

November 1, 2024

MGP File: 15-2422

Town of Bradford West Gwillimbury
305 Barrie Street, Unit 2
Bradford, ON L3Z 2A9

via email: tdysart@townofbwg.com

**Attention: Thomas Dysart
Senior Planner**

Dear Mr. Dysart:

**RE: Ministerial Zoning Order (MZO) and Draft Plan of Subdivision Applications (File Nos.: D14-23-15 & D12-23-11)
Addendum to Planning Opinion Report dated October 2023 re Revised Development Concept and new Provincial Planning Statement, 2024**

Malone Given Parsons Ltd. (“MGP”) are the planning consultants for Bradford Highlands Joint Venture (“BHJV”), owners of 60 hectares (~148 acres) of land located between Fifth Line and Sixth Line and west of Simcoe Road in the Town of Bradford West Gwillimbury, municipally known as 23 Brownlee Drive and 2820, 2824 and 2848 Line 5 (the “Subject Lands”). On behalf of BHJV, MGP submitted applications for a Zoning By-law Amendment and Draft Plan of Subdivision on October 31, 2023. It should be noted that BHJV has a related Official Plan Amendment application (File No. D99-22-02) that is currently under review by the Town. Since this time, the Zoning Bylaw Amendment application has been superseded by a request for a Ministerial Zoning Order (MZO) that was provided to the Town on May 15, 2024.

We are submitting this planning opinion letter addendum in light of significant provincial policy changes that have occurred since our original development application submission. The introduction of the Provincial Planning Statement (PPS) 2024, which replaces the former Provincial Policy Statement 2020, along with the concurrent rescindment of the Growth Plan, represents a major shift in the policy landscape. This addendum provides a summary of these changes and addresses comments received from the Town, County, various agencies, and the public at the Statutory Public Meeting held on June 11, 2024, ensuring that our proposal remains aligned with updated provincial and municipal policy expectations.

1.0 Revised Draft Plan of Subdivision

The original Draft Plan of Subdivision, dated October 2023, proposed to develop the Subject Lands to accommodate 998 residential units consisting of 342 single detached units, 196 semi-detached units, 334 street townhouse units, and 126 back-to-back townhouse units, two park blocks, two stormwater management facilities, a compensation area and a natural heritage system.

The revised Draft Plan of Subdivision, dated October 2024, proposes to develop the Subject Lands to accommodate 962 residential units, consisting of 299 single detached units, 188 semi-detached units, 303 street townhouses, and 172 back-to-back townhouse units, two park blocks, an elementary school, one stormwater management facility, a compensation area, park/walkway trail blocks along the rear of the units adjacent to the existing estate residential lots, drainage blocks and a natural heritage system.

The proposed redevelopment has been revised to address the comments the consultant team received. We have been in extensive discussions with Town staff, working collaboratively to bring an appropriate development that can harmoniously integrate into the existing community. A summary of the major changes to the proposed redevelopment is below:

- Following comments from the school board, we have included a block intended to support a public elementary school;
- Following comments from the Town/public, the introduction of walkways/trails in certain areas where new residential lots abut existing larger residential lots to act as a transition/buffer, as well as enhance the connectivity throughout the neighbourhood
- Through further review of the engineering design, realignment of the stormwater management pond that also relocates it further north to remove it out of the Greenbelt lands. In addition, certain products were relocated and the road network was realigned to better accommodate the grading design
- Through discussions with Town staff, an additional connection point to Brownlee Drive was created to enhance connectivity with the existing residential community
- Through further review of the environmental features, additional areas have been protected (increased from 5.38ha to 8.78ha)
- As a result of all these changes, the unit yield was reduced by 36 units (998 to 962).

The proposed redevelopment offers a well-balanced mix of housing types, including single-family homes, semi-detached, and townhouses, providing diverse options to meet various housing needs. This approach supports a complete community with a range of uses such as residential, open space and recreational areas, and institutional facilities. We continue to believe that this plan integrates and is compatible with the existing community, promoting a vibrant, cohesive neighbourhood that enhances livability and supports the needs of current and future residents.

Figure 1 provides an illustration of the draft plan of subdivision, which will also be provided under separate cover.

Table 1 below delineates the land use statistics from the Draft Plan of Subdivision.

Land Use	Units	Area (ha)
Total Developable Area		50.84
Residential		28.34
<i>Single-Detached (11.6m) and Semi-detached (7.6m)</i>	299 (single-detached) 188 (semi-detached)	19.54
<i>Street Townhouses</i>	303	6.95
<i>Back-to-Back Townhouses</i>	172	1.85
Future Development		0.17
Parks		2.74
Elementary School		2.00
Storm Water Management Ponds		3.12
Drainage Blocks		0.95
Walkway Blocks		1.01
Public Roads		12.44
Future Road		0.07
Total Non-Developable Area		9.16
Environmental Protection Area		8.78
Compensation		0.38
TOTAL	962	60.00

The following table delineates the density calculations for the Proposed Development:

Table 1: Density of the Proposed Development

	Net Developable Area (ha) ⁴	Unit Yield ¹	Population Yield ²	Population-Related Employment ³	Total People & Jobs	Density
Neighbourhood Singles and Semis	19.54	487	1,729	52	1,781	
Street and Back-to-back Townhomes	8.80	475	1,325	40	1,365	
Total	50.84	962	3,054	92	3,146	58

Notes:

- 1) Unit yield based on Draft Plan of Subdivision, dated October 2024
- 2) Persons per unit for singles and rows (2022) was sourced from the County of Simcoe Land Needs Assessment prepared by Hemson
- 3) Population-related employment is calculated at 0.03 jobs per person based on 3% of the population that Worked From Home in 2016
- 4) Net developable area was calculated by removing NHS and Compensation Lands

2.0 Provincial Planning Statement, 2024

The Provincial Planning Statement, 2024 (“2024 PPS”) was issued under section 3 of the Planning Act and came into effect October 20, 2024. The 2024 PPS provides a streamlined

provincial wide planning document that replaces the Provincial Policy Statement, 2020 and A Place to Growth: Growth Plan for the Greater Golden Horseshoe, 2020 to provide for a simplified and integrated land use planning policy framework combining and updating elements from both the Provincial Policy Statement and Growth Plan. The Province also filed a regulation that revokes the Growth Plan, which came into effect on the same date.

The 2024 PPS, is a province-wide housing focused document, generally consisting of policies grouped under five pillars: generate increased housing supply, make land available for development, provide infrastructure to support development, balance housing with resources and implementation. It enables municipalities to plan for and support development and increase the housing supply across the province; align development with infrastructure to build a strong and competitive economy that is investment-ready; foster the long-term viability of rural areas; and protect agricultural lands, the environment, and public health and safety. All decisions shall be consistent with the 2024 PPS.

Section 1.1.1 of the 2020 PPS emphasized the importance of building strong, healthy, livable, and safe communities through the promotion of efficient development and land use patterns and accommodation of an appropriate range and mix of residential types, employment, institutional, recreation, and parks and open spaces to meet long-term needs. While this section no longer exists in the 2024 PPS, sections 2.1.6 and 2.2.1 continue to encourage the achievement of complete communities with an appropriate range and mix of land uses, housing options, transportation options, employment, public service facilities, recreation, and parks and open spaces to meet long-term needs.

Based on the in-force planning context, the Subject Lands are currently designated “Rural Lands” and “Greenbelt Plan” under the PPS, which are defined as lands outside the settlement boundary and outside of prime agricultural area. However for the purposes of this analysis, it is assumed that the Subject Lands will be brought into the Settlement Area Boundary through the Proposed OPA application which is intended to amend both the Simcoe OP and 2002 BWG OP (or through the concurrently submitted Ministerial Zoning Order). Following this, the Subject Lands will be considered a “Designated Growth Area” within the “Settlement Area” as defined by the PPS. As such, and for the purposes of this analysis, the proposed development of the Subject Lands are reviewed against the Designated Growth Area and Settlement Area policies.

2.1 Chapter 2: Building Homes, Sustaining Strong and Competitive Communities

The 2024 PPS states that settlement areas shall be the focus of growth and development (Section 2.3.1.1). Land use patterns within settlement areas shall be based on densities and a range of land uses which:

- *Efficiently use land and resources (2.3.1.2.a);*
- *Optimize existing and planned infrastructure and public service facilities (2.3.1.2.b);*
- *Support active transportation (2.3.1.2.c); and,*
- *Are transit-supportive, as appropriate (2.3.1.2.d).*

Furthermore, Section 2.3.1.3 provides that planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, which includes planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.

The proposed development makes efficient use of land by redeveloping a former golf course in a manner that is compatible with the existing surrounding community. The Subject Lands will be located within a Settlement Area and are in an appropriate location for residential uses that provides a similar type of housing that exists in the adjacent residential development surrounding the lands, which will optimize the existing and planned infrastructure in this area. To support the achievement of complete communities, proposed development will provide residential uses, parks, and an open space system, while preserving sensitive natural heritage areas.

Designated Growth Areas are defined as lands which are designated and available for residential growth in accordance with section 2.1.4.a). Section 2.4.1.a) states that in order to ensure that a range and mix of housing options and densities that are required to meet the projected population, planning authorities shall maintain the ability to accommodate residential growth for a minimum of 15 years within Designated Growth Areas. Planning authorities shall also maintain at all times land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans (Section 2.4.1.b). Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation (Section 2.2.1.c).

An appropriate range of housing options is provided in context with the surrounding development. The infill nature of the development allows it to optimize the public investments that have been made in existing servicing and community infrastructure to ensure the continued viability of public service facilities. The proposed development assists the Town in accommodating planned growth by providing housing to meet the projected needs of current and future residents.

2.2 Chapter 3: Infrastructure and Facilities

The PPS 2024 contains policies related to planning for infrastructure and public service facilities, to ensure that it will be provided in an efficient manner to accommodate the current and projected needs (Section 3.1.1). Section 3.6 of the 2024 PPS provides specific policy direction on sewage, water, and stormwater services, and maintains the general intent, purpose, and policy language as Section 1.6.6 of the 2020 PPS.

The policies in this section continue to encourage the efficient use and optimization of existing municipal sewage and water services (Section 3.6.1(a)), the provision of these services in a sustainable, feasible, and financially viable manner (Section 3.6.1(b)), and the integration of servicing and land use considerations at all stages of the planning process (Section 3.6.1(d)). As noted in the Functional Servicing and Stormwater Management Report prepared by SCS Consulting Ltd, the proposed development will use and extend the existing municipal services from the surrounding area to ensure that the Subject Lands are serviced in an efficient manner.

Section 3.9.1 of the 2024 PPS promotes healthy, active and inclusive communities by planning for a road network that facilitates community connectivity through active transportation and provides for a full range and equitable distribution of publicly-accessible built and natural settings for recreation, including parklands and open space areas. Public service facilities, such as schools, are encouraged to be co-located with parks and open space where appropriate to integrate the uses and facilitate a connected active transportation network (Section 3.1.4). The proposed development includes two parks, one of which is co-located, which will be connected through active transportation facilities within the proposed road network and through a series of trails proposed along the rear yards abutting the existing residential subdivision.

2.3 Chapter 4: Wise Use and Management of Resources

Section 4.1 of the 2024 PPS contains policies related to natural heritage features and requires their protection for the long term. The policies of Section 4.1 are similar to that of Section 2.1 of the 2020 PPS and as such, we are of the continued opinion as discussed in our Planning Opinion Report dated March 2024, that the Proposed Development is consistent with the natural heritage policies of the 2024 PPS.

Another main goal of the PPS is the long-term protection of natural heritage, water, agricultural, mineral, and other resources for their economic, environmental, and social benefit. The PPS prohibits development and site alterations within significant wetlands, significant woodlands, significant valleylands, significant wildlife habitat, significant Areas of Natural and Scientific Interest (ANSI's), and coastal wetlands unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions (Section 4.1.5). With respect to the Greenbelt Plan area, the PPS relies on the Greenbelt Plan to address area specific matters (Part 3). As detailed in the Environmental Impact Study prepared by Beacon Environmental, the proposed development is designed to respect the natural environment and to provide appropriate buffers to the natural heritage and hydrologically sensitive features which will be protected in Environmental Protection block.

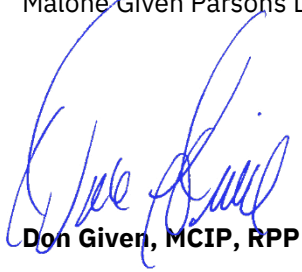
3.0 Conclusion

In relation to the policies applicable to the Proposed Development and the MZO and Draft Plan of Subdivision applications for the Subject Lands, the policies of the 2024 PPS are substantially the same as those in the 2020 PPS and it is our opinion that the Proposed

Development and the proposed amendments are consistent with the 2024 PPS. Additionally, changes in the draft plan have been made to address comments received

We trust that this addendum satisfies the Town in assessing the Proposed Development against the 2024 PPS. If you have any questions or concerns, please do not hesitate to contact the undersigned.

Yours very truly,
Malone Given Parsons Ltd.



Don Given, MCIP, RPP