

Ministry of Municipal Affairs and Housing  
17th Floor  
777 Bay Street  
Toronto, ON, M7A 2J3

June 23, 2023  
File 11128

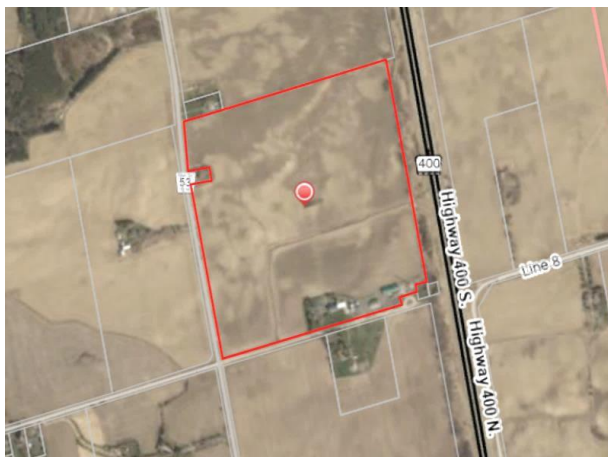
**Attn: Laurie Miller, Regional Director, Planning**

**Re: Request for revision to Bradford West Gwillimbury's Highway 400 Employment Lands Schedule  
3664 Line 8, Town of Bradford West Gwillimbury  
Part of Lot 6, Concession 8; being Parts 2 to 4 on Plan 51R-5781**

Weston Consulting is the authorized planning consultant for the legally registered owner of the properties known as 3664 Line 8 in the Town of Bradford West Gwillimbury (the “subject lands” and the “site”) and described in further detail below. This letter has been prepared to request revisions to A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan) with respect to the Provincial review of Highway 400 Employment Lands of the Bradford West Gwillimbury as it related to the subject lands.

### **Description of the Subject Lands**

The subject lands are located at the northeast corner of Sideroad 5 and the extension of Line 8, west of Highway 400. The majority of the subject property is vacant. Currently, on the southeast end are agricultural facilities and one residential dwelling. The subject property is surrounded by agricultural uses to the north and west, a residential dwelling to the south, and Highway 400 to the east. The property has an approximate area of 34.3 hectares (84.75 acres) and has an approximate frontage of 641.35 metres along Line 8 and 504.25 metres along the 5<sup>th</sup> Side Road.



*Figure 1: Aerial Photo*

### **Background**

A Pre-consultation meeting was held to facilitate an Industrial Plan of Subdivision that would feature seven blocks for employment uses on the subject lands. Following the meeting, staff and agencies' comments were received. Municipal staff indicated that revision to the Growth Plan for BWG's Highway 400 Employment Lands is required to facilitate this development. The 2021 Official Plan for the Town of Bradford West Gwillimbury, which has been adopted by the

Council and recently approved by the County of Simcoe, identifies the subject lands as Highway 400 Employment Lands “Area D”. Section 5.2.6 Part (a) indicates that limited expansions of those uses are permitted provided they do not compromise the long-term redevelopment of the lands for employment purposes.

## Planning Policy Review

The Town of Bradford West Gwillimbury (BWG) Official Plan designates the subject lands as *Lands Subject to Minister’s Zoning Order OPA 26 – Employment Lands Reserve [Area D]*. The site is designated as partially as *Environmental Protection*, and Area D of Bradford West Gwillimbury Strategic Settlement Employment Area, issued September 24, 2012, pursuant to 6.4.2 of the Growth Plan. Permitted uses within this designation are agricultural uses, agricultural-related uses and secondary uses, single dwelling, home occupations, and seasonal farm produce outlets. The Town of Bradford West Gwillimbury Zoning By-law 2010-050 zones the subject lands *Future Development “FD”* which permits uses legally existing on the effective date of the Zoning By-law. It should be noted that Ministry’s Zoning Order (OPA 26) was revoked on April 28, 2020. The objective of the revocation was to facilitate the implementation of the local zoning by-law. Consequently, the subject lands could be utilized efficiently and the mapping of the BWG Strategic Settlement Employment Area could be revised to better reflect the existing policy context of the new BWG Official Plan and Land Need Assessment findings. Additionally, the lands have frontages along arterial roads and are fairly flat, which makes the site a good candidate for employment use.

Policy 6.4.4 of the current Growth Plan states the Minister’s ability to review and amend decisions made pursuant to policies 6.4.2 and 6.4.3. Further policy 6.4.4 states that Municipalities in the Simcoe Sub-area may request the Minister to consider a review. As part of the subject lands’ application process (Official Plan Amendment, Zoning By-law Amendment, and Plan of Subdivision), Weston Consulting has formally requested the Town of Bradford West Gwillimbury to advise the Ministry to conduct a thorough review of the Bradford West Gwillimbury Strategic Settlement Employment Area policies. Staff confirmed that the Town Council stated their support to pursue revisions on August 2, 2022; however, the process hasn’t been initiated to determine the particulars of desired revisions.

County of Simcoe Growth Forecasts and Land Needs Assessment (County LNA Report) was released on March 31, 2022, as background research for the County of Simcoe’s Municipal Comprehensive Review by Hemson Consulting Ltd. Table 4 - Summary of Community Area Expansion Land Needs of this report indicates that BWG is required to have 502.6 hectares of the urban area to meet its forecast to 2051, however, Draft OPA (June 2022) only allocates 449.1 hectares for urban area expansion. The County LNA Report also identified an additional Employment Area land need of 500.9 developable hectares on a County-wide basis to accommodate long-term employment land employment growth to 2051. Permitting employment uses on the subject lands with an area of 34.3 hectares could assist the County to reach its targeted employment growth, through the re-designation of Reserved lands of Area D. From a review of the current Growth Plan policies for BWG’s employment lands, we are aware that the Growth Plan policies governing the Highway 400 employment lands in BWG are more complex and more restrictive than other similar Growth Plan policy directives.

Following the prior direction from Council and the above observations, Town has been developing a work plan to carry out a local growth management Official Plan update, which includes pursuing revisions to the Growth Plan to address the observations outlined above. The Town will proceed with its request for this revision, once the County of Simcoe Official Plan which is under appeal is fully approved by the Ministry of Municipal Affairs and Housing. The proposed development of the subject lands would need to be supported by an amendment to the Town’s 2023 Official Plan. The Town of BWG Council has recently endorsed a growth management update to the Town’s Official Plan to bring it into conformity with Simcoe County OPA No. 7 (SCOPA No. 7). SCOPA No. 7 was adopted by Regional Council in August 2022, and is now under review by Ministry for approval. SCOPA No. 7 involves multiple theme based OPAs as part of the first stage, including proposing amendments to the Highway 400 Employment Lands policies. Town’s

growth management of the Official Plan will be updated based on the SCOPA No. 7 approval by Province and the new/draft PPS which would replace the existing PPS and Growth Plan, as described below.

The Government of Ontario released the proposed Provincial Planning Statement 2023 (proposed PPS 2023), which integrates the Provincial Policy Statement 2020 (PPS 2020) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan) into a singular, province-wide policy document. We would like to request employment uses including industrial uses and accessory commercials, on the subject lands as a part of the PPS 2023 Plan. As noted above, this allows more efficient use of underutilized lands which have been reserved for Employment Lands. Section 2.8 of PPS 2023 encourages the intensification of employment uses and compact, mixed-use development that incorporates compatible employment uses such as office, retail, industrial, manufacturing, and warehousing, to support the achievement of complete communities.

The subject lands are not in the proximity of sensitive uses (the existing dwelling within the property is to be demolished as a part of the development) and support the intensification objective of the new PPS. Moreover, the owner intends to purchase the existing dwelling abutting the northwest of the subject property, municipally addressed as 3067 5th Side Road, and to include it as a part of the site. An interdisciplinary team of environmental specialists including ecologists and hydrogeologists was retained to assess the portion of the land which is within the Environmental Protection designation. A meander belt corridor has been identified within the property which will be protected, with an appropriate buffer as a part of the proposed development.

If you have any questions or concerns, please contact the undersigned at extension 335.

Yours truly,

**Weston Consulting**

Per:



Katie Pandey, MAES, MCIP, RPP  
Associate

C. Alan Wiebe, Manager of Community Planning, Town of Bradford West Gwillimbury