

Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch
777 Bay Street, 13th Floor
Toronto, ON
M7A 2J3

August 3, 2023
File 10631

**RE: Formal Comment Submission – Review of Proposed Policies Adapted from A Place to Grow and Provincial Policy Statement to form a new Provincial Planning Policy Instrument.
3329 8th Line and 2914 10th Sideroad
Town of Bradford West Gwillimbury**

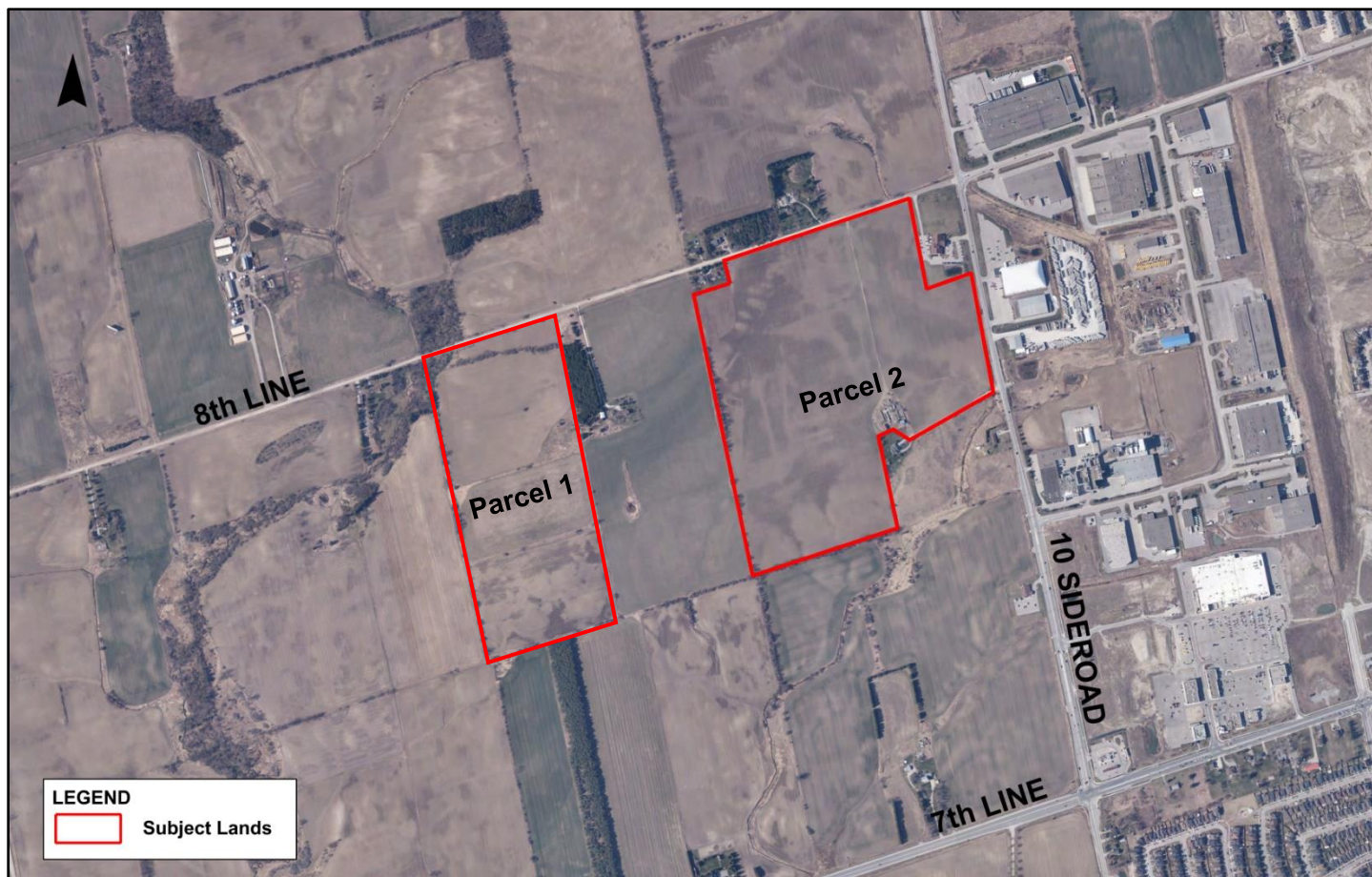
Weston Consulting has been retained by Anatolia Investments Corp., the owner of the lands located at 3329 8th Line and 2914 10th Sideroad in the Town of Bradford West Gwillimbury (herein referred to as the “subject lands”) to comment on the Province’s review of the A Place to Grow: Growth Plan for the Greater Golden Horseshoe (“Growth Plan”) and Provincial Policy Statement (“PPS”) to form a new Provincial Planning instrument. The purpose of this letter is to provide a formal submission as part of the Province’s commenting period in support of the proposed changes to the Settlement Area Boundary Expansion policies of the Proposed PPS.

A. Description of the Subject Lands and Site Context

The subject lands are located adjacent to the Bradford Settlement Area in the Town of Bradford West Gwillimbury (Figure 1). Parcel 1 is located at 3329 8th Line with a frontage of 303 metres along 8th Line with a total lot area of 20.8 hectares (51.4 acres), separated by two large parcels from the existing Settlement Area. Parcel 2 is located at 2914 10th Sideroad with a frontage of 420 metres along 8th Line and 265 metres along 10th Sideroad with a total lot area of 33.8 hectares (83.6 acres). A small portion of the Parcel 2 along 8th Line, is currently located within the Bradford Settlement Area. The subject lands currently accommodate agricultural buildings.

The surrounding area consists of a mix of land uses, as follows:

- **North:** The lands to the north consist mostly of cultivated cropland with accessory agricultural buildings, single detached dwellings on larger rural lots, a place of worship, and a six-storey residential retirement building at the southwest corner of 8th Line and 10th Sideroad, within the Bradford Settlement Area.
- **East:** To the east of Parcel 2 are industrial, commercial, and recreational uses, the Bradford Sports Dome and further east are single detached dwellings, all within the Bradford Settlement Area. To the east of Parcel 1 is cultivated cropland and further east Parcel 2.
- **South:** South of the subject lands consist of cultivated croplands with accessory agricultural buildings, and single detached dwellings on larger rural lots.
- **West:** The lands to the west consist of cultivated cropland with accessory agricultural buildings, and single detached dwellings on larger rural lots. Parcel 1 is located to the west of Parcel 2.



B. Province of Ontario’s New Proposed Provincial Planning Statement, 2023

On April 6, 2023, the province released *Bill 97, the Helping Homeowners, Protecting Tenants Act*. As part of this Bill, the province proposed a new Provincial Planning Statement (the “Proposed PPS”) which will combine and consolidate the current PPS and Growth Plan into a singular provincial land use planning document. On June 16, 2023, an update to the Proposed PPS was released to include definitions and Natural Heritage Policies.

The Proposed PPS is intended to consolidate existing policies to assist large and growing municipalities by providing policies that improve and streamline the construction of new housing. The six themes that the Provincial government received feedback on include residential land supply, attainable housing supply and mix, growth management, environmental and natural resources, community infrastructure, and streamlined planning framework. The elements of the PPS and Growth Plan have been consolidated by the Province into the following five pillars indicated in the Proposed PPS:

1. Generate an appropriate housing supply;
2. Make land available for development;
3. Provide infrastructure to support development;
4. Balance housing with resources; and,
5. Implementation.

The Ministry of Municipal Affairs and Housing (MMAH) is currently seeking input on the Proposed Provincial Policy Statement and intends to release the final set of policies for Fall 2023. The Proposed PPS identifies policies for Settlement Areas and Settlement Area Boundary Expansions. These policies include:

2.3 Settlement Areas and Settlement Area Boundary Expansions

2.3.4 In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities should consider the following:

- a) that there is sufficient capacity in existing or planned infrastructure and public service facilities;
- b) the applicable lands do not comprise specialty crop areas;
- c) the new or expanded settlement area complies with the minimum distance separation formulae;
- d) impacts on agricultural lands and operations which are adjacent or close to the settlement area are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and
- e) the new or expanded settlement area provides for the phased progression of urban development

We support the above policy which provides flexibility for the appropriate expansion of new or existing settlement areas. It is our opinion proposed policy 2.3.4 captures the necessary requirements to ensure a coordinated and strategic expansion of new or existing settlement areas. The current in-effect Provincial Policy Statement (2020) requires a comprehensive review be undertaken and a criterion to be satisfied (Policy 1.1.3.8), which reduces the ability for available land to be used for development. The proposed policies provide greater flexibility for ensuring more land is available for development.

The subject lands are appropriate to be utilized for residential development, and the Proposed PPS policies allow for the greater flexibility to expand the Bradford Settlement Area to include these lands.

C. Conclusion

It is our opinion the greater flexibility for settlement area expansions (new or existing) in the Proposed PPS allows for appropriate land to be utilized for development sooner than if a comprehensive review is required. The Proposed PPS policies recognize the importance of availability of infrastructure, protection of specialty crop areas, minimum distance separation, impacts to agricultural land and the phased progression of development which ensures the logical and appropriate expansion of settlement areas, without the need for a comprehensive review to be undertaken. We support the proposed Settlement Areas and Settlement Area Boundary Expansions policies of the Proposed PPS.

Thank you for the opportunity to provide comments on the Proposed PPS. If you have any questions regarding the above comments, please contact the undersigned.

Yours truly,

Weston Consulting

Per:



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Senior Planner

c. Josh Berry, Anatolia Investments Corp.