



Report of Development and Engineering Services

REPORT #: PLN-2024-5

DATE: 5-Mar-24

TO: Deputy Mayor and Members of Committee of the Whole

SUBJECT: **Town of BWG Official Plan Update – Growth Management to 2051 Interim Update on Simcoe County Official Plan Amendment No. 7 and Proposed Draft Provincial Policy Statement**

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1. RECOMMENDATIONS:

That Report PLN-2024-5 titled "Town of BWG Official Plan Update – Growth Management to 2051, Interim Update on Simcoe County Official Plan Amendment No.7 and Proposed Draft Provincial Policy Statement" be received for information; and

That Council direct staff to incorporate into the scope of Official Plan Growth Management Update to review and make recommendations on options to expand permissions and accelerate the development of the designated employment lands as a whole; and

That staff be directed to proceed with issuing a Request for Proposals for consulting services to assist in implementing the previously Council endorsed growth management work plan while continuing to apprise Council of any updates in relation to the Simcoe County Official Plan Amendment No. 7 and the draft Provincial Policy Statement proposed by the Province in 2023.

2. PREAMBLE:

Since the last update to Council on the Town's growth management work plan in February of 2023 (see [Report PLN-2023-2](#)), the Province has not yet issued decisions on the adopted Official Plan Amendment No. 7 to the Simcoe County's Official Plan ("SCOPA No. 7"). In accordance with the *Provincial Policy Statement (PPS, 2020)* and *A Place to Grow: Growth plan for the Greater Golden Horseshoe 2020 (Growth Plan)*, SCOPA No. 7 contains the County prescribed population and employment allocations along with other growth related policies for the Town to the year 2051. In April of 2023, the Ministry Municipal Affairs and Housing (MMAH) introduced a proposed Provincial Policy Statement (2023 PPS) that intends to revoke and replace the PPS (2020) and Growth Plan (2020) with a single policy document. As SCOPA No. 7 and the Town's growth management exercise would currently rely on policy direction from the Growth Plan, the approval of the 2023 PPS can have broad implications for the Town's growth management. To date the province has not issued a decision or further announcement on either policy matter.

The purpose of this report is to present Council with: 1) an overview of the endorsed growth management work plan; 2) a review of the modifications introduced by the 2023 PPS; and 3) an overview of the potential impacts of changing Provincial policies on the Town's growth management work plan, if approved. Given the limited time remaining within the current planning horizon (of 2031), and the potential changes between the existing and proposed policies, staff seek Council's direction to proceed with the previously endorsed work plan with recognition of how the policy framework may change after initiation of the project.

3. BASIC DATA PERTAINING TO THE MATTER:

3.1 – Background Policy and Context on Local Growth Management

The *Provincial Policy Statement* (2020) is issued under the *Planning Act* (1990) and is the primary provincial land use planning policy document, applying across Ontario. *A Place to Grow: Growth plan for the Greater Golden Horseshoe 2020* (Growth Plan) is a growth plan issued under the *Places to Grow Act, 2005*. Under the *Planning Act*, planning decisions shall be consistent with policy statements such as the PPS and shall conform with provincial plans like the Growth Plan. In 2020, the PPS underwent modifications that increased the time horizon for municipalities to ensure land availability to accommodate growth. In accordance with the PPS (2020), the Growth Plan (2020) was also amended to include new population and employment allocations and the extension of the planning horizon to 2051. These amendments resulted in the County of Simcoe, as an upper-tier municipality, being responsible to undertake a conformity exercise through a multi-phased municipal comprehensive review (MCR).

Phase 1 of the County MCR consisted of distribution of its assigned 555,000 people and 198,000 jobs by 2051 (per the new Schedule 3 of the Growth Plan) to each of its lower-tier municipalities along with assessment of their land needs to accommodate growth. This exercise resulted in the County's Council adopted Official Plan Amendment No. 7 (SCOPA No. 7) which set the following growth-related policies and direction for the Town:

1. Identifying the Bradford Urban Area as a "Primary Settlement Area".
2. Allocating post-2021 growth to the Town, through **to the year 2051**, of an *additional*:
 - a. ~40,000 people (**increase in population to 84,370**); and
 - b. ~19,000 jobs (**increase in jobs to 30,900**).
3. Estimating that BWG will require **up to an additional 449.1 hectares** of new **Designated Greenfield Area lands** to accommodate residential growth to 2051.
4. **Increasing BWG's intensification target** (i.e., annual percentage of new units constructed in the Delineated Built-Up Area) **from 40% to 42%**.
5. **Increasing BWG's Designated Greenfield Area ("DGA") density target** (calculated in the number of residents and jobs per hectare) **from 35 to 55**.
6. Conceptually mapping the Major Transit Station Area ("MTSA") around the Bradford GO Station, and **directing BWG to refine that conceptual boundary and undertake comprehensive planning for the MTSA**.
7. Inclusion of background material which recognized the demand for and absorption of employment lands within the Town, including along Highway 400, and which further noted that the Town's employment lands including the Highway 400 Reserve Lands "*will be required to accommodate part of the County's long-term employment growth to 2051.*" ([Hemson Memorandum, May 31, 2022](#)).
8. Requiring that lower-tier municipalities prepare phasing plans "*that establish a logical progression of growth, schedule and finance the infrastructure needed to support that ...*" (SCOPA No. 7, Part "A").
9. Require that lower-tier municipalities "*prepare sub-watershed plans or their equivalent when planning for the development of additional designated greenfield areas, to ensure that all elements of the natural heritage and water resource systems are considered...*" (SCOPA No. 7, Part "A").
10. Prescribing the process to be followed by lower-tier municipalities "*in identifying and assessing the merits of the future location of new designated greenfield areas*" (SCOPA No. 7, Part "A").

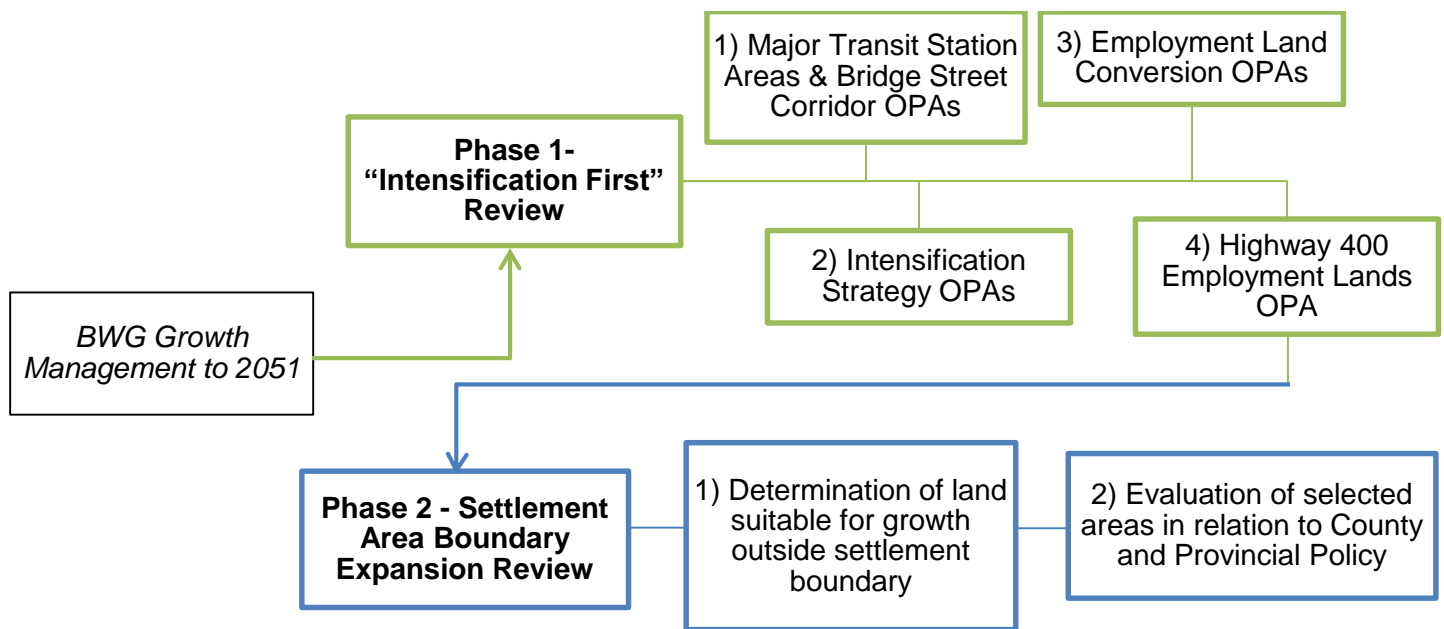
Phase 1 of the MCR was completed and implemented through the adoption of SCOPA No. 7 on August 9th, 2022. SCOPA No. 7 was then sent for approval to the Minister of Municipal Affairs and Housing (MMAH) as the County's approval authority. In October of 2022 the MMAH advised that they have suspended the 120 day limit to make a decision on SCOPA No. 7, opened Provincial consultations on SCOPA No. 7 from December of 2022 to February of 2023 (see [ERO No. 019-6113](#)) and, to date, have not issued a decision on the matter.

3.2 – Council Endorsed Work Plan for Growth Management to 2051

While awaiting a provincial decision on SCOPA No. 7, the County approved the Town of BWG’s new Official Plan (Town OP) in March of 2023. As the newly approved Town OP only plans for growth until 2031, in February of 2023, by way of Report PLN-2023-2, Council approved a work plan presented by Town Staff in order initiate the work necessary to plan for growth through to 2051 as established by the Province and in accordance with SCOPA No. 7. To complete this exercise, a number of amendments to the Town’s Official Plan (OP) are required, one or more new community plan areas may be needed, along with a number of studies and evaluations. The Council endorsed growth management review was in general accordance with the following work plan:

1. Phase 1 – To consist of 4 theme based amendments to the Town OP focused on accommodating growth within existing settlement and employment area boundaries, and estimated to take 12-18 months;
2. Phase 2 – Initiated following completion of Phase 1 and to focus on determining the specific area(s) adjacent to existing settlement area boundaries that are best suited to accommodate the remaining portion of growth to 2051 (also estimated to take 12-18 months).

Please see below demonstration of the Council endorsed-two phased work plan:



For greater detail on the above mentioned work plan for growth management to 2051, please refer to **Attachment 5.1 – Detailed Growth Management Work Plan** and or Staff Report PLN-2023-02.

3.3 – Proposed Provincial Policy Statement (2023 PPS)

As mentioned, per the requirements of the *Planning Act*, all planning decisions must be consistent with the Provincial Policy Statement (PPS), and all other provincial plans, like the Growth Plan, are to be read in conjunction with the PPS. While the PPS acts as a comprehensive planning policy document for the entirety of the province, the Growth Plan provides policy direction for managing growth in the regions experiencing the greatest development pressures (the GGH which includes BWG). The Growth Plan delineates growth areas, sets land density targets and forecasts in order to guide development and ensure sufficient investments in infrastructure and public facilities are made to accommodate rising demands. As a result, the PPS and Growth Plan are both foundational documents through which land use planning matters such as growth management, infrastructure planning, protection of natural resources and agricultural lands have been traditionally achieved.

On April 6, 2023, alongside the release of the 2023 Housing Supply Action Plan and a number of proposed legislative changes presented through *Bill 97, Helping Homebuyers, Protecting Tenants Act, 2023*, the MMAH introduced a draft Provincial Planning Statement (2023 PPS) intended to revoke the Growth Plan (2020) and replace the PPS (2020) by incorporating select policies from each into a single Provincial Policy document hereon referred to as 2023 PPS (please see posting [ERO#019-6813](#)). Through a separate document entitled [“Approach to Implementation of the proposed 2023 PPS”](#) also released at the same time, it was stated that the 2023 PPS was targeted to come into effect in the fall of 2023. This however did not occur and despite the closing of the consultation period in the summer of 2023, there has been no further updates or decisions issued on the matter by the MMAH.

3.4 – 2023 PPS Policy Impacts on Growth Management Work Plan

Although the draft 2023 PPS presents modifications to the implementation of growth management, it still continues to maintain much of the same principles and overarching policies incorporated within the Growth Plan and the PPS (2020). For this reason Staff believe that much of the previously identified tasks in the endorsed work plan continue to be of relevance if the 2023 PPS is approved. Therefore, as the Town awaits a decision on behalf of the province on SCOPA No. 7 and or the 2023 PPS, given the similarities and the limited time available for completion of the exercise, Staff recommend that the previously endorsed work plan be initiated at this time, with the recognition that the policy framework with which the Town’s growth management work must be consistent and conform may be subject to change during the lifespan of the project.

In order to demonstrate the continued applicability of the endorsed work plan, the below section contains an analysis of the impacts of the new policies in the 2023 PPS to the growth management work plan. The analysis is broken down into the following four themes:

1. Growth Forecasting
2. Employment Lands
3. Settlement Area Expansion
4. Infrastructure

The below section contains a description of the policy modification in relation to the themes mentioned above and its associated impact on the identified work scope.

1) Growth Forecasting

The draft 2023 PPS would remove growth targets (such as population or intensification targets etc.) previously set through the Growth Plan (2020) and SCOPA No. 7. The intention of the previously prescribed targets was to help direct regional growth and development while facilitating the coordination of resources and public infrastructure to limit urban sprawl. The removal of the specific targets in the 2023 PPS does not remove the general principle of the policies which is for growth to occur through a *“coordinated, integrated and comprehensive approach”* that has consideration for *“population, housing and employment projections”*, planning of infrastructure and which *“coordinate[s] these matters with adjacent planning authorities”* (please review section 6.2 of the 2023 PPS). The similarities in the policies being carried over makes the intensification work identified as part of Phase 1 to continue to be of relevance.

<i>Proposed 2023 PPS Policy Modification</i>	<i>Impact on Town Growth Management Work Plan</i>
Planning Horizon – Planning authorities are now required to designate land to accommodate growth for ‘at least’ 25 years whereas PPS 2020 has a planning horizon of ‘up to’ 25 year.	Since the Town Official Plan only contains policies to account for projected needs up to 2031, updates to ensure consistency of the OP with requirement to accommodate growth to the new planning horizon is still needed.
Forecasts and Allocations – Population and employment forecasts set for municipal and regional	In accordance with the Growth Plan, SCOPA No. 7 allocated BWG an additional 40,000 people and 19,000

authorities in the Growth Plan (2020) is eliminated in the 2023 PPS. Upper-tier municipalities are given the authority to allocate population, employment, and density targets to lower-tiers, without any further direction (section 6.2.7, 2023 PPS). In case of an upper-tier without planning responsibility (as may be the case for Simcoe County through Bill 23), the 2023 PPS directs that this exercise occur by the planning authority as part of the planning process and should coordinate these matters with adjacent planning authorities” (section 6.2.8, 2023 PPS).

jobs to accommodate by 2051. While these numbers would no longer be relevant per the 2023 PPS, Section 6.2.7 of the 2023 PPS still requires that municipalities:

- “a) identify and allocate population, housing and employment projections for lower-tier municipalities;*
- b) identify areas [for] growth and development...and establish applicable minimum density targets*
- c) identify minimum density targets for growth and development taking place in new or expanded settlement areas...”*

Therefore while the Town may no longer have the County mandated forecasts on which to rely as the basis upon which it implements amendments to its OP, the need for growth forecasts and establishment of minimum density targets as previously identified in the Town’s work plan continues to be of relevance. This is particularly demonstrated through the tasks in phase 1 which consist of exploration residential intensification opportunities and the establishment of minimum densities in applicable areas in order to accommodate growth. As a result, the commencement of the existing work plan could be impacted in the event the 2023 PPS is approved during the lifespan of the project.

Intensification - The previous intensification targets have been removed and the focus of intensification is limited to “Strategic Growth Areas”, which are only applicable to *large and fast-growing municipalities*, a newly proposed term that includes 29 municipalities designated as experiencing the highest growth pressures, none of which are located in Simcoe County.

In accordance with the Growth Plan (2020), SCOPA No. 7 set an intensification target of 42% for the built-up area in BWG. The first two sets of amendments in Phase 1 of the Town work plan are intended to introduce greater levels of intensification in proximity to the Bradford GO Station, within the Bradford Urban Area and Bond Head Settlement Area. Although the specific policies directing that intensification through prescribing values is removed, the 2023 PPS does state that “planning authorities should support general intensification and redevelopment to support the achievement of complete communities” (section 2.3.3), demonstrating that while the specifics of the level of intensification is removed, the overall intent to encourage intensification remains. This makes the tasks identified as part of the Intensification OPAs in phase 1 still relevant.

Built-Up Areas – The 2023 PPS removes the concept of ‘delineated built up areas’ which is where the Growth Plan directs intensification.

Although the concept of built-up areas is removed, settlement areas and major transit station areas are still included with policy stating that these locations are to be the “focus of growth and development” (section 2.3 & 2.4.2). Therefore task 1 of phase 1 on MTSA’s in the work plan is still relevant, albeit with modified planning boundaries.

Density- Section 2.2.7 of the Growth Plan set a minimum density target of 40 residents and jobs per hectare for greenfield areas in Simcoe County. In accordance with the Growth Plan, SCOPA No. 7 builds upon this target by setting a minimum density of 55 residents and jobs per hectare for designated greenfield areas in BWG. The Growth Plan also sets

Although previously set minimum density targets are removed, the 2023 PPS does direct that planning authorities delineate MTSA boundaries and establish minimum densities for them while ensuring multimodal access and infrastructure is provided (policies 2.4.2.4-6). Therefore similar to the above, much of the work in phase 1 of the Town’s work plan, particularly the first set of OPAs

a minimum density target of 150 residents and jobs for the BWG Major Transit Station Area (MTSA). The 2023 PPS does not carry over these minimum density targets except for *large and fast-growing municipalities* (which does not include BWG). For all other municipalities, the 2023 PPS states that they “...may plan for [MTSAs] on higher order transit corridors by delineating boundaries and establishing minimum density targets.” (2.4.2.4)

remains relevant. Additionally the 2023 PPS still allows municipalities to identify MTSAs and other areas for growth and establish minimum density targets as required. Therefore while specific policies directing growth as contained in the Growth Plan are removed, the general intent to encourage growth through the establishment of minimum density targets in appropriate areas such as transit station areas remains.

2) Employment Lands

The 2023 PPS has also modified former policies in relation to Employment Lands by incorporating a new and more restrictive definition for “area of employment”, introducing more flexible opportunity for employment area conversions and removing previous restrictions for employment areas on rural lands. The impact of these modifications on the Town’s growth management work plan is minimal in that the tasks previously identified continue to be needed even with the new modifications. The biggest impact of these revisions would be the need to evaluate additional amendments required within the employment policy section of the OP.

Proposed 2023 PPS Policy Modification	Impact on Town Growth Management Work Plan
<p>Employment Area Definition – The former definition for employment area has been modified to exclude institutional and commercial uses, including retail and office uses not associated with the primary uses. The revised definition is also expanded to include related “research and development” uses and warehouse uses “related to the movement of goods”.</p>	<p>The impacts of these new modifications results in an increase in the quantity of work identified for the employment lands amendments portion of phase 1 of the growth management work plan. In addition to the analyses and amendments identified through tasks 3 and 4 of phase 1, the Town will also need to return to the existing employment related policies in section 4.3 of the Official Plan and evaluate additional amendments needed, including incorporation of new policies or possible re-designation of formerly identified employment areas that contain office or retail uses not associated with the primary employment use in accordance with the new modified requirements and definition.</p>
<p>Employment Land Conversions – The 2023 PPS provides greater flexibility in employment land conversions as it no longer needs to occur as part of a municipal comprehensive review or an Official Plan review. Conversion is permitted on the following basis (section 2.8.2.4):</p> <ul style="list-style-type: none"> a) <i>there is..[a]..need for the removal and the land is not required for employment area uses over the long term;</i> b) <i>the proposed uses would not negatively impact the overall viability of the employment area by:</i> <ul style="list-style-type: none"> 1. <i>avoiding, or...minimizing...impacts to existing or planned employment area...and</i> 2. <i>maintaining access to major goods movement facilities and corridors;</i> c) <i>existing or planned infrastructure and public service facilities are available to accommodate the proposed uses.</i> 	<p>Therefore while the tasks identified within the employment lands related amendments in phase 1 of the growth management work plan, such as evaluation of the employment lands including opportunities for their protection and or conversion remains relevant and will continue to be needed despite these revisions, the scope of the work plan currently identified will need to expand to accommodate the modifications to employment lands policies introduced by the 2023 PPS in the event that it is approved.</p>

In addition to the potential for modifications to employment lands policies under the draft 2023 PPS and SCOPA No. 7, staff notes that, subject to Council’s consideration of the proposed Tertiary Plan for the North East Quadrant of the Highway 400 Employment Area (i.e., north of County Road 88 and south of Line 8), the policies for the Highway 400 Employment Area secondary plan may require or benefit from modifications and updates. For instance, such modifications could include but not be limited to refinements to the conceptual road network, boundaries of development limits, and introducing permissions to support developments of employment lands on interim private servicing. To that end, staff recommend that Council direct staff to incorporate into the scope

of the Official Plan Growth Management Update to review and make recommendations to expand permissions and accelerate development of the designated employment lands as a whole

3) Settlement Area Expansion

With the removal of municipal comprehensive reviews in the 2023 PPS, settlement area expansions are permitted to occur at any time as long as certain policy requirements are met. Phase 2 of the growth management work plan consists of exercises for the purposes of expansions to the Town’s settlement area boundary as part of the MCR and Official Plan review. Given that Phase 2 is not proposed to be initiated until after the adoption of the amendments in Phase 1, this delay provides sufficient time to determine the final policy direction from the province in relation to this theme. Despite this timing, with the exception of a few policies, the policy criteria for expansion in the 2023 PPS is the same policies carried over from the previous documents.

Proposed 2023 PPS Policy Modification	Impact on Town Growth Management Work Plan
<p>New and Expanding Settlement Areas- The Growth Plan required the completion of a Municipal Comprehensive Review (MCR) in order to evaluate potential settlement area expansions to support and accommodate growth forecasts at a regional level. The proposed 2023 PPS removes the MCR requirement, allowing municipalities to identify settlement area expansions on an ad hoc basis, as long as the following requirements are met (section 2.3.4):</p> <ul style="list-style-type: none"> <i>“a) that there is sufficient capacity in existing or planned infrastructure and public service facilities;</i> <i>b) the applicable lands do not comprise specialty crop areas;</i> <i>c) the new or expanded settlement area complies with the minimum distance separation formulae;</i> <i>d) impacts on agricultural lands and operations...close to the settlement area are avoided, or...minimized ...as determined through an agricultural impact assessment ...;</i> <i>e) the new or expanded settlement area provides for the phased progression of urban development”</i> 	<p>Previous policy directed that expansions to settlement boundaries occur through municipal comprehensive reviews which in the case of BWG were conducted through the County. As a result SCOPA No. 7 contains a number of criteria that require to be demonstrated in order to proceed with a settlement boundary expansion. While the number of requirements for expansion are reduced in the 2023 PPS, the new criteria established consists of select policies that have been carried over from the previous documents. Thus while the settlement boundary expansion policies within the 2023 PPS are less stringent, they still include much of the same set of policies identified as part of the previously endorsed growth management work plan, making it still relevant and applicable.</p>

4) Infrastructure

The Town’s growth management work plan includes consideration of infrastructure and servicing needs in coordination with the servicing studies to be undertaken by the Town’s Capital Division. In accordance with direction provided through provincial policies, servicing and infrastructure sequencing and land use planning need to be closely aligned. This need for alignment is also captured by the 2023 PPS through the carrying over of previous policies emphasizing the provision of sufficient infrastructure and public service facilities when expanding settlement area boundaries.

The elimination of population and employment forecasts, intensification targets, density targets, and the removal of growth oriented policies for regions outside *large and fast-growing municipalities* in the 2023 PPS could provide greater flexibility to align planning for infrastructure and services with land use planning in BWG and other Simcoe County municipalities. The previous targets and policies as set through the municipal comprehensive review exercise facilitated the process of identifying and coordinating resources for the Town’s long-term financial, technical and operational needs in order to maintain and deliver infrastructure and service expenditures such as transit, community services and emergency services.

Additional impacts of the 2023 PPS are anticipated to be considered and evaluated in the work contained within Master Servicing Plans (such as for storm water, wastewater, water and roads) as they play a key role in growth management exercises by assisting in identifying and planning for the provision of appropriate services based on the envisioned land uses and type of development. For instance, enhanced flexibility in converting

employment lands to residential uses in the 2023 PPS may present challenges in these types of studies as planning for the Town's servicing needs based on land use could become less predictable.

Despite these changes, given the similarities in the general intent of the policies carried forward in the 2023 PPS, the previously endorsed growth management work plan continues to appropriately identify the general tasks and amendments required in the event that the Growth Plan and PPS 2020 are replaced by the 2023 PPS. Staff submit that, given the limited time available for the completion of the Official Plan review and enabling development to continue to accommodate the Town's future growth needs beyond a 2031 horizon, time continues to be of the essence to advance the Town's growth management work plan with the recognition that staff will need to keep Council apprised of further changes to Provincial and County policies alongside what if any impact those policy changes will have on the growth management work plan.

4. EFFECT ON TOWN FINANCES:

As outlined in Report PLN-2023-3 from the first quarter of 2023, the currently-proposed growth management project would have a cumulative upset limit of \$585,000, comprised of funds previously allocated for projects which would individually contribute towards growth management-oriented decisions of Council.

5. ATTACHMENTS:

Attachment 5.1 – Detailed Work Plan