be required to accommodate residential growth to 2051.

2.2.8 3) then outlines the criteria by which the feasibility of a proposed expansion can be evaluated and how a municipality can identify the most appropriate location for the proposed expansion. It considers the availability of infrastructure and public service facilities, the ability to tie into existing wastewater or stormwater master plans, the avoidance of prime agricultural areas and a prohibition on development in Specialty Crop Areas, compliance with the minimum distance separation formulae, the meeting of requirements in environmental conservation and protection plans, and other policy factors.

We believe the subject site represents some of the most suitable lands in the vicinity of the Settlement Area to be considered for a potential boundary expansion. It is very well served by the existing transportation network and sits less than a kilometre from fully serviced residential neighbourhoods that are within the Built-up Area, simplifying the extension of servicing and mitigating the cost. In addition, 10 Sideroad to the south and east of the subject site is identified as a Major Arterial roadway in the Town's proposed Official Plan update, and adherence with good planning principles would extend the settlement area boundary westward past this significant component of the transportation network.

6.2 Conclusions

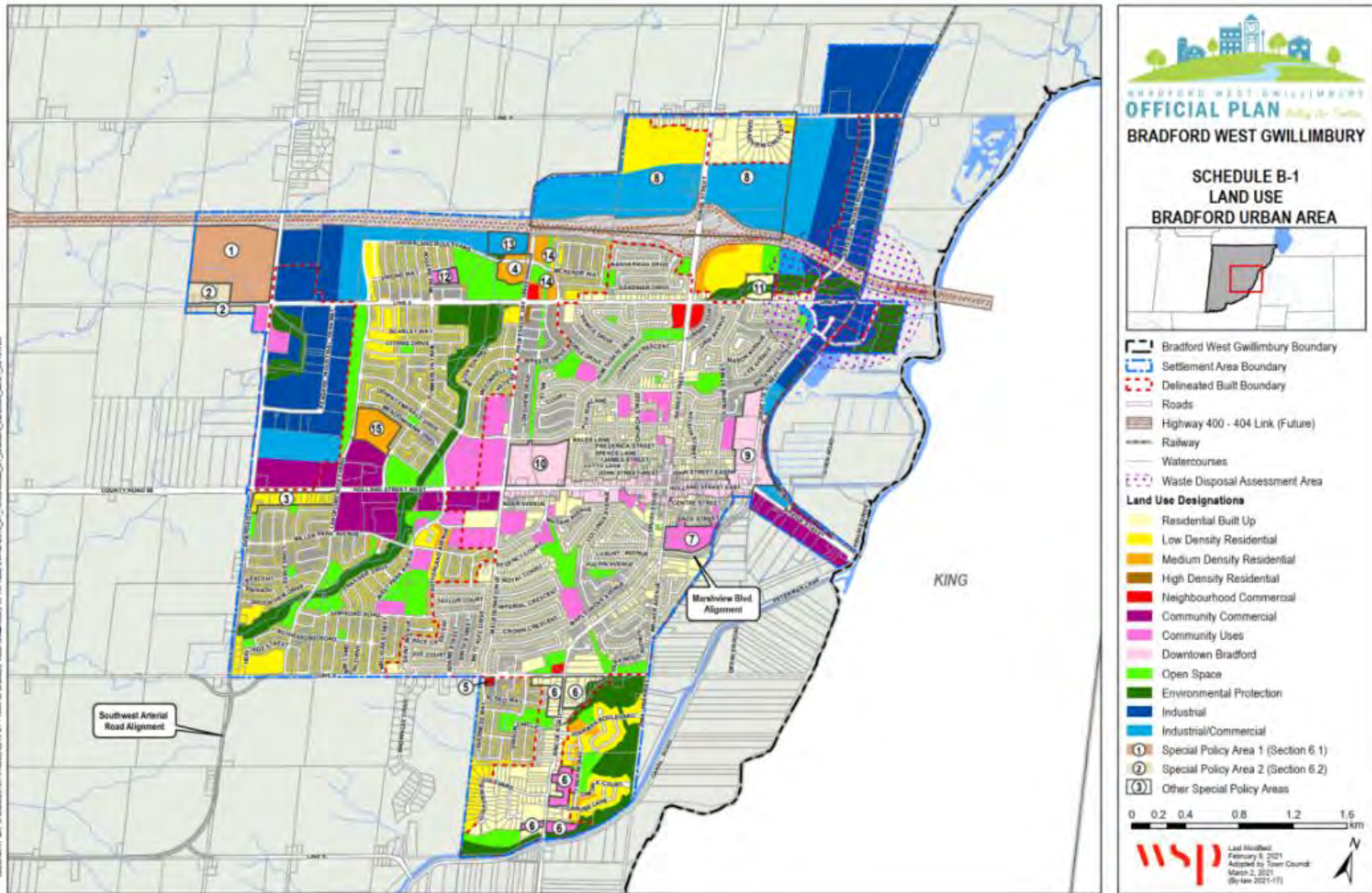
- Upon reviewing the identified background materials, the Town's proposed Official Plan update, and the County's Land Needs Assessment, it is our opinion that the Town of Bradford

West Gwillimbury will require a settlement area boundary expansion to accommodate projected growth to 2051.

- It is evident that the policy-based housing projections for the Town overly deviate from a market-based evaluation of demand for housing. The adjustment of several factors, including the intensification rate, are required to narrow the significant gap between the market and policy-based projections.
- It is not clear that the County’s land needs assessment has evaluated the feasibility of accommodating the identified 6,457-unit shortfall within the existing Built-up Area through intensification. This scale of redevelopment would require the completion of some 224 apartment units annually over the projection period, a scale of development exponentially larger than what has historically occurred in the Town and one that is likely unattainable.
- The County’s Land Needs Assessment implements a policy-based housing mix that diverges significantly from what could be considered market-based demand for housing unit types. Hemson Consulting Ltd. identified a market housing mix of 73% single and semi-detached units, 13% row units, and 15% apartment units, yet utilizes a housing mix that is only 47% single and semi-detached, maintains 13% row units, and increases apartment units from 15% to 41% of total units.
- In our opinion, the Land Needs Assessment makes the assumption that apartment units are a direct substitute for single and semi-detached units. This is not the case, particularly for families, which dominate the Bradford-West Gwillimbury housing market. For this reason, the forced shift from single and semi-detached units is contrary to market demand and is unsustainable in this community.
- The County LNA was not able to identify any vacant lands within the Built-up Area capable of supporting this redevelopment. This means that the Town will be obliged to redevelop approximately 77 hectares of its Built-up Area when evaluating the land supply impact of these units using average development densities.
- It is our opinion that a lower intensification rate will be required for the Town due to the lack of intensification opportunities within the built-boundary. As a result, this would require even more land to be added outside of the settlement area boundary to accommodate, at minimum, additional mid-density units in lieu of the level of intensification prescribed by the Land Needs Assessment.
- It is our opinion that an expansion of the Settlement Area Boundary to the south and east meets the expansion criteria outlined in the LNA Methodology and can provide needed land to accommodate a wide range of housing types while leveraging existing and planned arterial

roadways, proximity to waste and storm water infrastructure, and an avoidance of specialty crop areas.

Appendix A Land Use Maps



Appendix B Simcoe County LNA



Bradford West Gwillimbury



FORECAST RESULTS

Year	Population			Share of Growth	Housing By Type				
	Total	Growth	Annual Rate		Single/Semi	Rows	Apartments	Total	Growth
2011	28,870				7,700	310	1,460	9,470	
2016	36,560	7,690	4.8%	25.6%	9,420	570	1,600	11,590	2,120
2021	44,420	7,860	4.0%	18.3%	11,170	870	1,780	13,820	2,230
2026	51,330	6,910	2.9%	23.0%	13,270	1,230	2,300	16,800	2,980
2031	58,030	6,700	2.5%	22.7%	15,350	1,560	2,800	19,730	2,930
2036	65,250	7,220	2.4%	21.1%	17,500	1,950	3,240	22,690	2,960
2041	72,290	7,040	2.1%	21.5%	19,710	2,330	3,610	25,650	2,960
2046	79,350	7,060	1.9%	18.7%	21,460	2,640	3,940	28,040	2,390
2051	85,610	6,260	1.5%	18.9%	23,170	2,950	4,200	30,320	2,280
2021-51 Growth		41,190	2.2%	17.2%	12,000	2,080	2,420	16,500	

Year	Employment			Share of Growth	Employment By Type				
	Total	Growth	Annual Rate		Major Office	Pop-Related	Emp. Land	Rural	Total
2016	10,680				0	8,390	700	1,600	10,690
2021	11,970	1,290	2.3%	20.0%	0	9,630	730	1,610	11,970
2026	14,590	2,620	4.0%	20.5%	0	11,420	1,540	1,630	14,590
2031	17,000	2,410	3.1%	20.8%	0	13,100	2,250	1,650	17,000
2036	20,040	3,040	3.3%	22.9%	310	14,580	3,480	1,670	20,040
2041	23,170	3,130	2.9%	23.8%	740	16,010	4,720	1,690	23,160
2046	27,060	3,890	3.2%	23.8%	1,100	17,750	6,510	1,700	27,060
2051	30,470	3,410	2.4%	23.9%	1,550	19,350	7,870	1,710	30,480
2021-51 Growth		18,500	3.2%	22.7%	1,550	9,720	7,140	100	18,510

LAND NEEDS ASSESSMENT

Community Area (Housing) Needs

Policy Area	Single/Semi	Row	Apartment	Total	Community Area Assumptions	
Delimited Built Up Area (BUA)						
Unit Allocation (%)	2.0%	19.0%	79.0%	100%	BUA Intensification Rate: 45%	
Unit Allocation (#)	149	1,412	5,865	7,425	BUA Units Needed: 7,425	
Supply Potential						
In Planning Process	58	347	280	685	DGA Persons and Jobs per ha: 55	
On Vacant Land	0	0	0	0	Resulting DGA Land Need (ha): (245.0)	
Accessory Units	283	0	0	283	Rural Share of Growth: 10%	
Total	341	347	280	968		
Intensification Potential Required (Shortfall)	192	(1,065)	(5,585)	(6,457)		
Designated Greenfield Area (DGA)						
Unit Allocation (%)	86.6%	3.4%	10.0%	100%	Employment Area Needs	
Unit Allocation (#)	5,430	252	743	7,425		Long-Term Land Supply (ha) 41.9
Supply Potential						Provincial Strategic Employment Area (ha) 199.9
In Planning Process	420	146	122	688		Total Land Supply (ha) 241.8
On Vacant Land	0	0	0	0	Assumed Employment Land Density (jobs/ha) 20	
Total	420	146	122	688	Employment Land Capacity (jobs) 4,836	
Unit Excess (Shortfall)	(6,010)	(130)	(623)	(6,763)	Employment Land Employment Growth, 2021 - 2051 (jobs) 7,141	
Rural Lands					Sufficiency of Supply (ha) (115.3)	
Unit Allocation (%)	68.5%	25.2%	6.5%	100%	Surplus (Shortfall) of jobs (2,306)	
Unit Allocation (#)	1,127	416	107	1,650		
Supply Potential						
In Planning Process	1,281	473	122	1,876		
On Vacant Land	0	0	0	0		
Total	1,281	473	122	1,876		
Unit Excess (Shortfall)	154	57	15	226		
Market Housing Mix (According to Market Demand):						
	73%	13%	15%	100%		
Housing Mix in Planning Process:						
	38%	35%	27%	100%		
Policy Housing Mix (Required to Achieve Growth Plan):						
	47%	13%	41%	100%		



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SENT VIA EMAIL

File: P-3312

December 8, 2021

The County of Simcoe
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, Ontario
L9N 1X6

**Attention: Mr. Dan Amadio, Manager of Planning
Mr. Greg Marek, Manager of Planning**

**RE: County of Simcoe Municipal Comprehensive Review
GB (Bradford 3) Inc.
2572 Sideroad 10
Town of Bradford West Gwillimbury**

Dear Mr. Amadio and Mr. Marek,

KLM Planning Partners Inc. is the land use planning consultant for GB (Bradford 3) Inc. (the “client”), the owners of 2572 Sideroad 10 in the Town of Bradford West Gwillimbury (“Town”), County of Simcoe (“County”). The lands have an area of 14.164 hectares (35.00 acres) and are generally located on the west side of Sideroad 10, north of Line 6 and south of County Road 88 in the Town of Bradford West Gwillimbury (“Subject Lands”). A context map identifying the location of the Subject Lands is included herein as Attachment No. 1.

The Subject Lands are currently designated “Agricultural” on Schedule ‘A’ to the Town Official Plan, 2002 (“Town OP”) and “Agricultural” on Schedule 5.1 to the County Official Plan, 2016 (“County OP”). The Subject Lands are also proposed to be designated ‘Agricultural’ on Schedule ‘B’ to the Town’s New Official Plan Adopted by the Town on March 2, 2021 (“New Town OP”).

The Growth Plan provides population and employment growth forecasts to the County to 2051. The effect of these new forecasts is that the County is directed to plan for a population of 555,000 and 198,000 jobs by 2051; growth of 139,000 people and 66,000 jobs from the 2031 forecast used as the basis for the County OP and the New Town OP.

In accordance with the policies of the County OP, expansions to Settlement Area Boundaries can only be undertaken through a MCR (save and except for 40-hectare expansions as permitted by the Growth Plan). As part of the MCR, the County will be conducting a review of the population and employment forecasts to 2051, including the distribution of such to each of the County's local municipalities, including the Town.

On October 1, 2021, the County issued a draft Land Needs Assessment ("LNA") in accordance with the Provincial methodology, required in support of the County Municipal Comprehensive Review ("MCR"). The LNA results specific to the Town identify a 2051 population and employment forecast of 41,190 people and 18,500 jobs respectively. These forecasts result in a requirement for an additional 245.0 hectares of Community Area Land and 115.3 hectares of Employment Area Land.

It is acknowledged that the Settlement Area of Bradford within the Town is identified in both the Growth Plan and the County OP as a Primary Settlement Area. Pursuant to the Growth Plan, Municipalities with primary settlement areas will, in their official plans and other supporting documents:

- a) identify primary settlement areas;
- b) identify and plan for strategic growth areas within primary settlement areas;
- c) plan to support the achievement of complete communities within primary settlement areas; and,
- d) 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 and vibrant places that support walking and cycling for everyday activities and are transit-supportive.

Section 6.3.4 of the Growth Plan further states that the Town will direct a significant portion of population and employment growth forecasted to the applicable primary settlement areas.

In order for the Town to achieve the objectives of the Growth Plan as it relates to primary settlement areas noted herein, a significant amount of the County's overall growth to 2051 should be directed to the Town. As such, we are respectfully requesting that the County allocate a sufficient quantum of growth to the Town to permit the expansion of the Bradford Settlement Area Boundary to include our clients' lands as Community Area Land.

On behalf of our client, while conducting the ongoing MCR, we ask that the MCR Project Team consider the Subject Lands for future expansions to the Settlement Area of Bradford to support the ongoing and desirable growth of the County. As you may recall, we have previously filed similar requests on behalf of our clients for 2955 5th Line and 3174 5th Line. This request is in addition to those. We would appreciate the opportunity to participate in discussions related to the MCR and may wish to make further detailed submissions in relation to subsequent reports related to this process.

Further, we respectfully request notice of any future reports and/or public meetings and consultations regarding the MCR, and further that we receive notice of any decision of County Council.

Yours very truly,

KLM PLANNING PARTNERS INC.



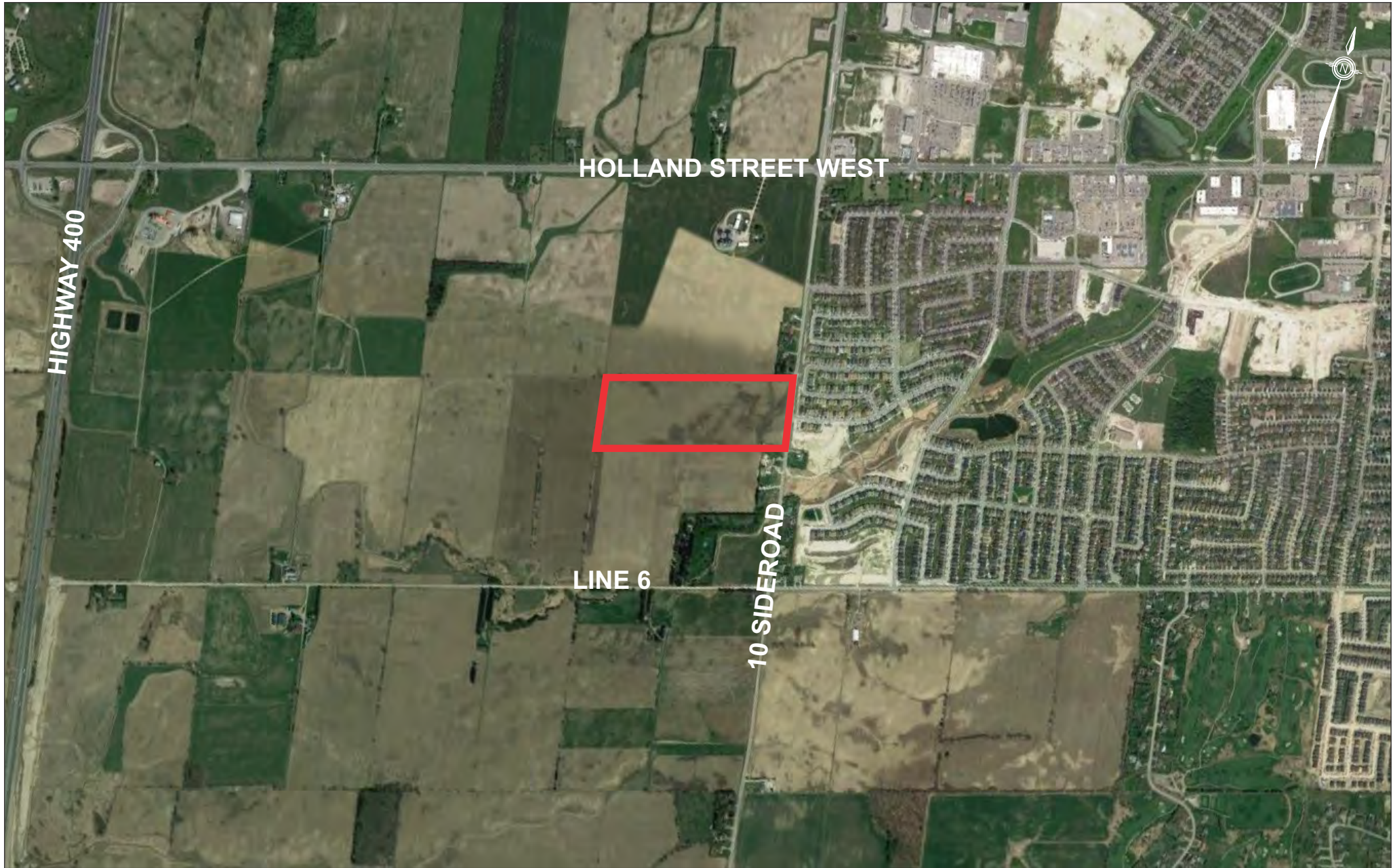
Keith MacKinnon, MCIP, RPP
Partner



Tim Schilling, MCIP, RPP
Senior Planner

cc: David Parks, Director of Planning, Economic Development, Transit and Airport Services, County
Alan Wiebe, Manager of Community Planning, Town of Bradford West Gwillimbury
GB (Bradford 3) Inc.

LOCATION MAP



Subject Lands

2572 10th Sideroad, Bradford West Gwillimbury
County of Simcoe

December 8, 2021



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SENT VIA EMAIL

Files: P-2687
P-3266
P-3312

July 14, 2022

Town of Bradford West Gwillimbury
3541 Line 11
P.O. Box 160
Bradford, Ontario
L3Z 2A8

Attention: Alan Wiebe MCIP, RPP
Manager, Office of Community Planning

RE: Growth Forecasts and Land Needs Assessment
Potential Expansion to the Bradford Settlement Area Boundary
GB (Bradford) Inc., GB (Bradford 2) Inc. and GB (Bradford 3) Inc.
2944 5th Line, 3174 5th Line and 2572 Sideroad 10
Town of Bradford West Gwillimbury

Dear Mr. Wiebe,

KLM Planning Partners Inc. is the land use planning consultant for GB (Bradford) Inc., GB (Bradford 2) Inc. and GB (Bradford 3) Inc. (the “**client**”), the owners of 2944 5th Line, 3174 5th Line and 2572 Sideroad 10 respectively in the Town of Bradford West Gwillimbury (the “**Town**”). The three parcels of land (the “**Subject Lands**”) are generally described as follows:

1. 2944 5th Line - The lands are approximately 40 hectares (100 acres) in size and are bounded by 5th Line in the south, Bradford Highlands Golf Club in the east, a mid-concession lot line between Lots 11 and 12, Concession 5 in the west and a mid-concession lot line between Concessions 5 and 6 in the north.
2. 3174 5th Line - The lands are approximately 34.21 hectares (84.53 acres) in size and are bounded by 5th Line in the south, 10th sideroad in the east, a mid-concession lot line between Lots 9 and 10, Concession 5 in the west and a mid-concession lot line between Concessions 5 and 6 in the north.

3. 2572 Sideroad 10 - The lands have an area of 14.164 hectares (35.00 acres) and are generally located on the west side of Sideroad 10, north of Line 6 and south of County Road 88/Holland Street.

We have previously provided comments to the County of Simcoe ("**County**") with respect to the County's Municipal Comprehensive Review ("**MCR**") and Land Needs Assessment ("**LNA**"), requesting the consideration of our client's lands for a future expansion to the Bradford Settlement Area Boundary. The Town has been copied on this correspondence; however, a copy of each letter is attached herein for ease of reference. It is also noted that while the County will allocate growth forecasts to each lower-tier municipality to the year 2051, local municipalities are required to evaluate the most appropriate location for growth to occur through settlement area boundary expansions as discussed below.

At the April 12, 2022 County Council meeting, County Council received a presentation and revised LNA. It is noted that these results were updated in a memo dated May 31, 2022, to account for refinements to land supply information in specific locations and a reallocation of employment growth to the Bradford West Gwillimbury Strategic Settlement Employment Area. The revised LNA identifies that the Town is forecast to grow to a population of 83,470 by 2051 (an increase of 38,980 people from 2021). The LNA identifies that this growth requires an additional Community Area land need of 449.1 hectares (1,109.7 acres). While the Town's employment forecast is also set to grow to 2051, no additional Employment Area land is required in the Town.

The County MCR Process

The County MCR has been divided into two phases. Phase 1 will assess the population and employment forecasts, intensification and greenfield area density targets and land needs for both Community Area and Employment Area Land for all local municipalities. No delineation of expanded settlement area boundaries in the County Official Plan will occur in Phase 1. Phase 2 will involve the County working with local municipalities to update their Official Plans to conform to the additional Community Area and Employment Area Land requirements established through Phase 1, through requisite settlement area boundary expansion(s). These decisions will be based on guidance provided in relevant Provincial policy documents, requirements as identified through Phase 1 as well as local municipal criteria and unique context. An update to the County Official Plan ("**County OP**") would follow to reflect the modified settlement area boundaries in local official plans.

A draft County Official Plan Amendment ("**COPA**") to implement Phase 1 of the MCR has recently been released.

Proposed Settlement Area Expansion

The Settlement Area of Bradford is identified in A Place to Grow: Growth Plan for the Greater Golden Horseshoe ("**Growth Plan**"), the County OP and the Town's Adopted Official Plan ("**Adopted OP**") as a Primary Settlement Area. The Growth Plan establishes that municipalities with

Primary Settlement areas are required to direct a substantial portion of the Community Area Land need the Primary Settlement Area. As a result, the Town is required to direct a substantial amount of allocated growth to Bradford. To assist the Town in demonstrating conformity to this requirement, we have identified a conceptual settlement area boundary expansion (“**Proposed Expansion**”) as depicted in Attachment No. 1 to this letter. Our client’s three parcels are located within the Proposed Expansion, however we advise that we do not represent all potentially affected landowners nor have we discussed the contents of this letter with them.

The Proposed Expansion has an area of approximately 400 hectares (988 acres) and would provide for a logical expansion to the Bradford Settlement Area Boundary. The Proposed Expansion is served by existing transportation corridors, including 10 Sideroad, 5th Line, Line 6, County Road 88/Holland St. W. and 8th Line, are in close proximity to Highway 400 and provides a series of opportunities for integration with developed areas within the existing Bradford Settlement Area Boundary.

The Proposed Expansion would enable the Town to comprehensively plan for a multitude of regional community infrastructure and public service facilities to support the ongoing development of Bradford as a complete community. Community infrastructure and public service facilities can be difficult to implement when not considered on large contiguous parcels of land, where the Town is able to leverage the broad interests of a number of landowners and stakeholders including the County, Province of Ontario, school boards, conservation authorities, etc. These can include but are not limited to:

- regional parkland and open space linkages;
- community centres, emergency services and other institutional uses;
- elementary and secondary school sites;
- integrated transportation, transit and trail corridors;
- stormwater management facilities and water and wastewater infrastructure e.g. pumping stations, etc.; and,
- location of population related employment centres and mixed-use areas.

Planning for a large-scale expansion as identified in the Proposed Expansion also allows the Town to address the following:

- the provision of public transit, pedestrian and cycling networks;
- the provision of public and private services and the detailed approach to stormwater management;
- protection and enhancement of the Natural Heritage system, including the detailed evaluation and demarcation of features and buffers;
- the locations of natural and cultural heritage features of the area, including built heritage and potential archaeological resources and proposed approaches to conservation and or enhancement;
- the proposed implementation of sustainable development policies; and,
- development phasing to align growth with the provision of infrastructure.

The Proposed Expansion would equate to approximately 90% of the Town's required settlement area expansion as identified by the County through Phase 1 of their MCR. The remaining 10% or approximately 50 hectares can be allocated in other areas of the Town as determined appropriate by Town Council.

Evaluation of the Proposed Expansion

The Adopted OP identifies that a settlement area expansion shall only be considered as part of a municipal comprehensive review, undertaken by the County. It is further noted that Section 3.7.3 from the Adopted OP identifies the following:

“Planning for new or expanded infrastructure will occur in an integrated manner, including evaluations of long-range scenario-based land use planning and financial planning, and will be supported by infrastructure master plans, asset management plans, community energy plans, watershed planning, environmental assessments and other relevant studies where appropriate, as part of the County municipal comprehensive review.”

While there are no criteria in the Adopted OP with respect to evaluating potential settlement area expansion options, Section 2.2.8.2 and 2.2.8.3 of the Growth Plan and Section 3.2.26 to 3.2.28 of the COPA, provide a series of criteria to be considered in this regard in evaluating the feasibility of a proposed expansion.

These are identified and discussed in the table below. RAND Engineering Corporation have also prepared a Municipal Servicing Assessment memorandum in connection with this letter which evaluates municipal water, waste water and stormwater systems (the “**RAND Memo**”). The RAND Memo is provided as Attachment No. 2 for your reference.

Criterion/Responses	Policies from the Growth Plan	Policies from the County's Draft OPA	KLM Response on behalf of GB (Bradford) Inc., GB (Bradford 2) Inc. and GB (Bradford 3) Inc.
Demonstration of need for the expansion	<p>2.2.8.2: A settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that:</p> <ul style="list-style-type: none"> a) based on the minimum intensification and density targets in this Plan and a land needs assessment undertaken in accordance with policy 2.2.1.5, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the designated greenfield area: <ul style="list-style-type: none"> i. within the upper-or single-tier municipality, and ii. within the applicable lower-tier municipality; b) the proposed expansion will make available sufficient lands not exceeding the horizon of this Plan, based on the analysis provided for in policy 2.2.8.2 a), while minimizing land consumption; and, c) the timing of the proposed expansion and the phasing of development within the designated greenfield area will not adversely affect the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan. 	<p>3.2.26 For those municipalities that are required to plan for additional designated greenfield area in accordance with this section, a comprehensive planning process shall be undertaken by the local municipality to identify the most appropriate location(s) for additional growth and development that best:</p> <ul style="list-style-type: none"> i. Protects <i>natural heritage features and areas</i>; ii. Promotes coordinated, efficient and cost effective infrastructure; iii. Promotes fiscal responsibility; and iv. Ensures the development of compact, complete and healthy communities. 	<ul style="list-style-type: none"> ▪ As noted, the County are currently undertaking an MCR. Through the MCR and the requisite County Official Plan Amendments, the County will distribute the 2051 population and employment forecasts from the Growth Plan to each local municipality, including the Town. ▪ The LNA completed by the County in accordance with the Provincial methodology has identified that the Town is forecast to grow to a population of 83,470 by 2051. To accommodate this growth, the LNA identifies that an additional 7,122 dwelling units are required within the Town, which translates into a need for an additional 449.1 hectares (1,109.72 acres) of Community Area land. ▪ It is anticipated that upon approval of the County MCR and the draft COPA, the Town will undertake a comprehensive process to evaluate all possible settlement area boundary expansion opportunities to accommodate growth to 2051. As noted above, the Proposed Expansion allows the Town to plan for additional designated greenfield area (“DGA”) land comprehensively and achieve the objectives of the County to best protect natural heritage features and areas, plan for coordinated, efficient and cost-effective infrastructure, promote fiscal responsibility and ensure the development of compact, compete and healthy communities.
Determining most appropriate locations for expansion based on Feasibility	<p>2.2.8.3: Where the need for a settlement area boundary expansion has been justified in accordance with policy 2.2.8.2, the feasibility of the proposed expansion will be determined and the most appropriate location for the proposed expansion will be identified based on the comprehensive application of all of the policies in this Plan, including the following:</p>	<p>3.2.27 In addition to the above, the local municipality will be required to demonstrate in support of the recommended location(s) for additional urban development that:</p>	<ul style="list-style-type: none"> ▪ Per the below.
Feasibility – infrastructure and public service facilities	<ul style="list-style-type: none"> a) there is sufficient capacity in existing or planned infrastructure and public service facilities; 	<ul style="list-style-type: none"> i. There is sufficient capacity in existing or planned infrastructure and public service facilities; 	<ul style="list-style-type: none"> ▪ An integrated approach to the provision of infrastructure with growth is a foundational principle of the Growth Plan. Infrastructure and public service facilities across the Town will need to be expanded to accommodate the 2051 population and employment growth forecasts, whether through intensification or urban boundary expansions in a comprehensive fashion as identified by Section 3.7.3 of the Adopted OP and identified above. Opportunities to maximize existing infrastructure will also be explored.

			<ul style="list-style-type: none"> The RAND Memo identifies that expansions to each system will be required to accommodate the Proposed Expansion.
Feasibility – infrastructure and public service facilities	b) the infrastructure and public service facilities needed would be financially viable over the full life cycle of these assets;	ii. The infrastructure and public service facilities needed would be financially viable over the full life cycle of these assets;	<ul style="list-style-type: none"> The financial requirements of expanded infrastructure will need to be carefully assessed through comprehensive servicing investigations. It is anticipated that once built, all new infrastructure would be monitored through the Town’s asset management program in a coordinated approach, that ensures financial sustainability in accordance with principles established by the Province of Ontario.
Feasibility – water, wastewater, and stormwater	c) the proposed expansion would be informed by applicable water and wastewater master plans or equivalent and stormwater master plans or equivalent, as appropriate;	iii. The proposed expansion would be informed by applicable water and wastewater master plans or equivalent and stormwater master plans or equivalent, as appropriate;	<ul style="list-style-type: none"> The RAND Memo identifies that the expansion of the municipal infrastructure to accommodate the Proposed Expansion will require comprehensive wastewater, water and stormwater management assessment through a comprehensive secondary planning process.
Feasibility – watershed conditions, water resource system	d) the proposed expansion, including the associated water, wastewater and stormwater servicing, would be planned and demonstrated to avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the water resource system, including the quality and quantity of water;	iv. The proposed expansion, including the associated water, wastewater and stormwater servicing, would be planned and demonstrated to avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the water resource system, including the quality and quantity of water;	<ul style="list-style-type: none"> The draft COPA calls for local municipalities to prepare sub-watershed plans or their equivalent when planning for the development of additional DGA, to ensure that all elements of the natural heritage and water resource systems are considered along with climate change impacts and severe weather events. It is again anticipated that this would be completed as part of a comprehensive secondary planning process.
Feasibility – key hydrologic areas and Natural Heritage System for the Growth Plan, other environmental areas/features	e) key hydrologic areas and the Natural Heritage System for the Growth Plan should be avoided where possible;	v. Key hydrologic areas and the Natural Heritage System for the Growth Plan have been avoided where possible;	<ul style="list-style-type: none"> A series of watercourses and an unevaluated wetland are identified on Schedule ‘D-2’ of the Adopted OP. Flood prone areas associated with some of these features are also identified on Schedule ‘D-4’ of the Adopted OP. These features/areas and their associated buffer areas would be assessed and delineated during the secondary planning process as required by the Adopted OP, and any preservation/mitigation measures would be identified and implemented through future Planning Act applications. Pursuant to mapping available through the County MCR, the Subject Lands are not located within the Natural Heritage System for the Growth Plan.
Feasibility – Prime Agricultural Areas	f) prime agricultural areas should be avoided where possible. To support the Agricultural System, alternative locations across the upper-or single-tier municipality will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the Agricultural System and in accordance with the following: i. expansion into specialty crop areas is prohibited;	vi. Prime agricultural areas have been avoided where possible;	<ul style="list-style-type: none"> The Subject Lands are not a specialty crop area. With the exception of the Bradford Highlands Golf Course and a small parcel of land south of Line 5, all other lands abutting the existing Bradford Settlement Area Boundary to the west and north and outside of the specialty crop area associated with the Holland Marsh to the east of Bradford, are designated Agricultural. As

	<ul style="list-style-type: none"> ii. reasonable alternatives that avoid prime agricultural areas are evaluated; and, iii. where prime agricultural areas cannot be avoided, lower priority agricultural lands are used; 		<p>such, there are no reasonable alternatives to expand the Bradford Settlement Area Boundary that avoid prime agricultural areas.</p> <ul style="list-style-type: none"> iii. When avoidance is not possible, the next priority is to minimize/mitigate impacts to the extent feasible. The mitigation of impacts can be achieved during the detailed design process and through proactive planning measures that provide for the separation of land uses which would occur through the secondary planning process and would be required prior to any development occurring on the Subject Lands. Notwithstanding the above, pursuant to comments below, there are no existing livestock facilities within a distance of 1,500 metres of the Subject Lands which would be impacted by the development of same. As such it is anticipated that any potential impacts on adjacent agricultural uses can be mitigated through the Secondary Planning process.
Feasibility – Impacts on Agricultural uses	g) the settlement area to be expanded is in compliance with the minimum distance separation formulae;	vii. The settlement area to be expanded is in compliance with the minimum distance separation formulae;	<ul style="list-style-type: none"> ▪ For the purposes of a settlement area boundary expansion, completion of minimum distance separation (“MDS”) I setbacks are required at the time of an official plan amendment application to change the land use from a prime agricultural area or rural lands type designation to a settlement area type designation. New or expanded settlement area boundaries are considered a Type B land use. All existing livestock facilities or anaerobic digesters within a 1,500-metre distance of a proposed Type B land use shall be investigated and MDS I setback calculations undertaken where warranted. ▪ Implementation Guideline No. 6 from the Ontario Ministry of Agriculture, Food and Rural Affairs MDS Implementation Guidelines identifies that separate MDS I setbacks shall be required to be measured from all existing livestock facilities and anaerobic digesters on lots in the surrounding area that are reasonably expected by an approval authority to be impacted by the proposed application. ▪ A review of recent aerial photography did not identify any existing livestock facilities within 1,500 metres of the Subject Lands.
Feasibility – Impacts on	h) any adverse impacts on the agri-food network, including agricultural operations, from expanding settlement areas	viii. Any adverse impacts on the agri-food network, including agricultural operations, from expanding	<ul style="list-style-type: none"> ▪ The Proposed Expansion abuts the eastern and a portion of the southern limit of the existing Bradford Settlement Area

Agricultural uses	would be avoided, or if avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment;	settlement areas would be avoided, or if avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment; and	Boundary. As noted above, no livestock operations were identified within a 1,500-metre boundary of the Proposed Expansion. Further as noted above, there are no reasonable alternatives that avoid prime agricultural land. Given the adjacent urban context to the east and in part to the north, the lack of adjacent livestock operations and the absence of alternatives that avoid prime agricultural areas, development of the lands for urban uses will result in minimal impacts on the agri-food network and remaining agricultural operations.
Feasibility – Resources and Public Health and Safety	i) the policies of Sections 2 (Wise Use and Management of Resources) and 3 (Protecting Public Health and Safety) of the PPS are applied;	ix. The policies of Sections 2 (Wise Use and Management of Resources) and 3 (Protecting Public Health and Safety) of the Provincial Policy Statement are applied.	<ul style="list-style-type: none"> ▪ A series of watercourses, an unevaluated wetland, and two discrete areas within the County Greenlands designation are all present within the Proposed Expansion as identified on Schedules B – Land Use and D – Wetlands and Areas of Natural and Scientific Interest to the Adopted OP and Schedule 5.1 to the County OP. These features and their associated buffers would be assessed during the requisite secondary planning exercise undertaken by the Town. Any preservation or mitigation measures would be identified and implemented through future Planning Act applications however, given their size and location it is not anticipated that they will significantly constrain the development of the Proposed Expansion. ▪ It is suggested that a Cultural Heritage and Archaeological Assessment would be completed by the Town in association with the required secondary planning exercise to implement any settlement area expansion. Identifying any constraints on development as a result of potential archaeological or cultural heritage resources as early on in the planning process as possible helps to ensure the Town designates a significant quantum of land and is able to achieve growth forecasts. ▪ No areas of aggregate resources or potential are identified on Schedule 5.2.1 to the County OP or Schedule D-4 to the Adopted OP. ▪ It is also anticipated that a natural hazards assessment would be completed by the Town as part of a Master Environmental Servicing Plan in association with the required secondary planning exercise to implement any settlement area expansion. The intent would be to analyze the existing Regulatory floodplain condition, delineate the

			proposed Regulatory floodplain limits, determine the proposed re-development limits, and recommend re-development strategies to mitigate flooding impacts on the Proposed Expansion.
Feasibility – Other provincial plans and source protection plans	j) the proposed expansion would meet any applicable requirements of the Greenbelt, Oak Ridges Moraine Conservation, Niagara Escarpment, and Lake Simcoe Protection Plans and any applicable source protection plan; and		<ul style="list-style-type: none"> ▪ Lands within the Proposed Expansion are not located within the Greenbelt Plan area, Oak Ridges Moraine Conservation Plan area or Niagara Escarpment Plan area, but are located within the Lake Simcoe Protection Plan area and the WHPA-Q2 of the South Georgian Bay Lake Simcoe Source Water Protection Plan.
Feasibility – Greenbelt Plan limitations	<p>k) within the Protected Countryside in the Greenbelt Area:</p> <ul style="list-style-type: none"> i. the settlement area to be expanded is identified in the Greenbelt Plan as a Town/Village; ii. the proposed expansion would be modest in size, representing no more than a 5 per cent increase in the geographic size of the settlement area based on the settlement area boundary delineated in the applicable official plan as of July 1, 2017, up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area; iii. the proposed expansion would support the achievement of complete communities or the local agricultural economy; iv. the proposed uses cannot be reasonably accommodated within the existing settlement area boundary; v. the proposed expansion would be serviced by existing municipal water and wastewater systems without impacting future intensification opportunities in the existing settlement area; and vi. expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited. 		<ul style="list-style-type: none"> ▪ Lands within the Proposed Expansion are not located within the Greenbelt Plan area.
Implementation		3.2.28 Prior to the implementation of a <i>settlement area</i> expansion, an Amendment to this Plan shall be required, provided the County is satisfied that the policies of this Plan have been met.	<ul style="list-style-type: none"> ▪ A further amendment to the County OP would occur following a Town Council adopted scenario for growth to conform to the draft COPA.

While we continue to stress the importance of ensuring that the housing mix allocated to the Town adequately reflects the market housing mix as directed by the Growth Plan, we support the direction of the County's most recent projections with a higher proportion of units in the DGA and a significantly higher allocation of lands to the DGA.

In our opinion, straying too far from the housing market demand will ultimately impact the desirability of the Town as a place to live and will cause housing prices to further escalate by artificially constraining supply. The Town is planned to become an important employment centre for the Greater Toronto Area in the future and it will be essential that the Town remains as an attractive residential community to support the future economy of the County.

We would be pleased to meet with Town staff to discuss the contents of this letter. Should you have any comments or questions, we can be reached at kmackinnon@klmplanning.com and tschilling@klmplanning.com.

Yours very truly,

KLM PLANNING PARTNERS INC.



Keith MacKinnon, MCIP, RPP
Partner







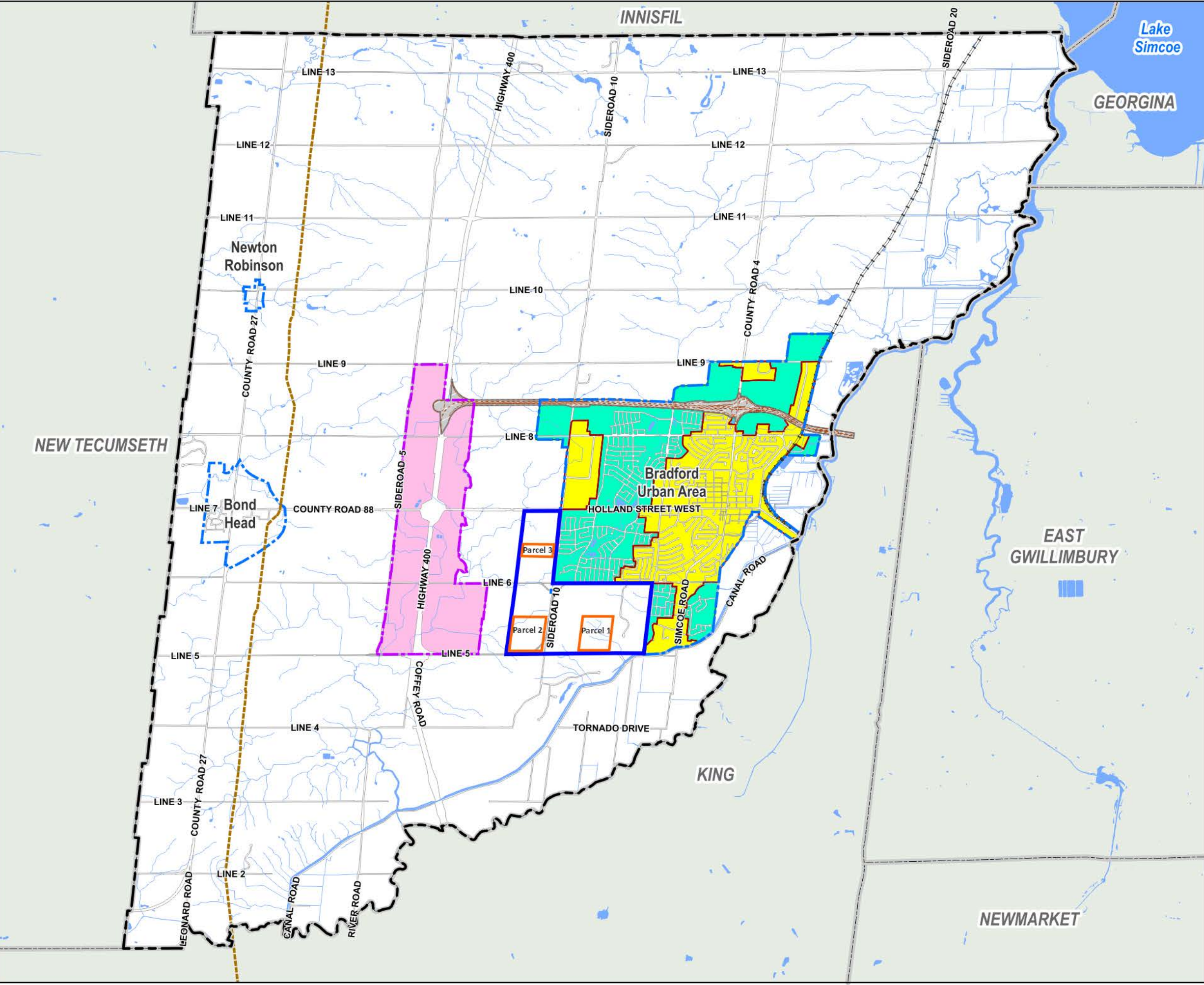
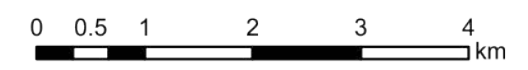
Tim Schilling, MCIP, RPP
Senior Planner

cc: Nathan Westendorp, Director of Planning, County of Simcoe

**SCHEDULE A
 URBAN STRUCTURE AND
 BUILT BOUNDARY**



-  Bradford West Gwillimbury Boundary
-  Settlement Area Boundary
-  Highway 400 Employment Lands Boundary
-  Roads
-  Highway 400 - 404 Link (Future)
-  Railway
-  Trans Canada Pipeline
-  Watercourses
-  Delineated Built Boundary
-  Designated Greenfield Area
-  Highway 400 Employment Lands
-  Proposed Expansion
-  Parcels





MEMORANDUM

To: Mohamad Al Ashkar, B.Eng.
Melrose Investments Inc.

From: Piotr Szponar, P.Eng.
RAND Engineering Corporation

Date: July 11th, 2022

Project No.: 20037

Subject: Melrose Investments Inc. Properties
Urban Expansion Area
The Town of Bradford West Gwillimbury

Further to your request, we have reviewed the storm drainage, wastewater and water servicing requirements for three (3) Melrose Investments Inc. properties located in the Town of Bradford West Gwillimbury. As shown in **Figure 1**, the Melrose properties are generally located within the future potential expansion of urban area, southwest of the existing Town's urban limits.

The purpose of this memorandum is to provide a servicing assessment of the Melrose properties at a conceptual level and to demonstrate that with certain improvements to the existing municipal infrastructure, the properties are serviceable.

The information provided in this memorandum is intended to assist the municipality and other regulatory agencies in considering the subject properties as part of the future Town of Bradford West Gwillimbury urban area expansion.

The Melrose properties are proposed for the future residential developments and will consist of low and medium density units, park blocks and stormwater management blocks. **Figure 1** shows the subject properties as follows:

- 14.1 Ha Property 1 located at 2572 10th Sideroad
- 35.6 Ha Property 2 located at 3174 5th Line
- 40.2 Ha Property 3 located at 2944 5th Line



1.0 Existing Conditions

The potential urban expansion area and subject properties are located within the West Holland River Subwatershed and within the jurisdiction of the Lake Simcoe Region Conservation Authority (LSRCA). The subject properties comprise mainly agricultural lands.

A review of the properties subsurface conditions has been carried out using geotechnical information provided in the following documents:

- Property 1 - July 2022 “*Preliminary Geotechnical Investigation Proposed Residential Subdivision Development*”, prepared by Landtek Limited.
- Property 2 - April 2022 “*Preliminary Geotechnical Investigation Future Residential Development*”, prepared by Landtek Limited.
- Property 3 - December 2013 “*A General Geotechnical Investigation for Proposed Residential Development*”, prepared by Soil Engineers Ltd.

The results of the investigation indicate that the soil stratigraphy of three sites consists generally of layer of topsoil extending to a depth of 0.3 - 0.45 m over a stratum of silty clay or clayey silt overlaying a native silty sand to silt till.

2.0 Wastewater Servicing

As shown conceptually in **Figure 2**, new developments within the urban expansion lands would require a wastewater sewer system draining easterly towards the existing Bradford West Gwillimbury wastewater treatment plant (WWTP) located at Dissette Street. The proposed wastewater system will convey the post-development flows via a new sewage pumping station and forcemain.

Based on the assumed population density of 55 person/ha it is estimated that a total flow of approximately 82 L/s from the Melrose developments will be discharging into the Bradford West Gwillimbury wastewater system.

Further detailed study and assessment will be required to determine the preferred route of the wastewater system for the subject lands and identify new additions and upgrades to the existing wastewater system.



3.0 Water Servicing

The potential urban expansion lands would be located within Pressure Zone 1 of the Bradford West Gwillimbury water system. There are currently existing trunk watermains on 10th Sideroad, County Road 88 and 5th Line which would service new developments within the potential urban expansion lands.

Based on the preliminary water servicing assessment, the total maximum hourly demand from the subject lands will be approximately 51 L/s. It is expected that the upgrades would be required to the Town's water supply and water storage reservoirs to provide additional capacity for the new developments.

4.0 Stormwater Management

Proposed new developments will be subject to strict stormwater management requirements to satisfy water quality, erosion and quantity control, water balance and phosphorus reduction objectives for the West Holland River Subwatershed.

The stormwater management strategy for the proposed urban expansion lands will include the utilization of stormwater management facilities and innovative Best Management Practices (BMP) and Low Impact Development Practices (LID).

The potential urban expansion lands are currently drained by a number of natural swales and watercourses in westerly and southerly directions.

As shown in **Figure 3**, several stormwater management facilities will be required to control post-development flows with drainage outlets conforming to the existing drainage conditions.

It is anticipated that storm drainage control for the subject properties will be provided within stormwater management wet type ponds or underground water storage facilities, designed to provide water quality control in accordance with the "enhanced" protection level for the receiving watercourse. The SWM facilities will also provide water quantity control for the 2 - 100 year storm events.

5.0 Conclusions

This memorandum identifies the wastewater, water and stormwater management requirements at the conceptual level in support of the Melrose development plans within the future expansion of the Bradford West Gwillimbury urban area.

Based on our servicing assessment, it is concluded that:

1. It is expected that the expansion of the Bradford West Gwillimbury infrastructure to accommodate the subject properties will require comprehensive wastewater, water and stormwater management assessment.



2. The servicing strategies for the future urban expansion will be conducted in accordance with the Town of Bradford West Gwillimbury, LSRCA and County of Simcoe design criteria and requirements.
3. The preliminary servicing assessment shows that the subject properties can be developed by extension and improvements of the local municipal infrastructure.

We trust the above information is sufficient for your purposes. Please contact me if you have any questions or require clarification.

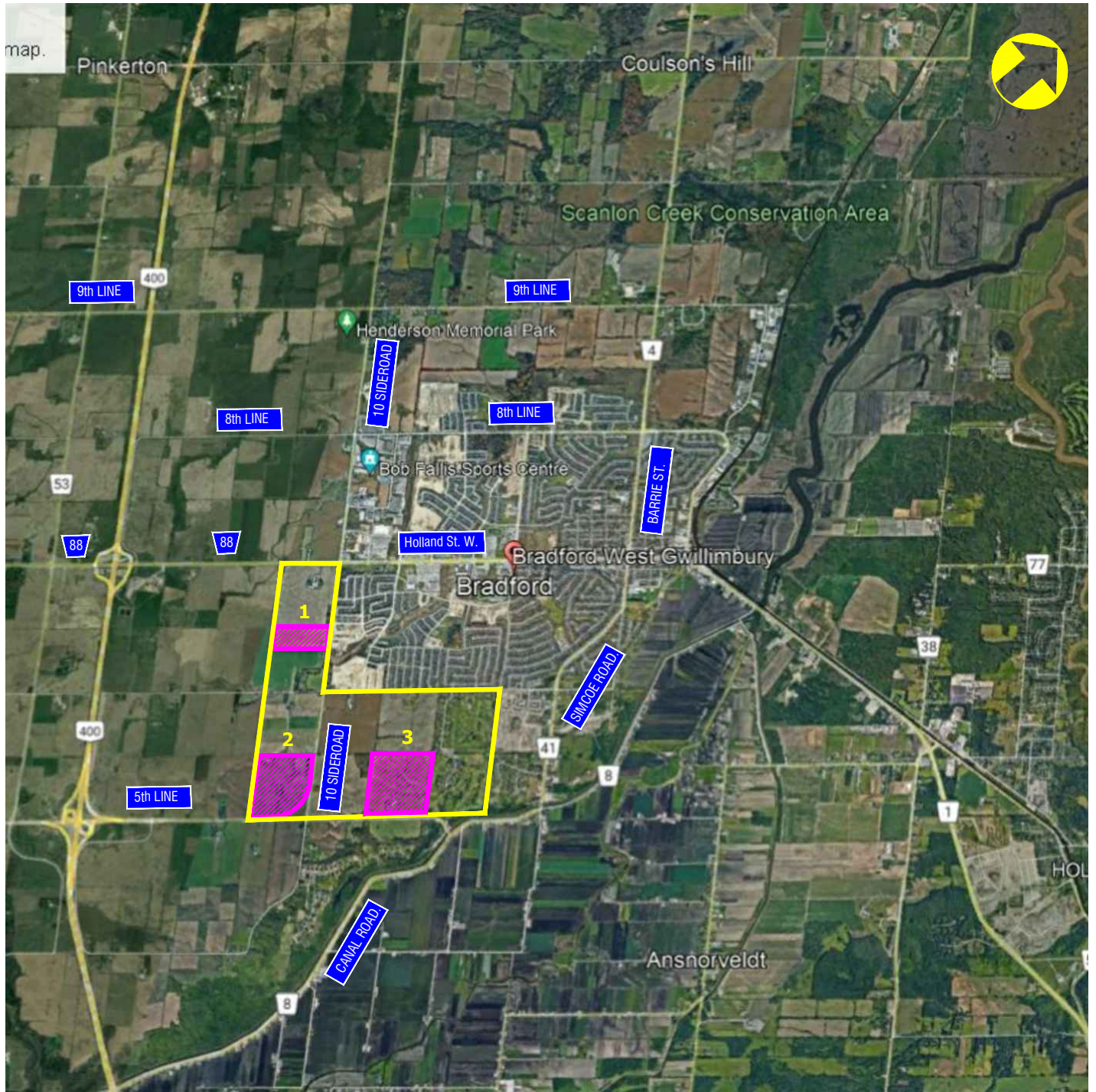
Yours truly,

RAND Engineering Corporation

A handwritten signature in black ink, appearing to read "P. Szponar", with a long horizontal flourish extending to the right.

Piotr Szponar, P.Eng.

copy: Tim Schilling – KLM Planning Partners Inc.
Vito Cavallo – RAND Engineering Corporation



LEGEND

-  POTENTIAL URBAN EXPANSION AREA BOUNDARY
-  MELROSE INVESTMENTS INC. LANDS

MELROSE INVESTMENTS INC.

TOWN OF BRADFORD WEST GWILLIMBURY

PROJECT No. 20037

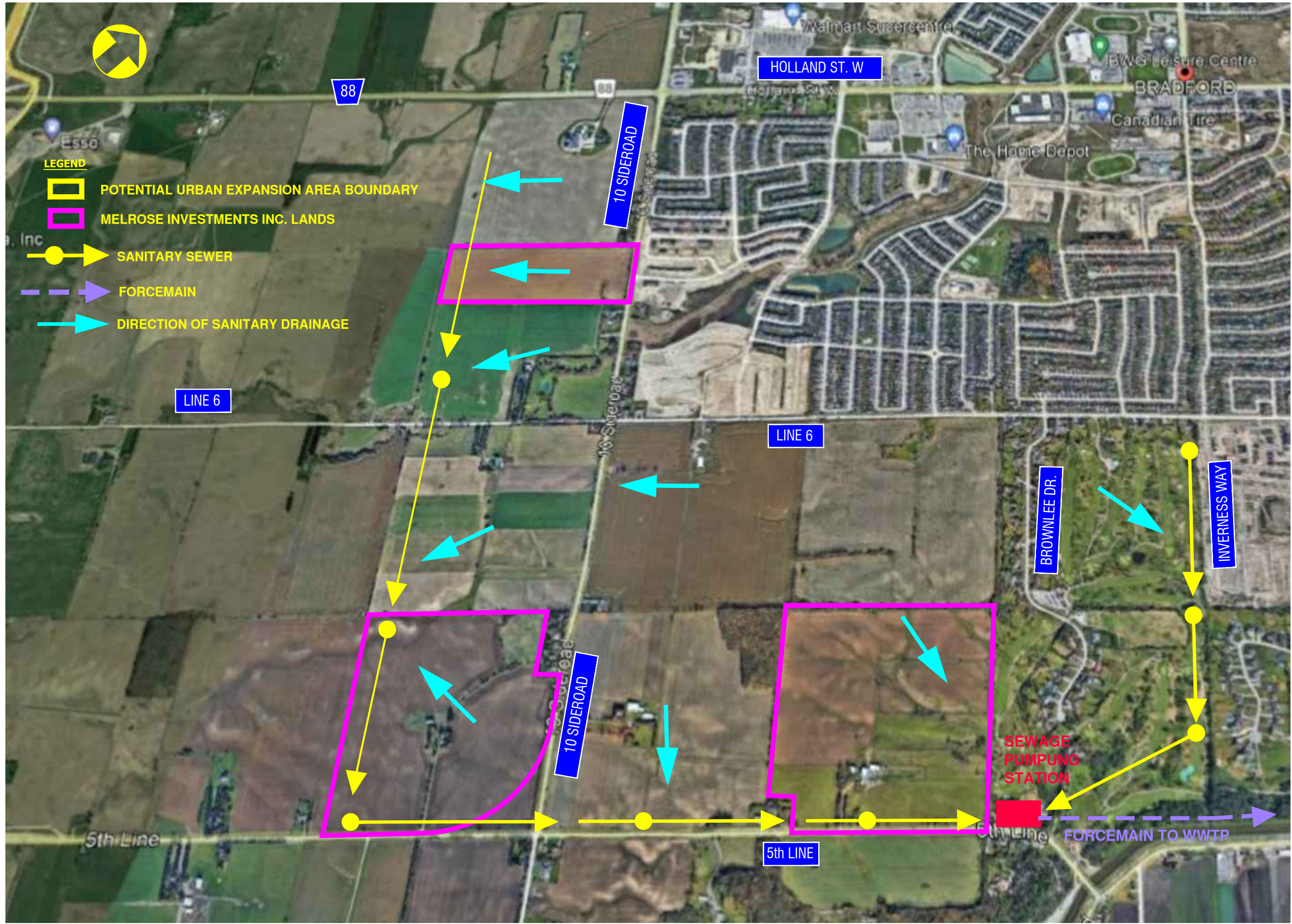
LOCATION PLAN

FIGURE No. 1

NOT TO SCALE



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MELROSE INVESTMENTS INC.

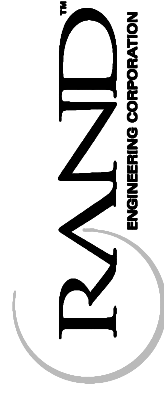
TOWN OF BRADFORD WEST GWILLIMBURY

PROJECT No. 20037

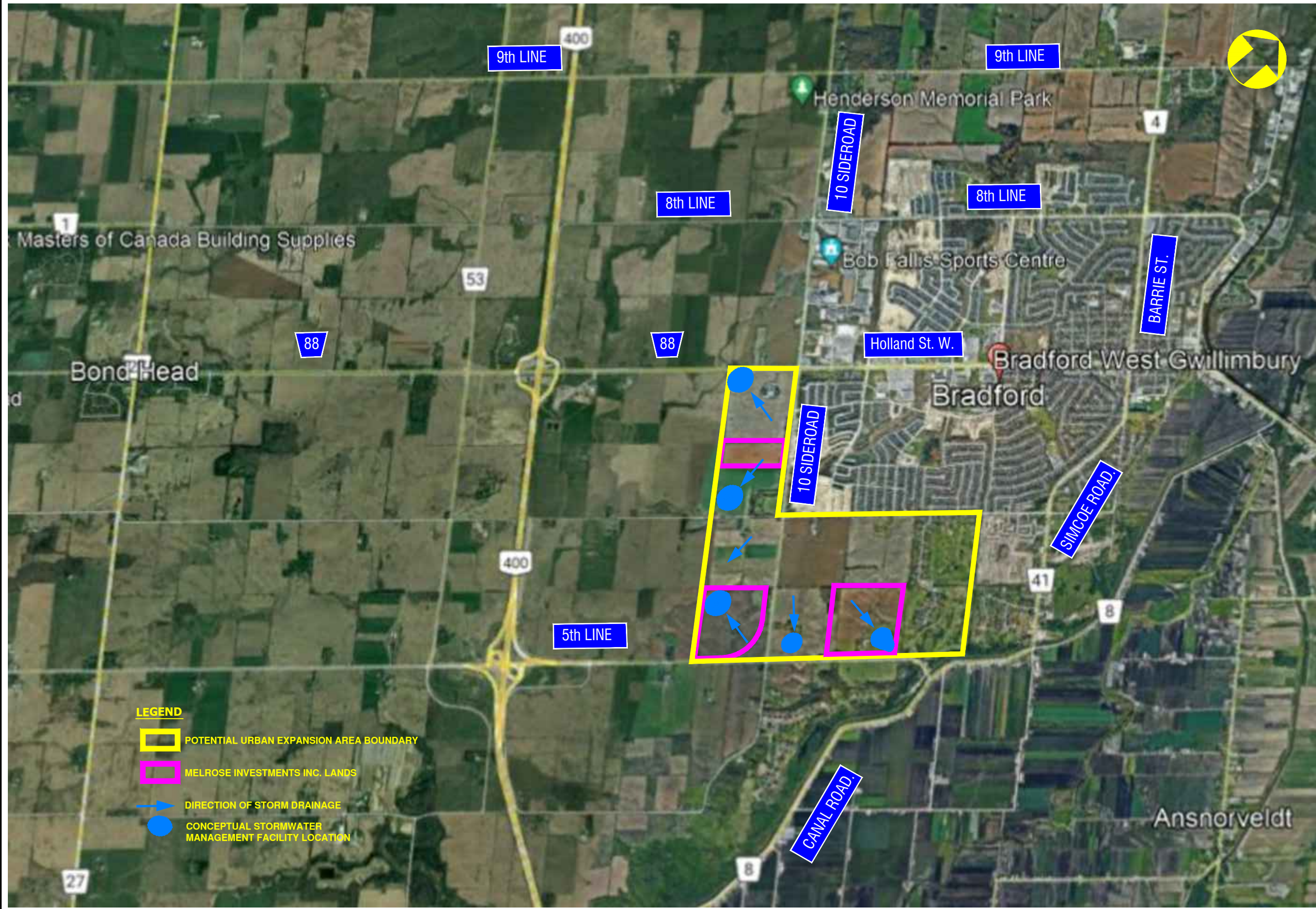
FIGURE No. 2

WASTEWATER SERVICING PLAN

NOT TO SCALE



R:\20\20037\Figure 3_Stormwater Management.dwg | Jun 17, 2022 - 4:25pm



MELROSE INVESTMENTS INC.

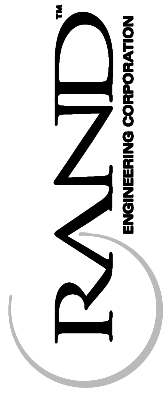
STORMWATER MANAGEMENT PLAN

TOWN OF BRADFORD WEST GWILLIMBURY

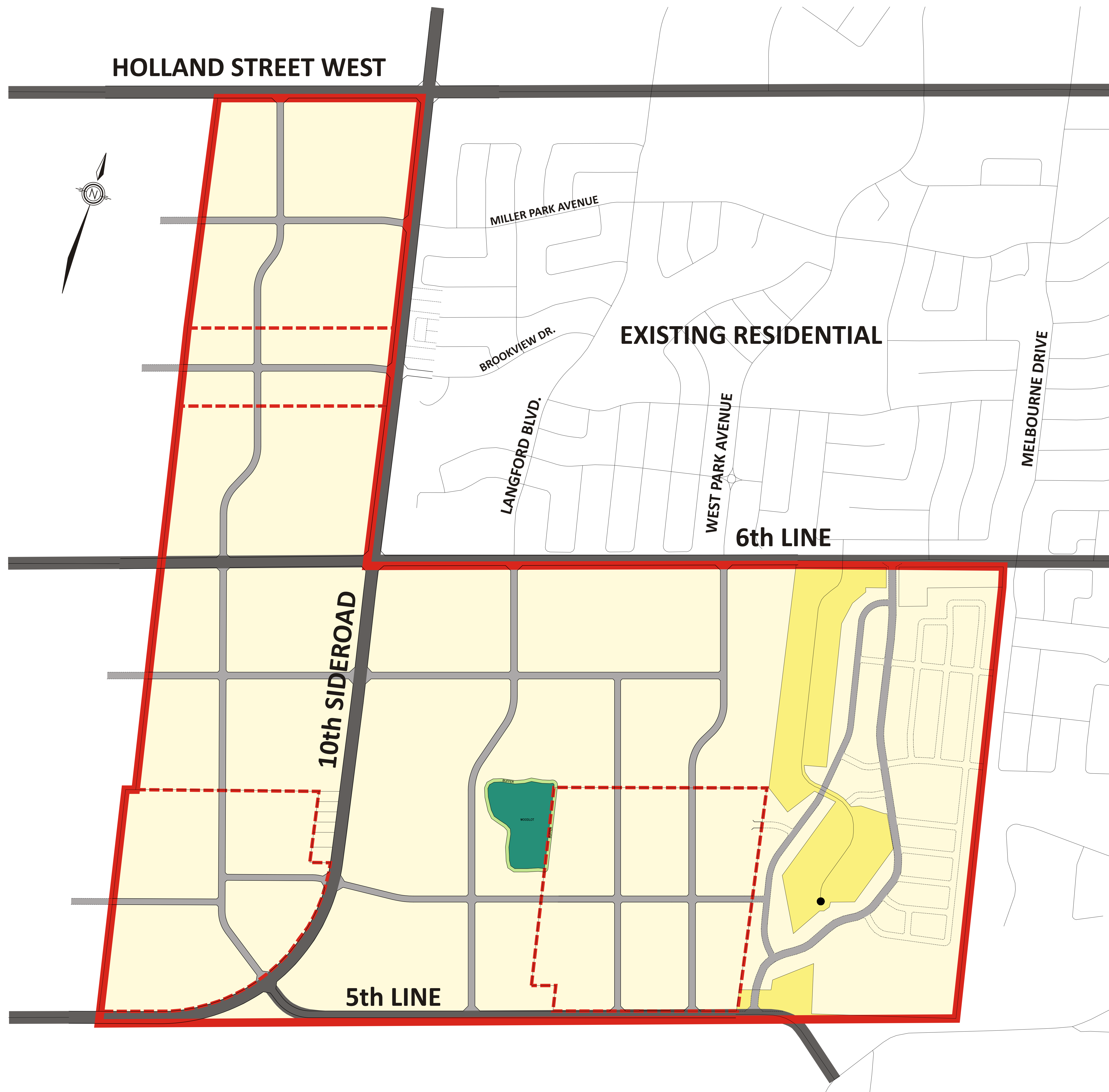
PROJECT No. 20037

FIGURE No. 3

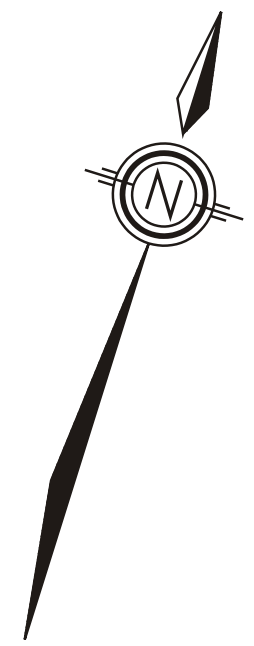
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BRADFORD WEST GWILLIMBURY COMPOSITE PLAN



- FUTURE RESIDENTIAL
- EXISTING RESIDENTIAL
- BUFFER
- WOODLOT
- ARTERIAL ROADS
- COLLECTOR ROADS
- MELROSE PROPERTIES
- SUBJECT LANDS



P-2687 - 3266 - 3312 - COMPOSITE PLAN

1:5000
JAN 20, 2023



KLM
PLANNING PARTNERS INC.
Planning • Design • Development
64 JARDIN DRIVE - UNIT 1B, CONCORD, ONT. L4K 3P3
PHONE (905) 669-4055 FAX (905) 669-0097 design@klmplanning.com



MEMORANDUM

To: Mohamad Al Ashkar, B.Eng.
Melrose Investments Inc.

From: Piotr Szponar, P.Eng.
RAND Engineering Corporation

Date: January 31st , 2023

Project No.: 20037

Subject: Municipal Servicing Memorandum
Melrose Investments Inc. Properties
Proposed Settlement Expansion Area
The Town of Bradford West Gwillimbury
County of Simcoe

1.0 Introduction

Further to your request, we have reviewed the storm drainage, wastewater and water servicing infrastructure requirements for three (3) Melrose Investments Inc. properties located in the Town of Bradford West Gwillimbury. As shown in **Figure 1**, the Melrose properties (GB (Bradford) Inc., GB (Bradford 2) Inc. and GB (Bradford 3) Inc.) are generally located within the future potential expansion of the urban area of approximately 400 ha, southwest of the existing Town's urban limits.

The Melrose properties are proposed for future residential developments and will consist of low and medium density units, park blocks and stormwater management blocks. The attached **Figure 1** shows the following three Melrose properties within the potential Bradford settlement area expansion:

- 40.0 ha GB (Bradford) Inc. Property 1, located at 2944 5th Line
- 34.2 ha GB (Bradford 2) Inc. Property 2, located at 3174 5th Line
- 14.2 ha GB (Bradford 3) Inc. Property 3, located at 2572 10th Sideroad

The purpose of this memorandum is to provide a servicing assessment of the 400 ha settlement area expansion at a conceptual level and to demonstrate that with certain improvements to the existing municipal infrastructure, these lands are serviceable. The information provided in this memorandum is



intended to assist the municipality and other regulatory agencies in considering the Melrose properties as part of the future Town of Bradford West Gwillimbury urban area expansion.

2.0 Development Concept

The conceptual development details of the Bradford settlement area expansion have been provided by KLM Planning Partners Inc. and are illustrated on the attached **Figure 2**.

The concept plan shows a proposed collector road system with connections to the existing transportation corridors, including 10th Sideroad, 5th Line, 6th Line, Holland Street West/County Road 88 and 8th Line. The 400 ha settlement area expansion will consist of single family houses, townhouse blocks and apartment buildings, with a projected density of 55 residents per hectare or 8,500 residential units.

Estimated population for the 400 ha settlement area expansion is as follows:

Single Family Units – 35% of total area – 140 ha

Total number of units – 2,975

3.00 persons per unit

Total population – 8,925

Townhouses – 60% of total area – 240 ha

Total number of units – 5,100

2.48 persons per unit

Total population – 12,648

Apartments – 5 % of total area – 20 ha

Total number of units – 425

2.1 persons per unit

Total population – 893

The total estimated population of the proposed urban expansion area will be approximately 22,466 people.

3.0 Background Information

The following is a list of the background studies and reference documents used in the preparation of this memorandum:

- **Bradford West Gwillimbury**, “*Engineering Design Criteria Manual*”, September 2015.
- **C.C. Tatham & Associates Ltd.**, “*Water Supply and Wastewater Servicing Master Plan Update, Town of Bradford West Gwillimbury, Class EA Final Study Report*”, March 31, 2011.



- **R.J. Burnside.**, “*Town of Bradford West Gwillimbury Master Servicing Study*”, July 2010.
- **RVA**, “*Simcoe Water and Wastewater Service Delivery Review – Final Review*”, January 26, 2022.
- **SCS Consulting Group Ltd.**, “*Preliminary External Servicing Investigation and Financial Review, Bradford Highlands Golf Club Redevelopment, Town of Bradford West Gwillimbury*”, January 31, 2017.

4.0 Existing Conditions

The potential urban expansion area and subject properties are located within the West Holland River Subwatershed and within the jurisdiction of the Lake Simcoe Region Conservation Authority (LSRCA). The expansion area comprises mainly agricultural lands.

A review of the Melrose properties subsurface conditions has been carried out using geotechnical information provided in the following documents:

- Property 1 - December 2013 “*A General Geotechnical Investigation for Proposed Residential Development*”, prepared by Soil Engineers Ltd.
- Property 2 - April 2022 “*Preliminary Geotechnical Investigation Future Residential Development*”, prepared by Landtek Limited.
- Property 3 - July 2022 “*Preliminary Geotechnical Investigation Proposed Residential Subdivision Development*”, prepared by Landtek Limited.

The results of the investigation indicate that the soil stratigraphy of three sites consists generally of layer of topsoil extending to a depth of 0.3 - 0.45 m over a stratum of silty clay or clayey silt overlaying a native silty sand to silt till.

5.0 Wastewater Servicing

As shown conceptually on the attached **Figure 3**, new developments within the 400 ha urban expansion area would require a wastewater sewer system conveying flows to the existing Bradford Wastewater Treatment Plant (WWTP), located at Dissette Street.

The proposed wastewater servicing plan for the urban expansion area will be designed as a combination of gravity and forcemain wastewater systems. As shown in **Figure 3**, the post-development flows will be conveyed via two new sewage pumping stations, located at the southwest limit of the urban expansion area and 5th Line. The combined flows from 400 ha development will be conveyed from the pumping station located at 5th Line via a proposed forcemain the Bradford WWTP. The approximately 6 km long forcemain will be installed along 5th Line, Canal Road, Bridge Street and Dissette Street within the Town’s limits.



Wastewater demands were estimated using the Town of Bradford West Gwillimbury design criteria. Based on the projected population of 22,466, it is estimated that a total flow of approximately 272 L/s from the 400 ha urban expansion area will be discharging to the Bradford WWTP. The preliminary wastewater flow design calculations are summarized in the attached **Table 1**.

It is expected that further detailed study and assessment will be required to determine the preferred route of the wastewater system for the subject lands and identify new additions and upgrades to the existing wastewater system.

6.0 Water Servicing

Presently, the water supply to Bradford West Gwillimbury is provided via a water transmission main from the Lakeshore Water Treatment Plant (WTP) located in Alcona, in the Town of Innisfil. The 400 ha urban expansion area would be located within Pressure Zone 1 of the Bradford West Gwillimbury water distribution system.

The attached **Figure 4** shows the proposed water servicing and distribution system within the urban expansion area. The system will be connected to a network of the existing municipal watermains located north and east of the urban expansion area.

Based on the preliminary water servicing assessment, the total maximum hourly demand from the subject lands will be approximately 234 L/s. Preliminary water demand calculations are provided in the attached **Table 2**.

It is expected that the upgrades would be required to the Town's water supply and water storage reservoirs to provide additional capacity for the new developments.

7.0 Stormwater Management

Proposed new developments will be subject to strict stormwater management requirements to satisfy water quality, erosion and quantity control, water balance and phosphorus reduction objectives for the West Holland River Subwatershed in accordance with the requirements and design standards of the Town of Bradford West Gwillimbury, Lake Simcoe Region Conservation Authority (LSRCA), Simcoe County and Ministry of Environment, Conservation and Parks (MECP). The stormwater management strategy for the proposed urban expansion lands will include the utilization of stormwater management facilities and innovative Best Management Practices (BMP) and Low Impact Development Practices (LID).

The potential urban expansion lands are currently drained by a number of natural swales and watercourses in westerly and southerly directions. As shown on the attached **Figure 5**, seven (7) stormwater management facilities will be required to control post-development flows with drainage outlets conforming to the existing drainage conditions. It is anticipated that storm drainage control for the subject properties will be provided within stormwater management wet type ponds or underground water storage facilities, designed to provide water quality control in accordance with the "enhanced" protection



level for the receiving watercourse. The SWM facilities will also provide water quantity control for the 2 - 100 year storm events.

8.0 Preliminary Wastewater and Water Servicing Cost Analysis

For the purpose of this memorandum, we have conducted a preliminary cost analysis of the major wastewater and water servicing infrastructure required for the proposed 400 ha urban expansion area. The attached **Table 3** summarizes the cost of the sanitary pumping stations, sanitary sewers, forcemains and trunk watermains along the proposed collector roads. The total estimated cost of the required wastewater and water servicing infrastructure is approximately \$54,000,000.00.

9.0 Conclusions

This memorandum identifies the wastewater, water and stormwater management requirements at the conceptual level in support of the Melrose development plans within the future expansion of the Bradford West Gwillimbury urban area.

Based on our servicing assessment, it is concluded that:

1. It is expected that the expansion of the Bradford West Gwillimbury infrastructure to accommodate the subject properties will require comprehensive wastewater, water and stormwater management assessment.
2. The servicing strategies for the future urban expansion will be conducted in accordance with the Town of Bradford West Gwillimbury, LSRCA, MECP and County of Simcoe design criteria and requirements.
3. The preliminary servicing assessment shows that the subject properties can be developed by extension and improvements of the local municipal infrastructure.

We trust the above information is sufficient for your purposes. Please contact me if you have any questions or require clarification.

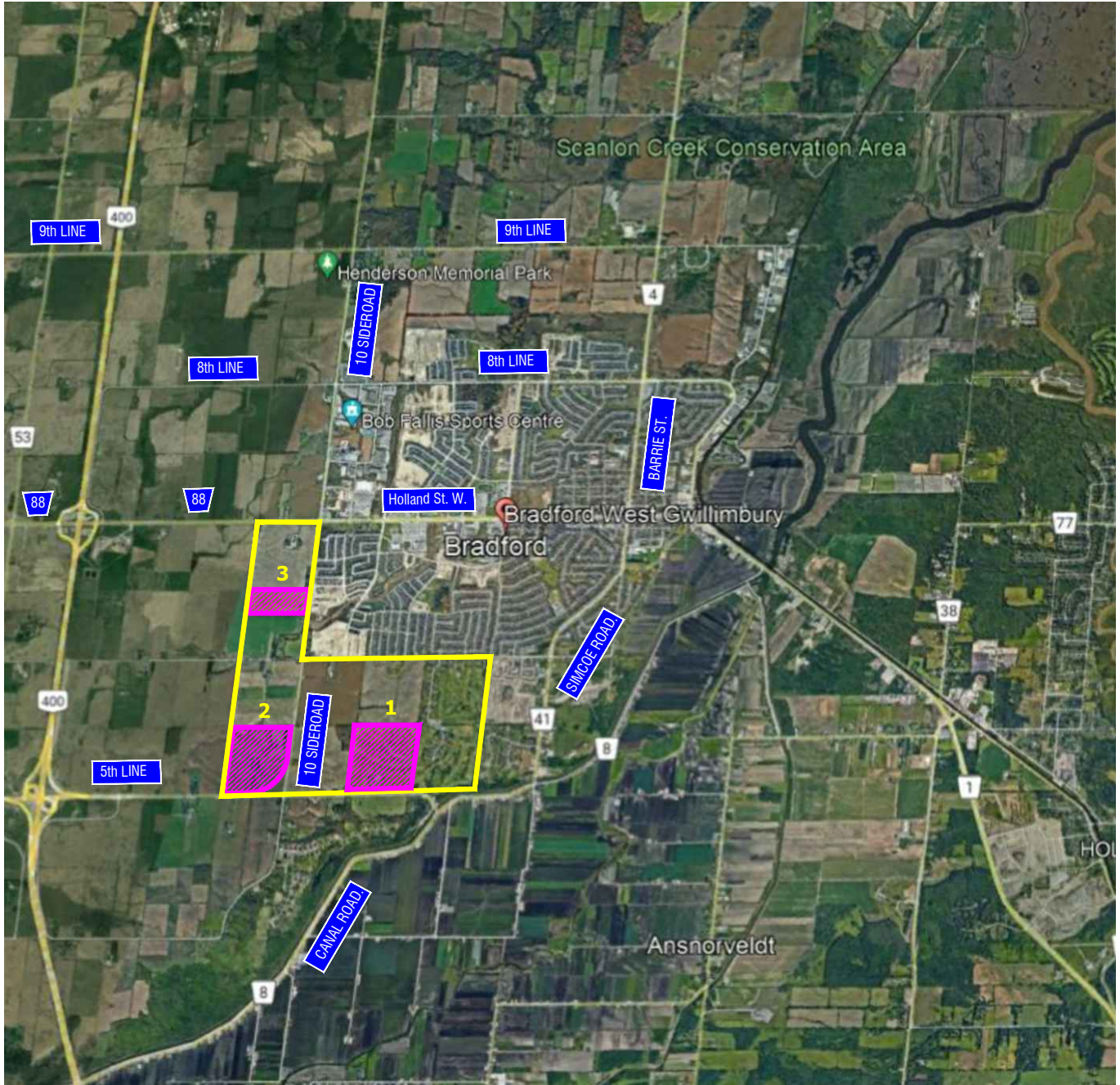
Yours truly,

RAND Engineering Corporation

A handwritten signature in black ink, appearing to read "P. Szponar", written over a light grey circular stamp.

Piotr Szponar, P.Eng.

copy: Tim Schilling – KLM Planning Partners Inc.
Vito Cavallo – RAND Engineering Corporation



LEGEND

-  POTENTIAL URBAN EXPANSION AREA BOUNDARY
-  MELROSE INVESTMENTS INC. LANDS

MELROSE INVESTMENTS INC.

TOWN OF BRADFORD
WEST GWILLIMBURY

PROJECT No. 20037

LOCATION PLAN

FIGURE No. 1

NOT TO SCALE





HOLLAND STREET WEST

(COUNTY ROAD 88)



MILLER PARK AVENUE

BROOKVIEW DR.

LANGFORD BLVD.

EXISTING RESIDENTIAL

WEST PARK AVENUE

MELBOURNE DRIVE

6th LINE

3

10th SIDEROAD

2

1

5th LINE

LEGEND

 FUTURE RESIDENTIAL

 EXISTING RESIDENTIAL

 BUFFER

 WOODLOT

 ARTERIAL ROADS

 COLLECTOR ROADS

 MELROSE PROPERTIES

MELROSE INVESTMENTS INC.

TOWN OF BRADFORD
WEST GWILLIMBURY

PROJECT No. 20037

PROPOSED SETTLEMENT EXPANSION AREA

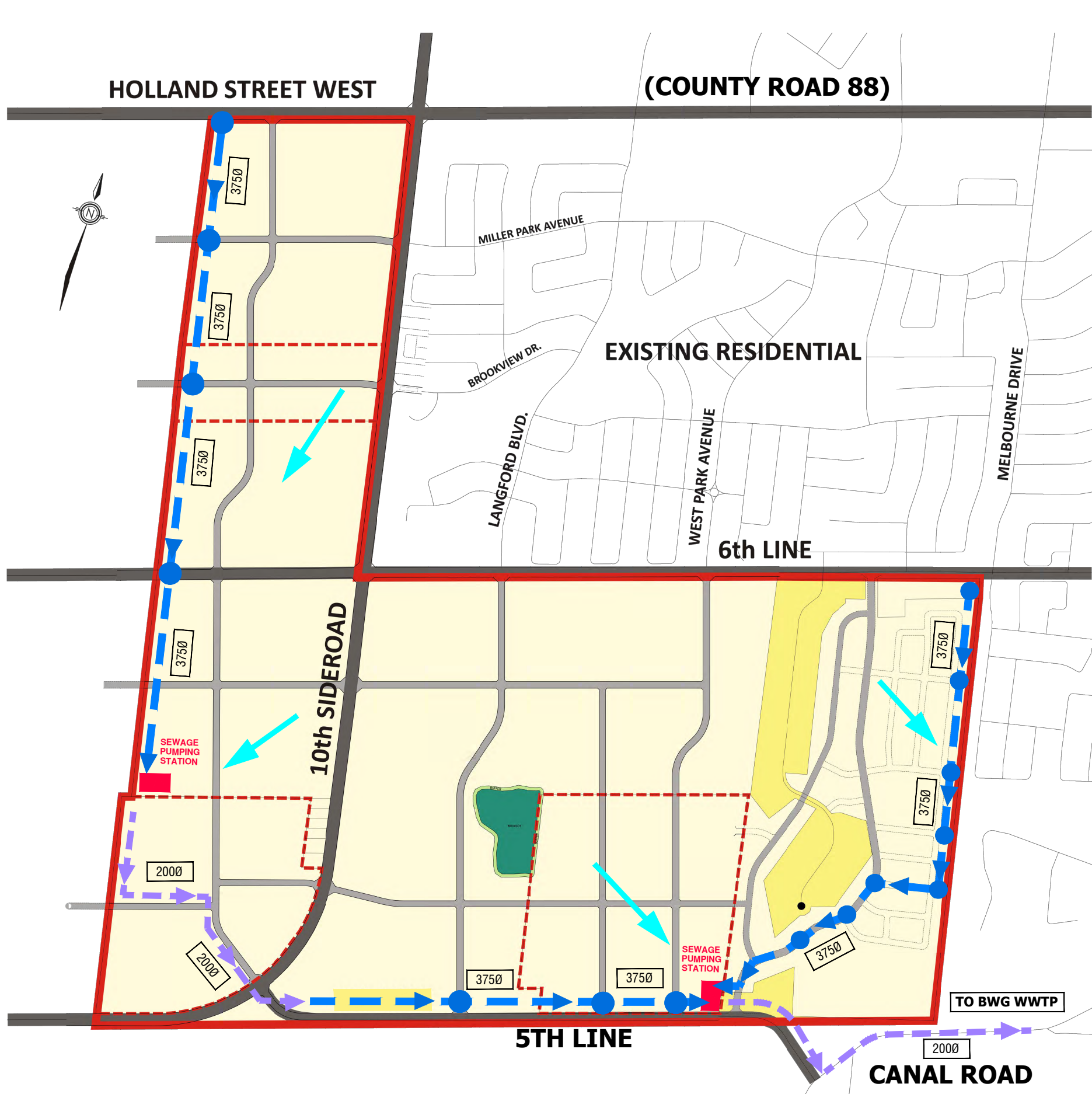
FIGURE No. 2

NOT TO SCALE



R:\20\20037\FSR\2023-01-25 (Latest)\Figure 2_Development_Plan.dwg Jan 27, 2023 - 10:51am Layout: Figure 2

R:\20\20037\FSR\2023-01-25 (Latest)\Figure 3_Wastewater Servicing Plan.dwg | Jan 31, 2023 - 1:58pm



LEGEND

- FUTURE RESIDENTIAL
- EXISTING RESIDENTIAL
- BUFFER
- WOODLOT
- ARTERIAL ROADS
- COLLECTOR ROADS
- MELROSE PROPERTIES
- SUBJECT LANDS
- GRAVITY SANITARY SEWER
- FORCEMAIN
- DIRECTION OF SANITARY DRAINAGE

MELROSE INVESTMENTS INC.

FIGURE No. 3

WASTEWATER SERVICING PLAN

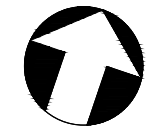
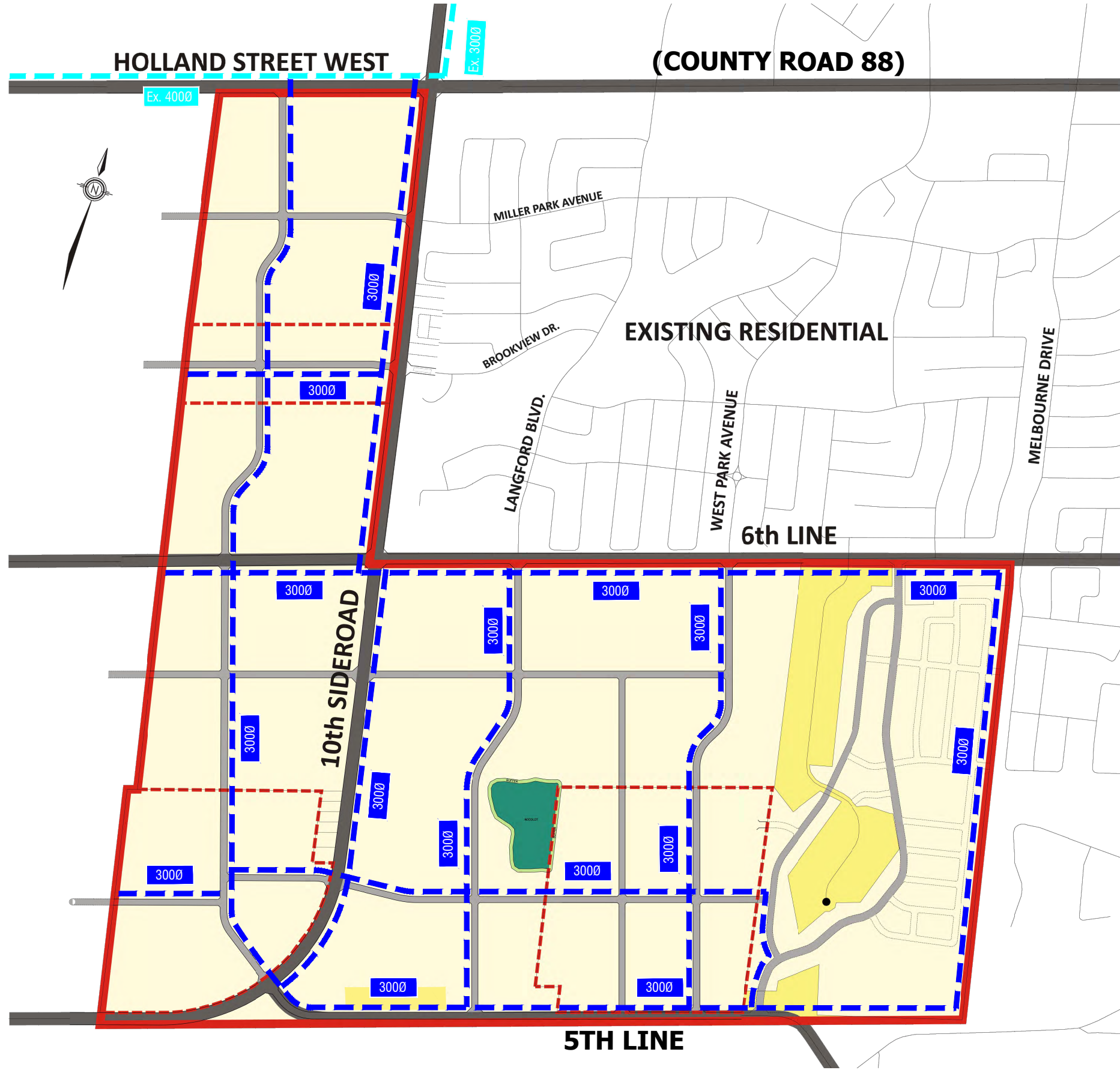
TOWN OF BRADFORD
WEST GWILLIMBURY

NOT TO SCALE



PROJECT No. 20037

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LEGEND

- FUTURE RESIDENTIAL
- EXISTING RESIDENTIAL
- BUFFER
- WOODLOT
- ARTERIAL ROADS
- COLLECTOR ROADS
- MELROSE PROPERTIES
- SUBJECT LANDS
- EXISTING WATERMAIN
- PROPOSED WATERMAIN

MELROSE INVESTMENTS INC.

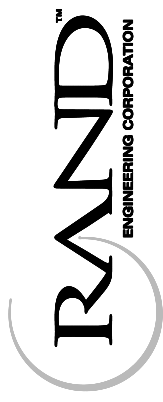
WATER SERVICING PLAN

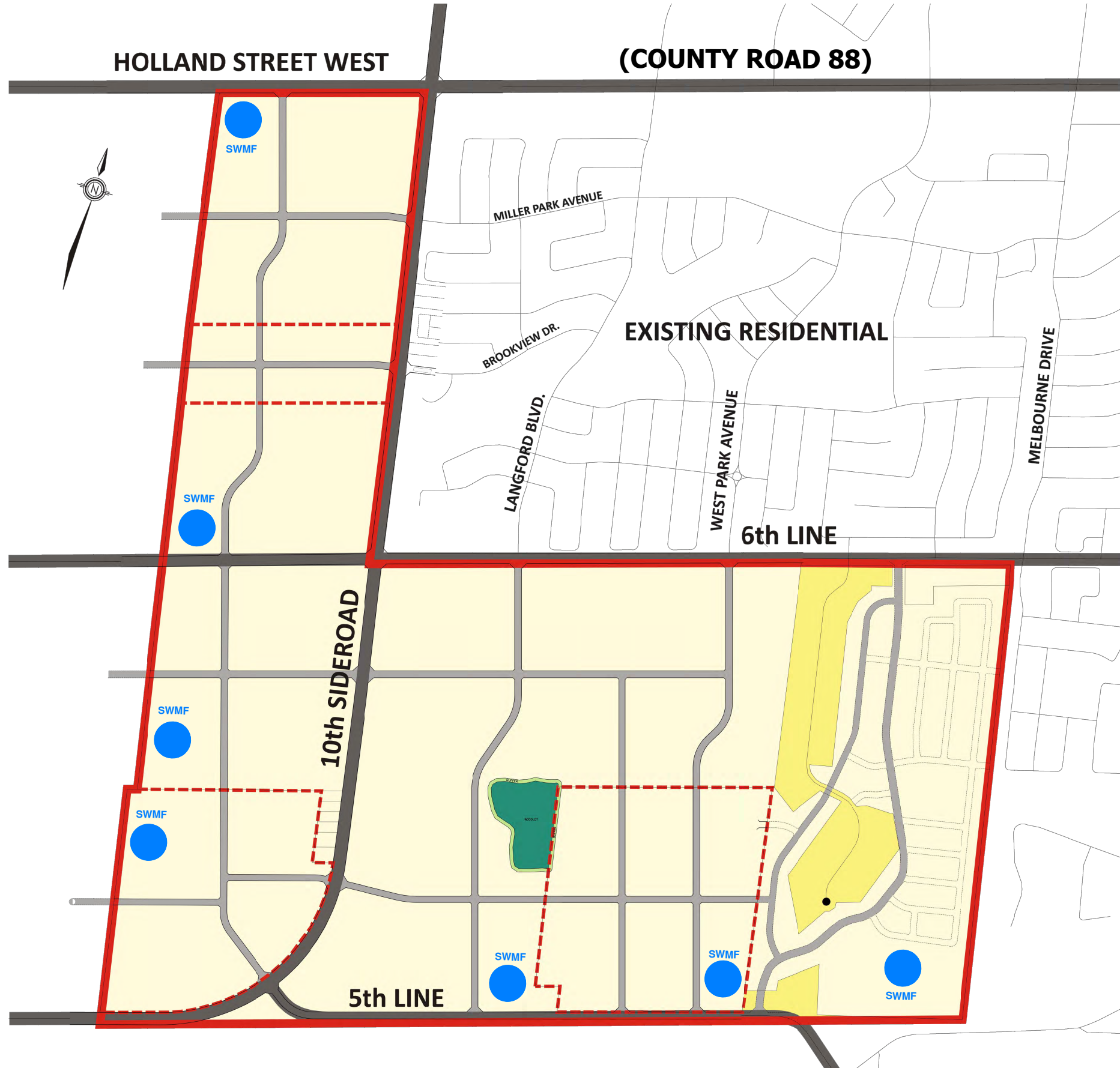
TOWN OF BRADFORD
WEST GWILLIMBURY

PROJECT No. 20037

FIGURE No. 4

NOT TO SCALE





LEGEND

- FUTURE RESIDENTIAL
- EXISTING RESIDENTIAL
- BUFFER
- WOODLOT
- ARTERIAL ROADS
- COLLECTOR ROADS
- MELROSE PROPERTIES
- SUBJECT LANDS
- SWM FACILITY

MELROSE INVESTMENTS INC.

**STORMWATER
MANAGEMENT PLAN**

TOWN OF BRADFORD
WEST GWILLIMBURY

PROJECT No. 20037

FIGURE No. 5

NOT TO SCALE



Table 1

Wastewater Flow Calculation

Project No. 20037

Town of Bradford West Gwillimbery Urban Expansion Area

Infiltration Rate: 0.2 l/ha/sec
 Generation Rate: 250 l/person/day

Estimated Development Discharge

Description	Units	Area (ha)	Pop. Density (p.p.u.)	Population	Ave Flow (L/s)	Harmon's Peaking Factor	Peak Flow (L/s)	Infiltration (L/s)	Total Flow (L/s)
Single / Semi	2975	140	3	8,925	25.82	3.00	77.57	28.00	105.57
Townhouses	5100	240	2.48	12,648	36.60	2.85	104.40	48.00	152.40
Apartments	425	20	2.1	893	2.58	3.83	9.89	4.00	13.89
Total	8500	400		22,466	65.00	2.60	191.86	80.00	271.86

TABLE 3



PRELIMINARY COST ESTIMATE
 MELROSE INVESTMENTS INC. PROPERTIES
 PROPOSED SETTLEMENT EXPANSION AREA
 THE TOWN OF BRADFORD WEST GWILLIMBURY

Project No. 20037
 Date : January 31st, 2023

Item No.	Servicing Item	Description	A		B		C = A x B	SUB-TOTAL COST (\$)
			Length	Meters	Cost per Meter (\$)	Total Cost (\$)		
1	SANITARY SEWER from Holland Street West to 6th Line 375mm (5 to 10m depths)	Includes 18 Mh's	1400	m	\$1,300	\$1,820,000		
2	SANITARY SEWER from Sixth Line to Pumping Station 375 mm (5m depth)	Includes 8 Mh's	650	m	\$825	\$536,000		
3	SANITARY FORCEMAIN from Pumping Station to 5th Line 200 mm (2.5m depth)	Includes connections to MH's	1200	m	\$620	\$744,000		
4	SANITARY SEWER ON 5TH LINE from Forcemain to Pumping Station Including Restoration 375 mm (5m depth)	Includes 14Mh's	1250	m	\$2,000	\$2,500,000		
5	SANITARY SEWER along Melbourne Drive from 6th Line to Pumping Station 375 mm (6m depth)	Includes 20Mh's	1800	m	\$1,000	\$1,800,000		
6	SANITARY FORCEMAIN ON CANAL ROAD from Pumping Station to Bradford WWTP Including Restoration 200 mm (2.5m depth)		6000	m	\$1,600	\$9,600,000	1 to 7 Inclusive	
7	HOLLAND RIVER SANITARY FORCEMAIN CROSSINGS Including Restorations		2	each	\$500,000	\$1,000,000		18,000,000.00
8	SANITARY PUMPING STATIONS	Includes connections to MH's	2	each	\$5,000,000	\$10,000,000		10,000,000.00
9	WATERMAINS 300mm within Internal Subdivision	Includes Valve & Boxes and Hydrants	12600	m	\$780	\$9,830,000	9 to 10 Inclusive	
10	WATERMAINS 300mm within 5th Line and 10th Sideroad Including Restorations	Includes Valve & Boxes and Hydrants	4000	m	\$1,793	\$7,170,000		17,000,000.00
11	SUB-TOTAL					\$45,000,000		\$45,000,000
12	PLUS 20% ENGINEERING & CONTINGENCIES					\$9,000,000		\$9,000,000
13	GRAND TOTAL					\$54,000,000		\$54,000,000

NOTES: