

December 2, 2022

Our File: 487-011

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

Attention: Hon. Steve Clark, Minister

RE: Proposed Amendments to the Greenbelt Plan
ERO: 019-6216
Old School Developments Inc., and One Old School
Developments Inc.
12602 and 12748 Chinguacousy Road
Town of Caledon

Glen Schnarr & Associates Inc. (GSAI) acts as the planner for Old School Developments Inc., and One Old School Developments Inc., owner of the lands municipally known as 12602 and 12748 Chinguacousy Road (herein referred to as “Subject Lands”), located within the Alloo Planning area in the Town of Caledon. The Subject Lands are located on the west side of Chinguacousy Road, south of Old School Road and currently represent two adjacent lots having a combined area of 39.48 hectares (97.55 acres).

For your background, the Alloo Planning area is generally bounded by Mayfield Road to the south, Chinguacousy Road to the east and the GTA West Preferred Route to the north and west. The Alloo area is adjacent to the existing Brampton Urban Area to the south, as well as the Mayfield West Phase 2 community directly to the east which is currently under construction. As part of the Region of Peel’s Growth Plan Conformity Municipal Comprehensive Review (MCR), and as reflected in the new Region of Peel Official Plan (as approved by the Province on November 4, 2022), the Alloo Secondary Planning area was brought into the Urban Area to accommodate growth to 2051 (see Context Plan on **Attachment 1**).

The northerly boundary of the Subject Lands abuts the Province’s Preferred GTA West Corridor Highway route. Furthermore, the Subject Lands are on the west side of Chinguacousy Road, where the Minister, in his decision of the Region of Peel MCR, redesignated the same environmental drainage feature on the east side of Chinguacousy Road from ‘Prime Agricultural’ to ‘Rural Land’ (see excerpt of the Minister’s Decision on **Attachment 2**). The Subject Lands are legally described as:

PT LT 21 CON 3 WHS CHINGUACOUSY AS IN RO877176 ; CALEDON; and,
PT LT 21 CON 3 WHS CHINGUACOUSY PART 1 & 2 , 43R2193 ; CALEDON

Province's Greenbelt Plan Review:

On November 4, 2022, the Ministry of Municipal Affairs and Housing announced proposed amendments to the Greenbelt Plan, in response to the More Homes Built Faster Plan. Considering the settlement area expansion in the vicinity of the Greenbelt, we wish to request the Ministry's re-evaluation of the Greenbelt Plan Area designation within the Subject Lands.

The Greenbelt through the Subject Lands were originally configured based on a broad-level desk-top assessment of natural heritage features using aerial photography. As a result, there are significant developable areas located inside the Greenbelt at this location which are not impacted by a defined Natural Heritage System (NHS) and provide no ecological benefit to key natural heritage features.

In our view, the expansive nature of the Greenbelt at this location contradicts the objectives of the Province's Growth Plan by unnecessarily reducing the amount of developable land located close to existing services and infrastructure. We suggest that the Greenbelt Plan Area within the Subject Lands encumbers the opportunity to use otherwise developable land within the Greenbelt for development as part of the settlement expansion area. Consequently, in our opinion, the Subject Lands are a prime candidate for Greenbelt Plan Area removal.

Our Proposed Changes to the Greenbelt Plan:

In support of this request, we enclose a Greenbelt Overlay Plan (**Attachment 3**) showing approximately 14.18 hectares (\pm 35.03 acres) of potentially developable areas within the Subject Lands which are subject to the Greenbelt and at present, represent actively managed agricultural fields. Based on the Region's Greenfield Density Target of 67.5 people and jobs per hectare for the Caledon area, the removal of the Greenbelt from the Subject Lands could accommodate an additional 957 people and jobs or approximately \pm 320 dwelling units (subject to final location of the GTA West).

The Greenbelt Act, 2005 sets out the legislated public process that applies to any proposed Greenbelt Plan amendments. This would include requiring consultation with affected public bodies such as the Greenbelt Council, municipalities and conservation authorities in the Greenbelt Area, an opportunity for consultation with the general public, as well as ensuring any proposed amendment does not reduce the total land area within the Greenbelt Plan. Engaging with Indigenous communities would also occur before any amendments are made. In the context of the Province's Greenbelt Plan Area removal criteria, we provide justification as follows:

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

Based on the Province's proposed Amendments to the Greenbelt Plan, which includes both additions and removals to the Greenbelt Plan Area, the Province is expected to achieve a net increase of approximately 2,000 acres. The requested removal of approximately 14.18 hectares of the Greenbelt Plan Area in this case is relatively insignificant and does not impact the ability to achieve a greater than 1:1 offset and continues to ensure an overall expansion to the Greenbelt.

2. The lands are adjacent to existing settlement areas and removed from environmental constraints

The area of the Greenbelt requested for removal is adjacent to the existing settlement area and in particular, adjacent to the Mayfield West Phase II community to the east which is currently under construction.

As well, the same environmental feature was deemed insignificant to warrant land use changes to 'Rural Land' in the Minister's recent decision on the Region of Peel MCR as shown on **Attachment 2**.

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

The Subject Lands are adjacent to the edge of the southern Greenbelt area boundary, as shown on **Attachment 3**.

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

The Subject Lands have the ability to be serviced in the near term as services are available in the area and will be extended as part of the urban expansion and extension of services to the Alloo area, funded by the developer.

As well, the removal of the Greenbelt from the Subject Lands would enable better community planning of the entirety of the Subject Lands that removes the encumbrances created by land fracturing through the Greenbelt affecting the Subject Lands.

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

The Subject Lands have recently been included into the Peel Region settlement area boundary and are situated within the Alloo Planning Area which is contiguous to the already built out communities in Brampton and the adjacent Mayfield West Phase 2 Secondary Plan which is currently under construction.

The Subject Lands have frontage directly on Chinguacousy Road, and if removed from the Greenbelt can accommodate additional housing, better utilizing the lands. With the current Greenbelt designation and considering the future GTA West alignment (Technically Preferred Route), a sliver of Greenbelt land is currently orphaned on the Subject Lands which is a poor utilization of land.

In accordance with the Province's planning framework, it is expected that the Town of Caledon will prioritize growth within lands which are adjacent to built-up areas. The advancement of community planning for this area will enable housing to be built on the Subject Lands in the near-term.

The Greenbelt on the Subject Lands does not meet Provincial criteria:

With respect to the Province's criteria for including lands within the Greenbelt Plan Area, we provide the following justification demonstrating how the lands that we request to be removed from the Greenbelt **do not** meet the criteria:

1. Protects against the loss and fragmentation of the agricultural land base and supports agriculture as the predominant land use

As shown on **Attachment 3** (Greenbelt Overlay Plan), the Greenbelt Plan Area in the vicinity of the Subject Lands is bisected by existing Chinguacousy Road and the GTA West Technically Preferred Route. This existing and future transportation infrastructure effectively isolate this area from other parts of the Greenbelt extending to the northwest and southeast.

Upon development of the surrounding settlement area and Highway 413, an irregular-shaped pocket of remnant agricultural lands would remain and would be surrounded on all sides by urban land uses and transportation infrastructure. As a result, the existing agricultural uses within the Greenbelt Plan will discontinue and the Greenbelt would sterilize good developable land in between the Greenbelt.

In our opinion, this land use configuration would serve no meaningful benefit to the overall Greenbelt or agricultural system and such remnant lands would be better served to accommodate urban lands uses for much needed housing. The lands requested to be removed from the Greenbelt are not conducive to supporting agricultural uses in the long term.

2. Gives permanent protection to the natural heritage and water resource systems that sustain ecological and human health and that form the environmental framework around which major urbanization in south-central Ontario will be organized

The lands requested to be removed from the Greenbelt Plan Area consist of temporarily managed agricultural operations which are adjacent to the Region's settlement area and are generally not required for the provision of natural heritage and water resource system protection.

Upon advancing the Secondary Plan planning process for the Alloo Planning Area, a Comprehensive Environmental Impact Study and Management Plan will be required by the governing Conservation Authority (TRCA) to determine appropriate measures to protect and enhance the existing natural heritage features as required to support adjacent urban development.

Components of the Subject Lands which may contain natural heritage and water resource features can continue to be protected for the long term by implementing appropriate buffers and setback requirements. Thus, the proposed removal from the Greenbelt Plan Area does not compromise the protection of adjacent natural heritage and water resource systems nor remove the need for a Comprehensive Environmental Impact Study.

3. Provides for a diverse range of economic and social activities associated with rural communities, agriculture, tourism, recreation, and resource uses

The lands requested to be removed from the Greenbelt Plan Area are adjacent to the Region's settlement area to the south and the GTA West preferred route to the north, which is intended for the accommodation of growth and will ultimately be developed with urban land uses. The lands requested to be removed from the Greenbelt are therefore not appropriate for the retention of agriculturally-oriented land uses in the long term.

4. Builds resilience to and mitigates climate change

The configuration of the Greenbelt Plan Area within and in the vicinity of the Subject Lands represent an isolated extension from the broader Greenbelt Plan Area. This portion of the Greenbelt Plan Area is enveloped by the Region's settlement area to the south and the GTA West preferred route to the north and provides little benefit to the mitigation of climate change.

Alternatively, the removal of the lands from the Greenbelt to allow for urban development can implement climate change mitigation measures through sustainable development practices by implementing efficient development patterns which avoid uneconomical expansion, implementing compact built form, and promoting densities which support active transportation such as walking and cycling, and promote the use of transit.

The location of these lands adjacent to the Highway 413 corridor and in particular, the future Highway 413 Transitway, serve as optimal lands for the location of intensified housing forms such as townhouse and apartment housing and possibly, affordable housing. The elimination of the Greenbelt designation on these lands would facilitate the implementation of key housing forms adjacent to major transit infrastructure and avoid development patterns which do not optimize Province's transit investment. Additional housing in areas to be serviced and close to transit, is needed to help address the housing crisis and contribute towards Provincial priorities for providing housing as outlined in proposed legislation, such as Bill 23.

5. Allows for critical new infrastructure and upgrades to existing infrastructure (subject to strong environmental conditions) to serve the substantial growth projected for the Greater Golden Horseshoe, to be permitted

Aside from the GTA West corridor, the lands requested to be removed from the Greenbelt Plan Area are unlikely to be required for critical infrastructure to serve growth within the Greater Golden Horseshoe. It is also not necessary to maintain the Greenbelt Plan Area within the Subject Lands to protect for critical infrastructure such as the GTA West Corridor since the protection of this corridor is afforded by way of the Province's permitting requirements and municipal policy restrictions.

The removal of the Greenbelt from the Subject Lands will also remove potential future public scrutiny that the Province's Preferred GTA West Corridor route falls within the Greenbelt.

Conclusion:

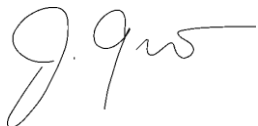
The removal of the Greenbelt designation in this area would further contribute to the creation of complete communities, defer the unnecessary extension of costly infrastructure to other areas, and make better use of existing and planned services and infrastructure already available within the area.

For the reasons above, we strongly encourage the Ministry to consider our request to remove the Greenbelt Plan designation from the Subject Lands. As part of the More Homes Built Faster Plan, the Provincial government has set a goal of having 1.5 million homes built over the next 10 years to address the current housing crisis. Amending the Greenbelt Plan to permit residential development where logical and efficient will facilitate responsible and targeted growth. The Subject Lands are in a prime location to achieve these goals.

We appreciate the opportunity to provide our comments herein. Please feel free to contact the undersigned if you have any questions or require any further information.

Sincerely,

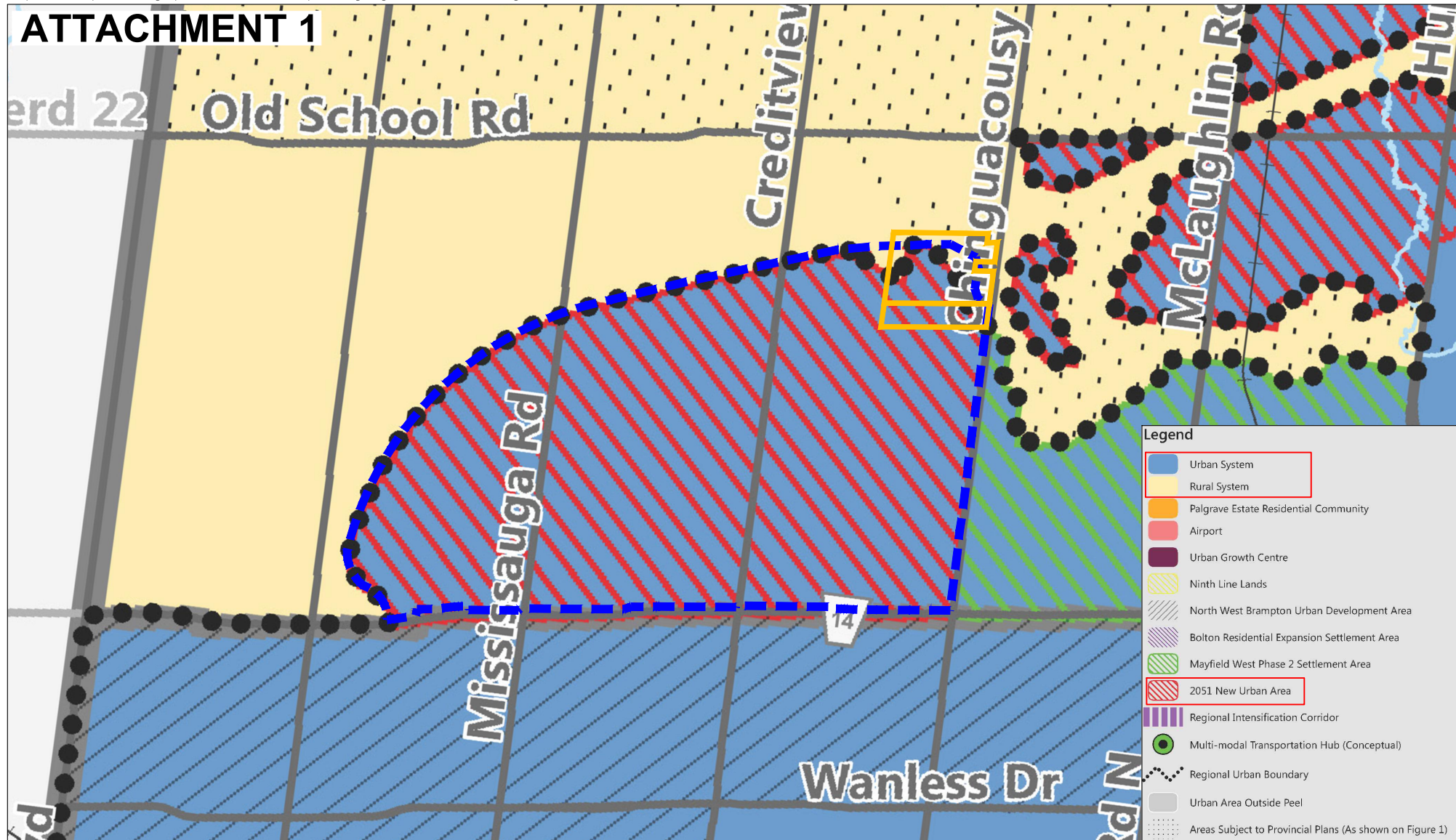
GLEN SCHNARR & ASSOCIATES INC.



Jason Afonso, MCIP, RPP
Partner

Encl.

- c. John Mantia, Old School Developments Inc., and One Old School Developments Inc.
Ram Nischal, Old School Developments Inc., and One Old School Developments Inc.



REGION OF PEEL OFFICIAL PLAN SCHEDULE E-1 - URBAN STRUCTURE (APRIL 2022)

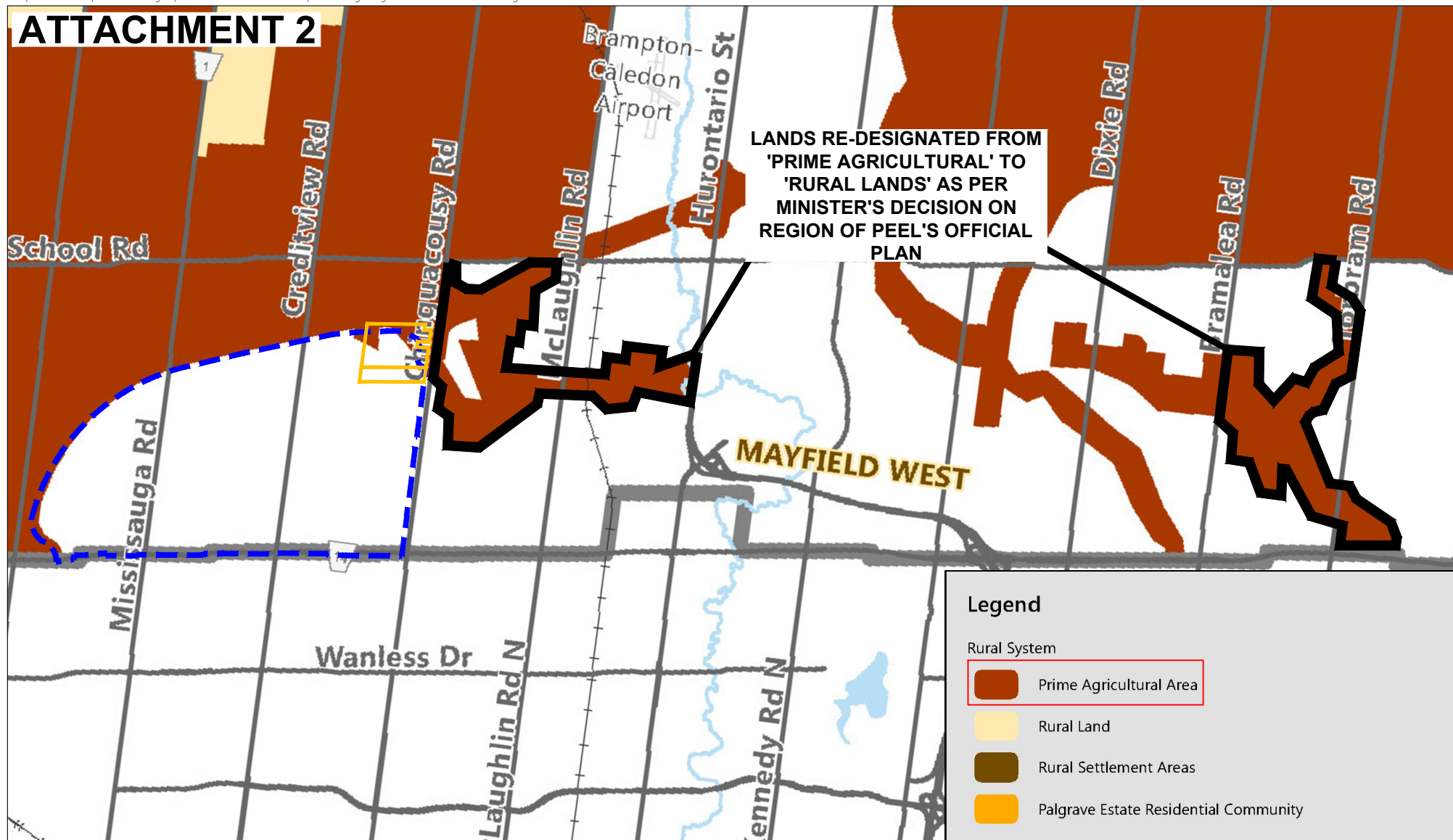
LEGEND

- SUBJECT LANDS
- ALLOA PLANNING BOUNDARY



SCALE: NTS
NOVEMBER 30, 2022

ATTACHMENT 2



REGION OF PEEL OFFICIAL PLAN SCHEDULE D-1 - RURAL SYSTEM (APRIL 2022)

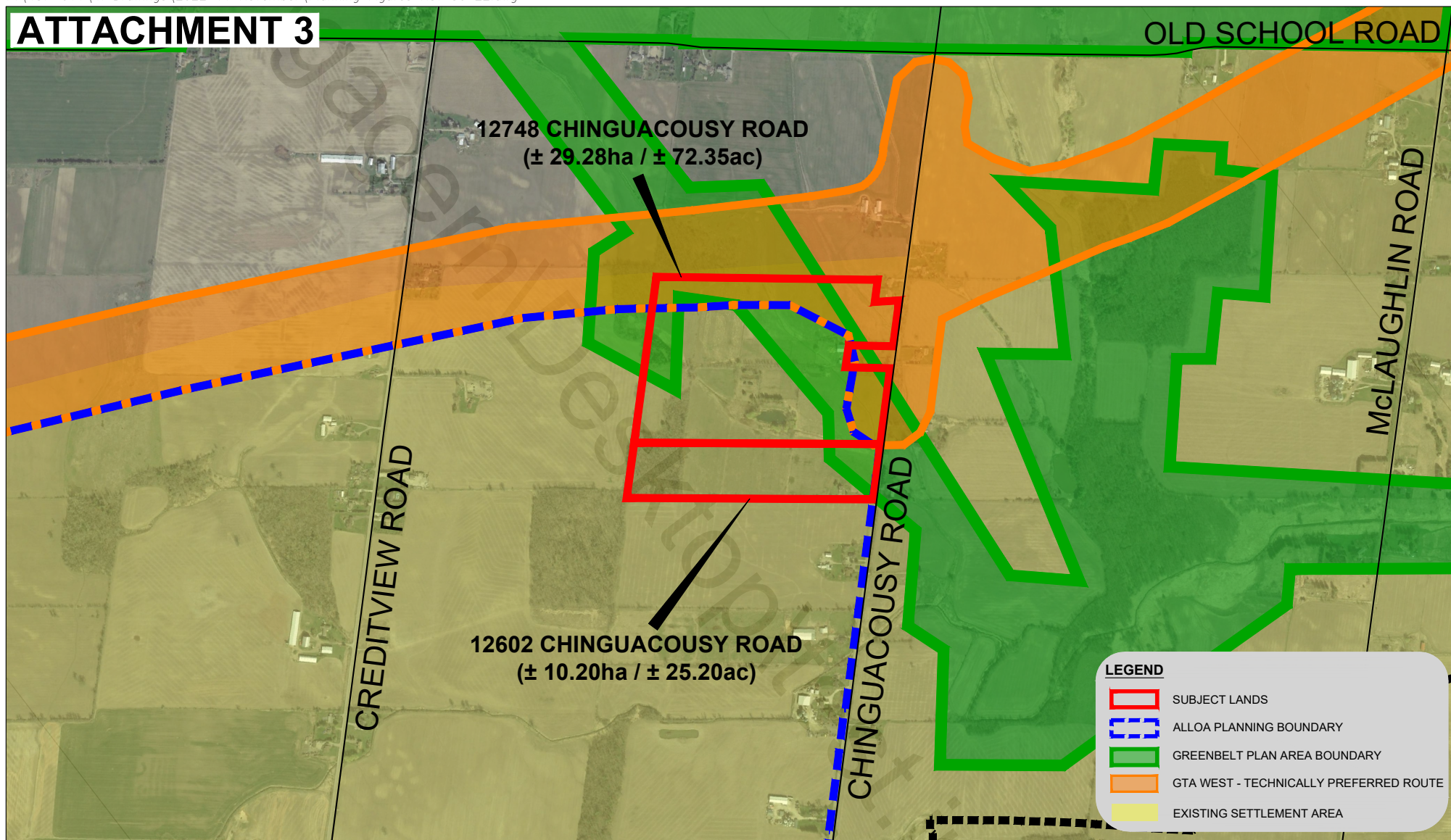
LEGEND

- SUBJECT LANDS
- ALLOA PLANNING BOUNDARY



SCALE: NTS
NOVEMBER 30, 2022

ATTACHMENT 3



GREENBELT OVERLAY PLAN

TOTAL GREENBELT AREA WITHIN SUBJECT LANDS: ± 14.18ha / ± 35.03ac



SCALE: NTS
NOVEMBER 30, 2022