

File: P-3364

November 24, 2022

Minister Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street, Toronto, Ontario
M5G 2G2

submitted via the online portal on the website: <https://ero.ontario.ca/notice/019-6216>.

Re: Proposed Amendments to the Greenbelt Plan (Environmental Registry of Ontario Files ERO # 019-6216) and Proposed Amendments to the Greenbelt Area Boundary Regulation (Environmental Registry of Ontario Files ERO # 019-6217)
Our Client: Cold Creek Development Ltd.
Our Clients Lands: N/E Corner of Mount Hope Road (8th Line) and Columbia Way, Town of Caledon
Regional Municipality of Peel

KLM Planning Partners Inc. is the land use planning consultant representing Cold Creek Development Ltd. (the "Owners") who own a parcel of land consisting of approximately 22.49 hectares (55.57 acres) located on the east side of Mount Hope Road, north of Columbia Way, legally described as part of the west half of Lot 11, Concession 8 within the Town of Caledon, Regional Municipality of Peel (the "Subject Lands"). The location of the Subject Lands and areas located within the Greenbelt Area are shown on Attachment 1 to this letter.

This letter is to provide comments on the above noted Proposed Amendments to the Greenbelt Plan and Proposed Amendment to the to the Greenbelt Area Boundary Regulation, as it relates to Environmental Registry of Ontario Files #019- 6216 and #019-6217.

In general, we support the initiatives associated with the amendments that are aimed at removing lands from the edge of the Greenbelt Area that are serviced or adjacent to services that can be used to build housing in the short term to address the housing crisis. We are aware that pursuant to the Greenbelt Act, 2005 that to accommodate removal of lands from the Greenbelt Area that additional lands are required to be added such that the net area of the Greenbelt Area remains the same or is increased.

In addition to the lands proposed for removal as outlined in ERO 019-6217, we would respectfully request that the Province consider the removal of approximately 17.929 hectares (44.30 acres) of the Subject Lands which are within the Greenbelt Plan Area as a further strategic removal to accommodate future and near term housing to help address the housing supply crisis in Ontario. Attachment 2 is the Map depicting the location of the additional requested removal from the Protected Countryside designation within the Greenbelt Plan Area.

Proposed Concept Development Plan

The subject lands which are currently vacant represent a logical extension to the existing built up area of the Bolton community in the Town of Caledon located immediately to the south of Columbia Way, both east and west of Mount Hope Road.

Currently, approximately 4.561 hectares (11.27 acres) of the Subject Lands are within the existing Urban System of the Region of Peel Official Plan which was approved November 4, 2022. The removal of the additional 17.929 hectares (44.30 acres) of the Subject Lands from the Greenbelt Area would provide the opportunity for future near term residential development to extend to the northern boundary of the Subject Lands which coincides with the Urban System Boundary or the Regional Urban Boundary as established in the Region of Peel Official Plan which extends northward of the Subject Lands, east of Mount Hope Road which is illustrated on Attachment 1. This will allow for a rounding out of the urban boundary that is logical and can accommodate residential use while protecting the Core Areas of the Greenlands System as identified in the existing Region of Peel Official Plan on Schedule C-2 and shown on Attachment 3.

Based on the proposed Concept Development Plan attached to this letter as Attachment 4, the additional removal from the Greenbelt Area would accommodate an estimate of approximately 253 units from within the requested removal from the Greenbelt Area both north and south of the Valley, whereas the lands would accommodate approximately 122 units within the existing Urban System on the Subject Lands.

Our client has participated in the Bolton North Hill Landowners Group who advanced work for a portion of the lands including a draft Secondary Plan and Natural Heritage Study report and participated in the last two regional urban boundary expansions and associated Ontario Municipal Board and Ontario Land Tribunal Hearings, prior to the recent inclusion of a portion of the Subject lands within the Urban System. Cold Creek Developments Ltd. holds the only property that participated in the Bolton North Hill Landowners Group with lands in the Greenbelt Plan that meet the provincial criteria for removal from the Greenbelt Area as discussed below. Based on the Natural Heritage Study Report prepared by the Bolton North Hill Landowners Group, and subject to the protection of the Core Areas of the Greenlands System, as shown as Valley and Buffers on the Concept Development Plan, Attachment 4, the proposed land is appropriate to accommodate future and near term residential development.

Schaeffers Consulting Engineers has confirmed that existing water and sanitary services are in immediate proximity to the Subject Lands and the Concept Development Plan can be serviced via existing water and wastewater infrastructure from the adjacent existing subdivision to the south. The location of the existing watermain and sanitary sewers where connection can be made to extend the services are shown on Attachment 1. Schaeffers Consulting Engineers analysis confirms that there is sufficient capacity to support the proposed residential units south of the Valley via a connection on Mount Hope Road and therefore there is no servicing constraints for this area. Furthermore, the analysis confirms that the balance of the residential units north of the Valley can be serviced with upsizing or local sanitary capacity improvements. The removal of the Greenbelt Area from the Subject Lands for immediate residential use is appropriate as it relies on the efficient use of existing services. A copy of Memo #2: Water and Wastewater Servicing Analysis Cold Creek Developments dated November 18, 2022 and Memo #1: Water and Wastewater Servicing Capacity Review Cold Creek Development dated August 24, 2022 prepared by Schaeffers Consulting Engineers are found in Attachment 5. This also confirms that our client is prepared to front-end the servicing required to develop the Subject Lands.

Provincial Criteria for Strategic Removals

In reviewing the potential for a portion of the subject lands to be removed, I am of the opinion that the removal of the Greenbelt Area from the Subject Lands satisfies the criteria set out in the ERO 019-6216 under the heading “Strategic Removals” in all regards. This is further described below:

Greater than 1:1 offset must be achieved to ensure overall Greenbelt expansion

Currently, according to the ERO 019-6217, the government is proposing to remove or redesignate 15 areas of land totaling approximately 7,400 acres from the edge of the Greenbelt Area that are serviced or adjacent to services and will be used to build housing in the near term. MMAH previously consulted on adding 13 Urban River Valley (URV) areas to the Greenbelt in April 2022. The area of the proposed Paris Galt Moraine lands would be in addition to these URV areas, totaling 9,400 acres for an overall expansion to the Greenbelt of approximately 2000 acres. The additional removal of Greenbelt Area of 17.929 hectares (44.30 acres) as requested herein from the Subject Lands would result in a total of approximately 7,444.3 acres being considered for removal (assuming areas for removal remain as proposed and noted on the ERO) which would result in an overall expansion of the Greenbelt of 1955.7 acres. Therefore, based on the assumptions noted, a greater than 1:1 offset is achieved, and this criterion is satisfied.

The lands are adjacent to existing settlement areas

As noted above and shown on attachment 1 to this letter, the additional lands requested to be removed from the Greenbelt Area is adjacent to the existing Regional Urban Boundary within the Region of Peel Official Plan to the north, south and west and therefore forms a logical extension to settlement area.

The lands are adjacent to the edge of the Greenbelt area boundary

As noted above and shown on attachment 1 to this letter, the additional lands we request to be removed from the Greenbelt Area are located on the edge of the greenbelt area boundary.

The lands have the potential ability to be serviced in the near-term with local infrastructure upgrades to be entirely funded by proponents

As noted above and addressed in Attachment 5 to this letter, the additional lands we request to be removed from the Greenbelt Area are in immediate proximity to existing water and sanitary services which can be readily serviced through the connection to existing services for residential use south of the Valley and through feasible sanitary capacity improvements for the residential units north of the Valley, which our client is prepared to finance and front-end.

The lands proposed for removal have the characteristics that would enable housing to be built in the near-term

The lands can be serviced as noted above and homes can be built subject to the extension of local roads with access to the existing collector road network including Mount Hope Road and Columbia Way. In addition, subject to detailed subdivision design and zoning approval, it is anticipated that the existing natural heritage features can be protected in perpetuity with the associated development as this work has been partially advanced. In addition, it is anticipated that local parks can be provided as shown in the concept, if required and that the proposed residential use will rely on the existing community services from within the Bolton settlement area.

In addition, it should be noted that the historical use of the land has been agricultural field crops and residential and therefore it is not anticipated that environmental soil contamination will be encountered that would impact residential development approvals and associated timing. Lastly, archaeological assessments have been completed including mitigation in the form of salvage excavation and therefore, further archaeological concerns are not anticipated that could delay immediate residential development.

In summary, we appreciate the opportunity to provide comments regarding the proposed Amendments to the Greenbelt Plan and would ask that as part of these amendments that the

Greenbelt Area be removed from our clients lands as a further strategic removal to accommodate future and near term housing to help address the housing supply crisis.

Should you have any questions or concerns with respect to the foregoing, please do not hesitate to contact the undersigned.

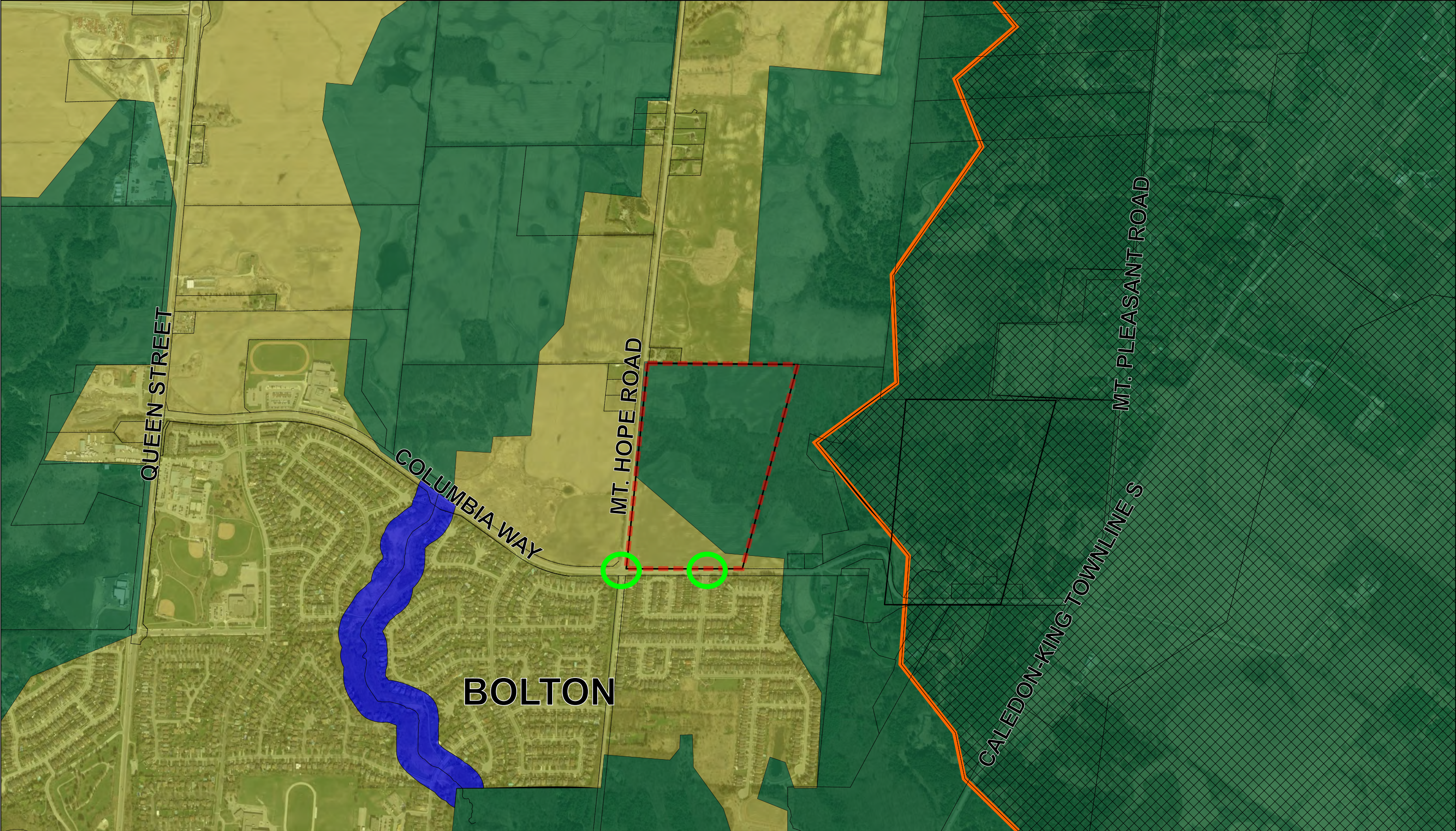
Yours truly,







KLM PLANNING PARTNERS INC.

A handwritten signature in blue ink, appearing to read 'M. Yarranton', with a large circular flourish at the end.

Mark Yarranton, BES, MCIP, RPP
Partner

Copy: Cold Creek Developments Ltd.



 SUBJECT LANDS	 GREENBELT AREA	 URBAN RIVER VALLEY	 CONNECTIONS TO EXISTING 300mm Dia. WATERMAIN and 250mm Dia. SANITARY SEWER
 URBAN SYSTEM (REGION of PEEL OP 2022)	 OAK RIDGES MORaine		