

February 3, 2023

472-23

Via Digital Upload

Attn: Honourable Steve Clark,
Minister of Municipal Affairs and Housing

c/o

Ms. Julianna Zhuo
Municipal Services Office – Central Ontario
777 Bay Street, 16th Floor
Toronto, ON M7A 2J3

**RE: Request to Facilitate Inclusion of Lands into Bradford West Gwillimbury’s Settlement Area Boundary
0052 9th Line and the Lands East to Highway 400, Bradford West Gwillimbury, Simcoe County, Ontario
ERO No. 019-6113**

UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) is the authorized planning consultant acting on behalf of 994958 Ontario Ltd. c/o Mr. Fabio Furlan, the registered owner of the subject lands municipally known as 0052 9th Line, Bradford West Gwillimbury, in the County of Simcoe.

On December 5th, 2022, the Ministry of Municipal Affairs and Housing (MMAH) initiated an invitation for public consultation on the proposed amendments to the County of Simcoe Official Plan via Official Plan Amendment No. 7 (OPA No. 7) – which sets out growth management policies to guide growth and development to the year 2051. The 60-day commenting period via ERO No. 019-6113 closes on February 3, 2023. The subject lands described below are well suited for future growth and intensification, as will be outlined throughout the remainder of this Letter. The purpose of this submission is to recommend specific changes to OPA No. 7 – namely, the inclusion of the subject lands within the ‘Strategic Settlement Employment Areas and Economic Employment Districts’ designation on Schedule 5.1 of the County of Simcoe Official Plan – so that it better aligns with the goals and objectives of the Province.

Site & Neighbourhood Context

For the purpose of this submission, the subject lands are comprised of 0052 9th Line and the lands east to Highway 400. The +/- 41.9 hectare (103.5 acre) site has frontage on 9th Line and borders the Highway 400 Employment Lands Secondary Plan boundary to the south, as outlined on Schedule B-2 of the Bradford West Gwillimbury Official Plan (Figure 1). It should be noted that this area is also designated as ‘Strategic Settlement Employment Areas and Economic Employment Districts’ on Schedule 5.1 – Land Use Designations of the County of Simcoe Official Plan (Figure 2) and is identified as the ‘Bradford West Gwillimbury Strategic Settlement Employment Area’ on Schedule 8 of the Growth Plan.

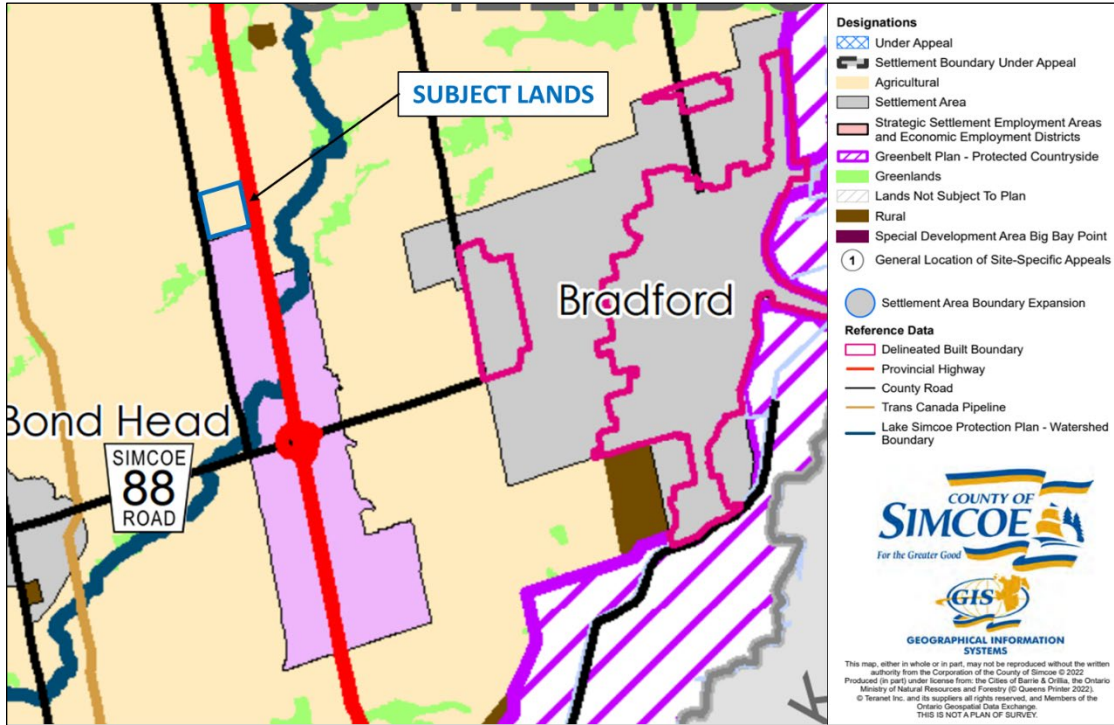


Figure 1 – Schedule 5.1 of the County of Simcoe Official Plan

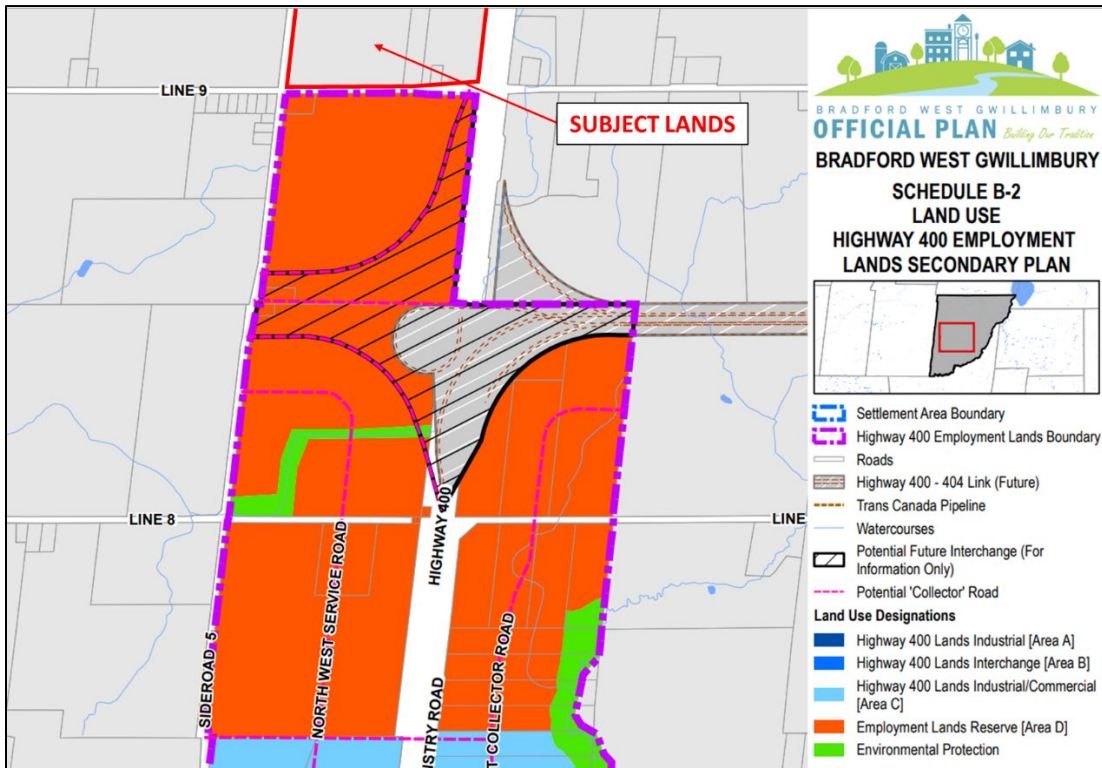


Figure 2 – Schedule B-2 of the Bradford West Gwillimbury Official Plan

A variety of land uses surround the subject property. To the north are predominantly vacant agricultural lands and single detached dwellings fronting public roadways. Approximately 300 metres east of the subject property is a Highway 400 overpass, beyond which is a mix of agricultural and low-density residential uses. To the south are vacant agricultural lands designated to accommodate future employment uses in the Bradford West Gwillimbury Official Plan and County of Simcoe Official Plan. To the southwest are 11 single detached dwellings fronting 9th Line and 5th Side Road, beyond which is a lumber storage yard owned and operated by Button Fence Ltd. Directly west of the subject property, opposite 5th Side Road is a large agricultural lot containing accessory agricultural structures and a single detached dwelling. It should also be noted that the subject property is located approximately 250 metres northwest of the proposed Highway 400-404 Connecting Link Interchange, as outlined on Schedule B-2 of the Bradford West Gwillimbury Official Plan.



Figure 3: Neighbourhood Context Map

Existing Planning Framework

Growth Plan for the Greater Golden Horseshoe

Being in Simcoe County, the subject lands are subject to the policies of the Growth Plan for the Greater Golden Horseshoe, wherein Schedule 3 of this Plan prescribes a population target of 555,000 people and 198,000 jobs for the County by 2051.

County of Simcoe Official Plan

The subject lands are designated 'Agricultural' on Schedule 5.1 – Land Use Designations of the County of Simcoe Official Plan.

Bradford West Gwillimbury Official Plan

The subject lands are designated 'Agricultural' on Schedule A – Rural Land Use Plan of the Bradford West Gwillimbury Official Plan (Office Consolidation August 1, 2010).

Town of Bradford West Gwillimbury Zoning By-law No. 2010-050

The subject lands are zoned Agricultural 'A' on Schedule A – Map #14 of the Town of Bradford West Gwillimbury Zoning By-law No 2010-050.

Planning Merit

OPA No. 7 proposes to increase the County-wide minimum designated greenfield area density target from 39 residents and jobs combined per hectare to 51 residents and jobs combined per hectare; to support the efficient use of land and establish minimum designated greenfield area density targets for local municipalities that have delineated built-up areas. Accordingly, Table E of OPA No. 7 prescribes a minimum density target of 55 residents and jobs combined per hectare for designated greenfield areas within Bradford West Gwillimbury.

As previously noted, the subject lands are also located directly northwest of the future Highway 400-404 Connecting Link interchange (Figure 4). Among other objectives, this proposed 16.2 kilometre, four-lane control access highway is intended to improve the movement of goods, grow and retain business investments, and create new employment job opportunities.

As such, it is our (UrbanSolutions') opinion that the subject lands represent an ideal location for future development with a range and mix of commercial and employment uses; which is to be facilitated through an expansion of Bradford West Gwillimbury's Strategic Settlement Employment Area and Economic Employment Districts designation.

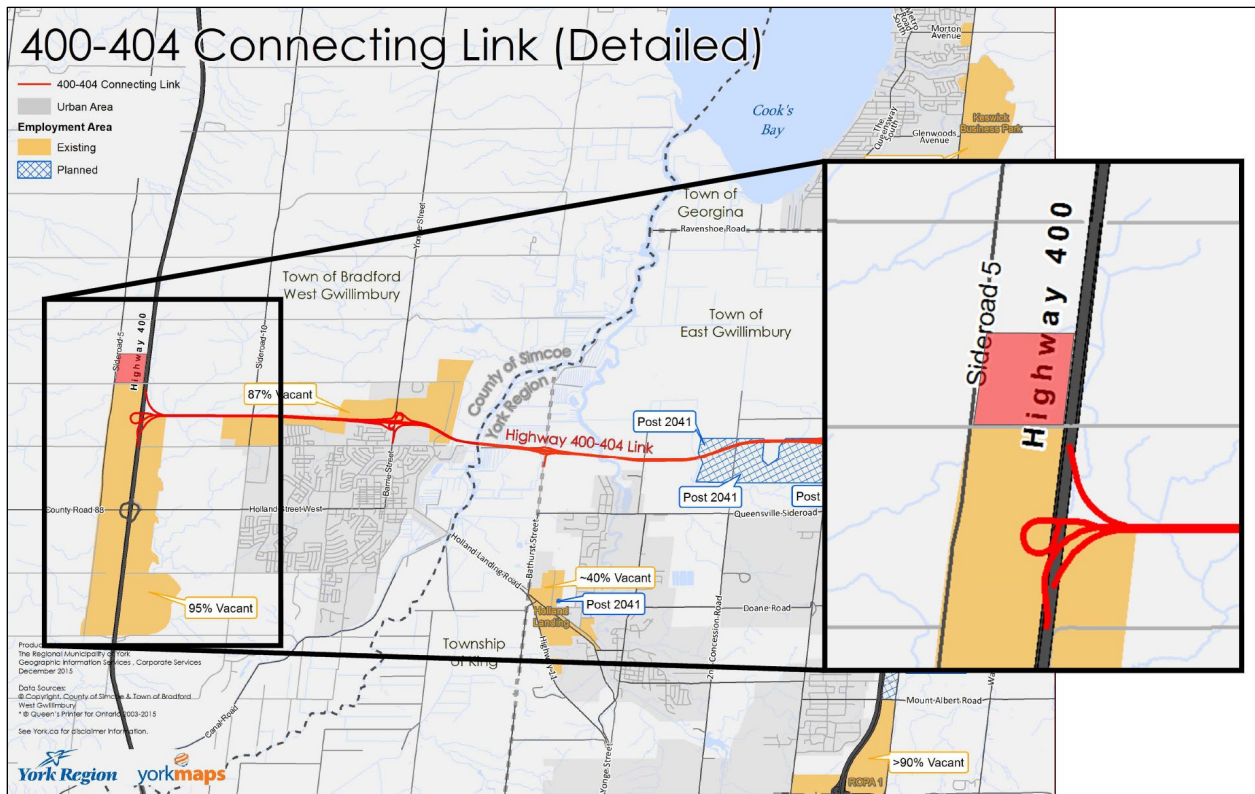


Figure 4 – Subject Lands in proximity to the Highway 400-404 Connecting Link

On January 19, 2012, the Province approved Amendment No. 1 (2012) to the Growth Plan, which introduced Section 6 – ‘Simcoe Sub-area’ in response to significant growth trends experienced throughout Simcoe County. Among other notable changes, this Amendment gave the Town of Bradford West Gwillimbury permission to direct appropriate employment to the ‘Bradford West Gwillimbury Strategic Settlement Employment Area’ – a Designated Greenfield Area identified on Schedule 8 of the Growth Plan which directly abuts the subject lands to the south (Figure 5).

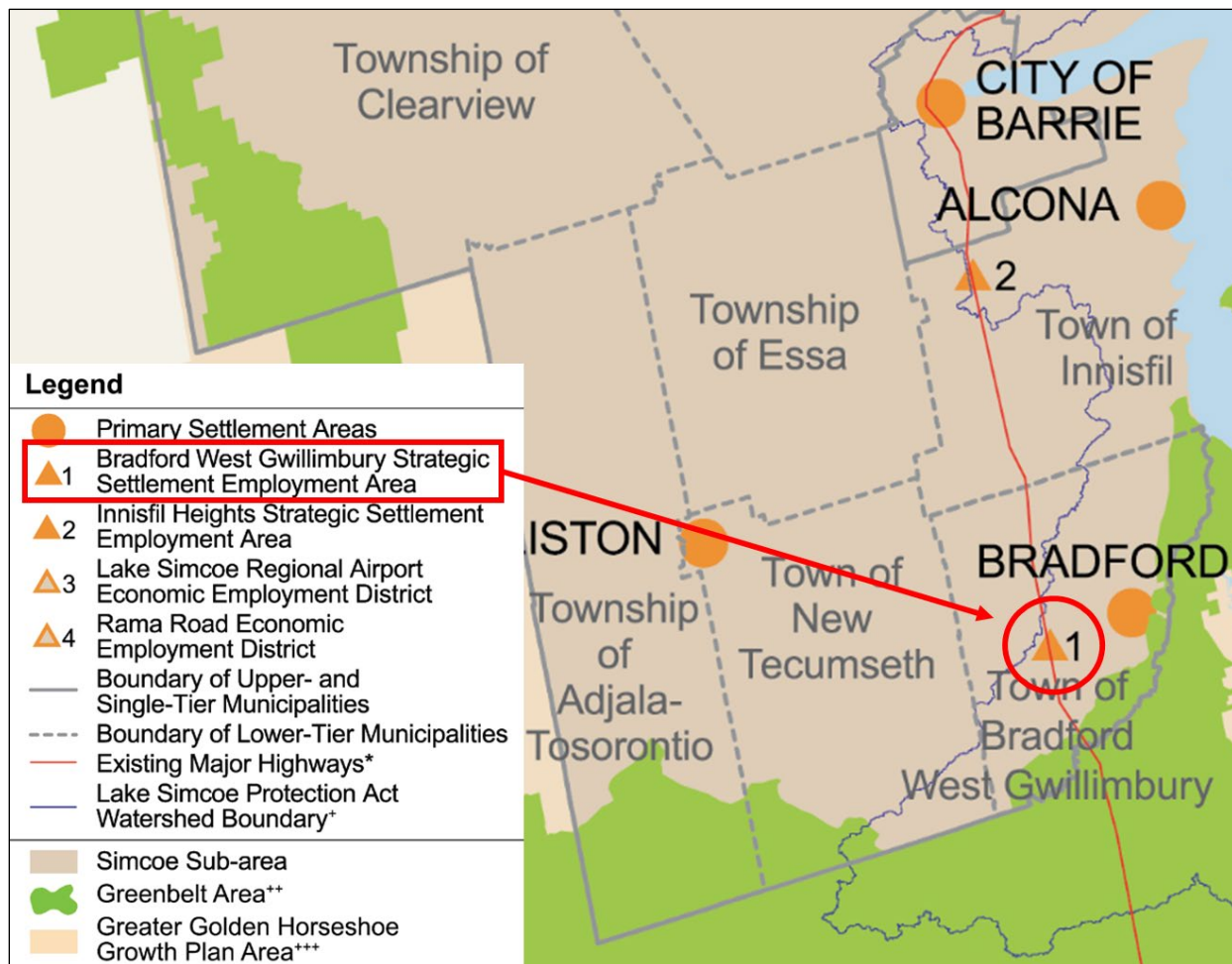


Figure 5: Growth Plan for the Greater Golden Horseshoe – Schedule 8 – Simcoe Sub-Area

In August 2020, the Ministry of Municipal Affairs and Housing (MMAH) approved Amendment No. 1 (2019) to the Growth Plan (2019), which included updated population and employment forecasts to the year 2051. These changes were based on the results of a market-based Land Needs Assessment (LNA) Methodology carried out by the Province, which established a population target of 555,000 and an employment target of 198,000 for the County of Simcoe by 2051. This Amendment also established a deadline of July 1, 2022, by which municipalities were required to update their Official Plans to ensure conformity with the updated Growth Plan (2020), and outlined the methodology to develop a Land Needs Assessment to advise growth allocations at the county/municipal level.

In response to these legislative changes, the County of Simcoe initiated its ongoing Municipal Comprehensive Review (MCR) to bring the Simcoe County Official Plan (SCOP) into conformity with the updated Growth Plan. Phase One – Growth Management (OPA No. 7) of the MCR was adopted by County of Simcoe Council on August 9, 2022 via By-law No. 6977 and is now before the MMAH for a decision. This Amendment evaluates the population and employment growth forecasted by the Province for the County, and further allocates this growth among each of its sixteen (16) local municipalities.

As outlined in Table B of OPA No. 7, the County has allocated approximately 20% of its total forecasted population growth to the town of Bradford West Gwillimbury, resulting in a total population of 83,470 by 2051. This represents a growth of 87.6% (38,980 people) over the 30-year time horizon, which is the second highest of the County's 16 municipalities (behind Innisfil). Similarly, Table C of OPA No. 7 allocates approximately 23.4% of the County's total forecasted employment growth to Bradford West Gwillimbury, resulting in a total of 19,090 jobs by 2051. This represents a growth of 161.6% (19,090 jobs) over the 30-year time horizon.

To determine how much additional Designated Greenfield Area land is required to accommodate the population and employment forecasts established in Sections 3.2.4 and 3.2.5 of OPA No. 7, the County retained Hemson Consulting Limited (Hemson) to conduct a Land Needs Assessment in accordance with the provincial framework outlined in the Growth Plan. The results of this Assessment are outlined in Table F of OPA No. 7 and identify the need for an additional 1,136.4 gross hectares of additional Designated Greenfield Area land for community uses (residential) and an additional 278.0 gross hectares for employment lands across the County. Of these totals, Table F allocates *all* 1,136.4 gross hectares of additional Designated Greenfield Area land required for community uses and only 75.2 hectares (27%) of required Employment Lands to the County's Southern Regional Market Area (which includes Bradford West Gwillimbury). At the municipal level, Table F allocates 449.1 hectares (39.5% of the County total) of additional land required for community uses and 0 hectares for employment lands to Bradford West Gwillimbury.

It is our (UrbanSolutions') standing that a higher proportion of additional Designated Greenfield Area land required for employment uses should be allocated to Bradford West Gwillimbury (and the Southern Regional Market as a whole) to reflect both current and projected future growth trends. As outlined in Hemson's Report dated March 31, 2022, approximately 63% of all population growth is forecasted to occur in within the Southern Regional Market, which will be largely driven by in-migration from the GTA. As such, the inclusion of the subject lands within Bradford West Gwillimbury's Strategic Settlement Employment Areas and Economic Employment Districts designation on Schedule 5.1 of OPA No. 7 would represent a natural extension of the existing boundary directly to the south, and support future employment growth associated with the planned Highway 400-404 Connecting Link.

Further, Section 3.2.2 of OPA No. 7 states that a significant portion of the expected population and employment growth forecasted to 2051 should be directed to local municipalities that contain Category 1 Settlement Areas (including Bradford West Gwillimbury). Accordingly, the Amendment proposes to increase the County-wide minimum intensification target from 32% to 35% and prescribes an intensification target of 42% for Bradford West Gwillimbury. As outlined in County Staff Report CCW 2022-235, this change supports infrastructure investments and is necessary to achieve the fundamental objectives of the Growth Plan which promote "complete communities" that are compact, pedestrian-oriented, and transit-supportive; as such are generally more efficient to service and rely less on the consumption of additional greenfield land to accommodate growth. The inclusion of the subject lands within the Strategic Settlement Employment Areas and Economic Employment Districts designation would provide additional opportunity to accommodate employment growth associated with this target and prevent the consumption of additional Designated Greenfield Area land that is less suited for future development.

Additionally, as the lands within the Strategic Settlement Employment Areas and Economic Employment Districts designation will need to be serviced with municipal water and sewer, expansion of this designation to include the subject lands would make more efficient use of this planned infrastructure.

ERO No. 019-6113 presents an opportunity to further revise the County of Simcoe's Official Plan by expanding Bradford West Gwillimbury's Strategic Settlement Employment Area to include the subject lands. While the County has plans to proceed with the next phase of its ongoing MCR once a decision is reached on OPA No. 7, such is anticipated to be a lengthy and prolonged process. Making this change now, through this ERO, will support the Province's goal of accommodating 198,000 jobs within the County by 2051.

In considering settlement area boundaries, Section 3.2.28 of OPA No. 7 establishes development criteria for additional Designated Greenfield Areas created through settlement area expansions. These include:

- i. The protection of natural heritage features and areas

Planning Comment: The Planning Act application processes will provide the appropriate control mechanisms to determine the site's ultimate developable limits in relation to any existing natural heritage features.

- ii. The promotion of coordinated, efficient and cost-effective infrastructure

Planning Comment: As previously noted, Bradford West Gwillimbury's Strategic Settlement Employment Area and Economic Employment District located directly south of the subject property will need to be developed with municipal water and sewer services to permit future development. Extending these services to the subject lands would represent a natural extension and make more efficient use of planned infrastructure. Such would also maximize opportunities for employment growth as a result of the significant investment in the Highway 400-404 Connecting Link project.

- iii. The promotion of fiscal responsibility

Planning Comment: Once developed, the subject lands will support the long-term economic prosperity of the Province by creating additional employment opportunities in close proximity to both existing and planned transportation infrastructure. Once developed, the lands will also contribute significantly more to the municipal tax base than the current underutilized parcel.

- iv. The development of compact, complete and healthy communities

Planning Comment: Bradford West Gwillimbury exhibits many elements of a complete community, including convenient access to an appropriate mix of jobs, local services, a full range of housing. As such, expanding the Bradford West Gwillimbury Strategic Settlement Employment Areas and Economic Employment Districts boundary to include the subject lands would provide further opportunities to make Bradford West Gwillimbury a complete community.

Further, Section 3.2.7(d) of OPA No. 7 outlines the following criteria for new development within a designated greenfield area:

- i. The proposed development will generally serve as a logical extension to the existing delineated built-up area or already developed designated greenfield areas, is compact and has a mix of uses to allow for the efficient use of land, infrastructure and public service facilities;

Planning Comment: The development of the subject lands with a range of employment uses would serve as a logical extension to the Bradford West Gwillimbury Strategic Settlement Employment Areas designation boundary to the south and create a new firm boundary to further preserve rural lands within the County that are less suited for urbanization.

- ii. The proposal will contribute to the availability of a range of housing choices (e.g. density, form, and price) in the designated greenfield area as a whole;

Planning Comment: N/A

- iii. All of the other infrastructure and public service facilities required to service the development is available or to be provided, with such infrastructure and public service facilities being used as efficiently as possible; and

Planning Comment: The proposed development of the subject lands will make more efficient use of planned infrastructure and public service facilities than the currently underutilized parcel.

- iv. Access is provided in a manner that supports the provision of essential emergency services, active transportation, efficient transportation patterns, and/or linkages with adjacent existing or planned development.

Planning Comment: As previously noted, the subject lands are in close proximity to an existing Highway 400 interchange and are located directly northwest of a future Highway 400-404 Connecting Link interchange. This will provide the site with direct access to neighbouring municipalities across the County and a variety of destinations throughout Ontario.

Planning Merit Conclusion

The need for additional Designated Greenfield Area lands throughout the County to accommodate both population and employment targets established in Schedule 3 of the Growth Plan (as well as the local targets established in Sections 3.2.4 and 3.2.5 of OPA No. 7) is well documented. Considering that the subject site directly borders Bradford West Gwillimbury's Strategic Settlement Employment Areas and Economic Employment Districts designation boundary directly to the south, that the site has direct access to the future Highway 400-404 Connecting Link, and that Bradford West Gwillimbury is identified as a Category 1 Settlement Area in OPA No. 7, it is our (UrbanSolutions') opinion that the subject lands represent an ideal location for future growth and development through the requested boundary expansion.

As requested, the inclusion of the +/- 41.9 hectare subject site will contribute to the identified need for 278 additional hectares of additional employment lands in Simcoe County.

Accordingly, the inclusion of the subject lands within Bradford West Gwillimbury's Strategic Settlement Employment Areas and Economic Employment Districts designation conforms to and implements both provincial and therefore, represents good land use planning.

Recommended Changes to the OPA No. 7 and the County of Simcoe Official Plan

Based on the above, UrbanSolutions recommends the following change to the County of Simcoe Official Plan:

1. To amend Schedule 5.1 – Land Use Designations of the County of Simcoe Official Plan to include the subject lands within the 'Strategic Settlement Employment Areas and Economic Employment Districts' designation, as shown on Appendix A.

Thank you for the opportunity to provide these comments. Please feel free to contact the undersigned to discuss the matter further.

Kind Regards,
UrbanSolutions



Matt Johnston, M.CIP, RPP
Principal

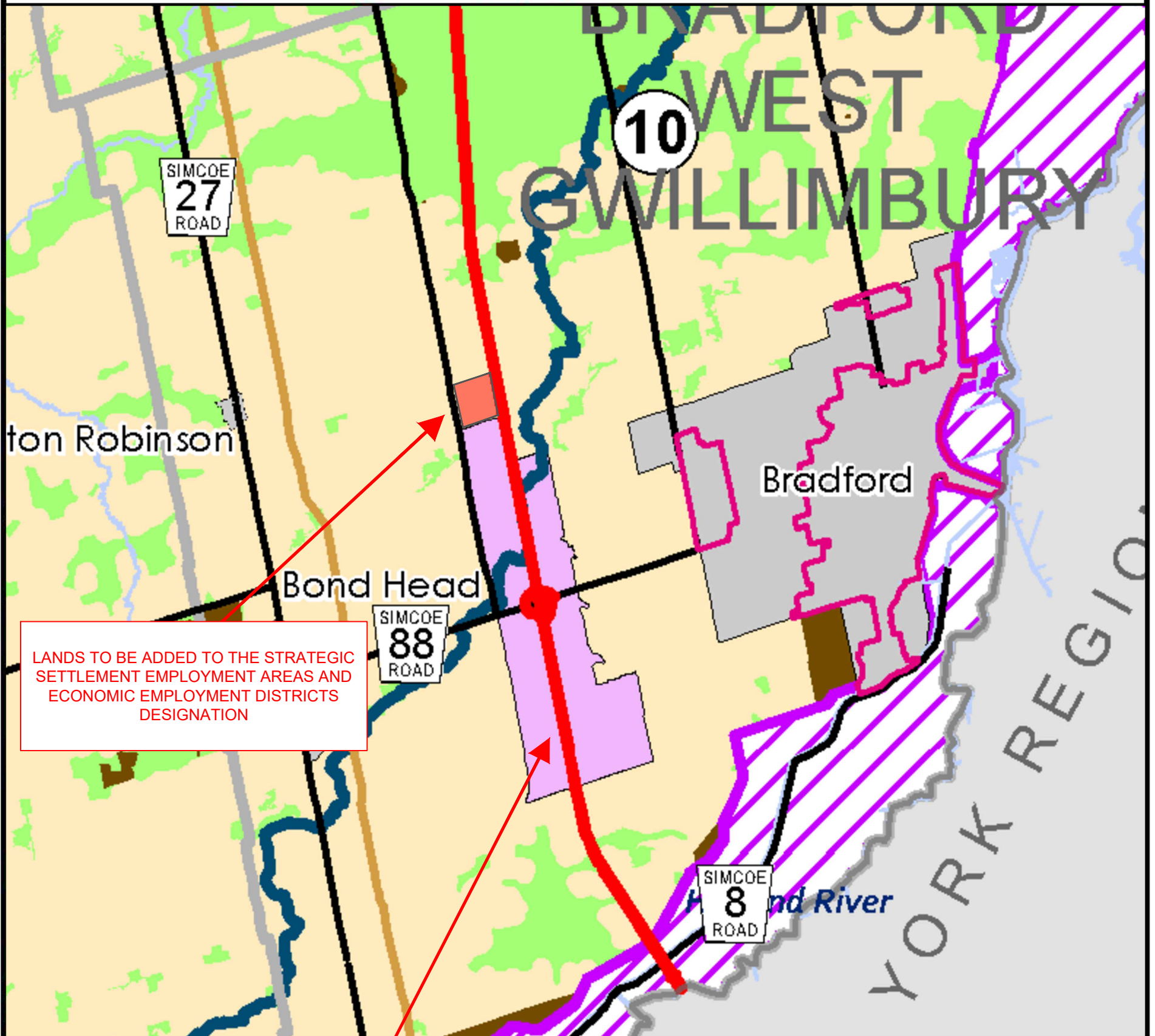


Matthew LeBlanc, M.PL, BA (Hons)
Planner

cc: 994958 Ontario Ltd. c/o Mr. Fabio Furlan (via email)

Appendix A – Schedule 5.1 of OPA No. 7
Proposed Changes to Schedule 5.1 – Land Use Designations

SCHEDULE 5.1 LAND USE DESIGNATIONS

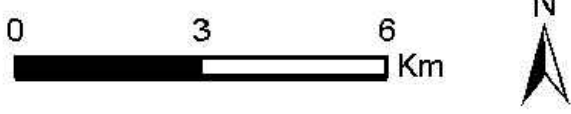


LANDS TO BE ADDED TO THE STRATEGIC SETTLEMENT EMPLOYMENT AREAS AND ECONOMIC EMPLOYMENT DISTRICTS DESIGNATION

Designations

- Under Appeal
- Settlement Boundary Under Appeal
- Agricultural
- Settlement Area
- Strategic Settlement Employment Areas and Economic Employment Districts
- Greenbelt Plan - Protected Countryside
- Greenlands
- Lands Not Subject To Plan
- Rural
- Special Development Area Big Bay Point
- General Location of Site-Specific Appeals

- ### Reference Data
- Settlement Area Boundary Expansion
 - Delineated Built Boundary
 - Provincial Highway
 - County Road
 - Trans Canada Pipeline
 - Lake Simcoe Protection Plan - Watershed Boundary



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