

November 22, 2022

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

Attention: Hon. Steve Clark, Minister

Dear Mr. Minister;

**RE: Proposed Amendments to the Greenbelt Plan (ERO: 019-6216)
Request for Refinement to the Greenbelt Plan Area
FP Mayfield West (Caledon) Inc.
12529 Chinguacousy Road
Mayfield West Planning Area, Town of Caledon**

FP Mayfield West (Caledon) Inc. – a *Paradise Developments/Fieldgate Developments Joint Venture* company – is the owner of lands municipally known as 12529 Chinguacousy Road (subject lands), located within the Mayfield West Study Area in the Town of Caledon. See Context Plan on **Attachment 1**.

For your background, the Mayfield West Study Area represents a priority area to accommodate growth within the Town of Caledon. The Study Area is generally bounded by Chinguacousy Road to the west, Old School Road to the north, Dixie Road to the east and Mayfield Road to the south. With the Province's approval of the April 2022 Peel Region Official Plan on November 4, 2022, the Study Area is now entirely within the Region's Settlement Area boundary except for those lands within the Greenbelt.

With regard to the subject lands, the westerly portion is designated and zoned (by way of an MZO issued on July 10, 2020) for generally low- and medium-density residential uses as part of the Mayfield West Phase 2 Secondary Plan. See **Attachment 2** (Mayfield West Phase 2 Development Concept Plan). These lands are currently subject to a Draft Plan of Subdivision Application for a mix of detached and townhouse dwellings and is nearing Draft Plan Approval. The remaining lands are within the Greenbelt Plan Area or part of the new settlement area expansion and awaiting the Town's adoption of the updated Local Official Plan and initiation of the Mayfield West "Phase 3" Secondary Plan planning process to allow development approvals to proceed.

In light of the settlement area expansion surrounding the Greenbelt at this location, we wish to request the Ministry's re-evaluation of the configuration of the Greenbelt Plan Area within the subject lands. We understand that the Greenbelt delineation was based on a broad-level 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 recognizing the Provincial objectives for creating complete and compact communities, the expansive nature of the Greenbelt 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 current limit of the Greenbelt as shown on **Attachment 1** encumbers the opportunity to use otherwise developable tableland 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 refinement.

In support of this request, we enclose a Developable Area Plan (**Attachment 3**) showing approximately 15.83 hectares (\pm 40 acres) of viable developable areas within the current Greenbelt limits which, at present, represent actively managed agricultural fields and are outside of the existing natural heritage features.

In the context of the Province's Greenbelt Plan Area removal criteria, we provide justification as follows:

- **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 40 acres in this case represents a minor area, with significant potential to deliver housing. If it is included in the current initiative to better define and grow the Greenbelt, the proposed expansion will still deliver a ratio of Greenbelt expansion well in excess of 1:1, ensuring significant overall expansion of the Greenbelt.

- **The lands are adjacent to existing settlement areas**

The lands requested to be removed from the Greenbelt Plan Area are immediately adjacent to the existing Peel Region settlement area.

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

The lands requested to be removed from the Greenbelt Plan Area are located adjacent to 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**

The lands requested to be removed from the Greenbelt Plan Area are located adjacent to the Mayfield West Phase 2 Secondary Plan which is currently being developed with the full suite of urban services and community amenities including roads, transit services,

schools, parks, recreation centre, commercial uses, and water and wastewater services.

As the subject lands have recently been included in the settlement area boundary, it is expected that the Town of Caledon will prioritize the planning for this area given the availability and close proximity of existing services and community infrastructure. The advancement of community planning for this area will allow the lands to be serviced in the near-term.

- **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 in the Peel Region settlement area boundary as part of the Minister's approval of the Region's MCR OP on November 4, 2022 and represent lands which are contiguous to the Mayfield West Phase 2 Secondary Plan which is currently under construction. 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.

With regard to the Province's objectives for including lands within the Greenbelt Plan Area, we provide the following justification demonstrating how the subject lands do not meet such objectives:

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

The lands requested to be removed from the Greenbelt Plan Area are located within an irregular-shaped portion of the Greenbelt which is surrounded by the Region of Peel's settlement area to the north and south. Due to the past planning decisions and configuration of the settlement area, the lands in question already represent a fragmented parcel, and do not perform a meaningful function necessary to maintain the local agricultural system. The predominant approved planned use in the area is now urban, and as such, the lands no longer satisfy the criteria for inclusion in the Greenbelt.

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 actively managed agricultural lands which are adjacent to the Region's settlement area and are not required for the provision of natural heritage and water resource system protection.

Upon advancing the Mayfield West "Phase 3" Secondary Plan, 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.

As shown on **Attachment 3**, components of the subject lands which contain natural heritage and water resource features will 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.

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, and surrounded by, the Region's settlement area 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 rural oriented land uses in the long term. There are currently no economic or social activities taking place on the subject lands that are usually associated with rural communities such as tourism, recreation or resource uses – and, as such, the lands do not meet the criteria for inclusion in the Greenbelt.

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 and provides little benefit to the mitigation of climate change.

Alternatively, the removal of the lands from the Greenbelt 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.

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.

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. However, the long-term use of these lands may be appropriately determined through the Secondary Plan planning process and in this case, it is not necessary for lands to be located within the Greenbelt in order to accommodate critical infrastructure to support growth.

Based on the Region's Greenfield Density Target of 67.5 people and jobs per hectare for the Caledon area, the lands requested to be removed from the Greenbelt would accommodate at least an additional 1,069 people and jobs (or approximately 300 dwelling units).

These lands serve as an optimal location for new housing given its location adjacent to existing urban services and community amenities including water and wastewater services, roads, transit service, schools, parks, recreation centre, and commercial uses, all within the Mayfield West Phase 2 community. Further, the lands are relatively flat and can be easily and efficiently serviced and developed for housing. The adjacent natural heritage system also provides extensive passive recreational space with opportunities for multi-use trails which support healthy, active transportation such as walking and cycling.

Based on average development application processing timelines, a draft plan of subdivision could be approved by the Town within 8 to 12 months of filing a complete application. Detailed engineering review can also be undertaken by the Town prior to draft plan approval which can expedite the initiation of earthworks and site servicing such that they commence immediately after the issuance of draft approval and allow housing to be constructed the following year.

The removal of tableland not containing any natural heritage features from the Greenbelt within the subject lands 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 refine the limits of the Greenbelt Plan on the subject lands to remove tableland areas containing no natural heritage features and which do not contribute to the broader objectives of the Greenbelt Plan.

We appreciate the opportunity to make or request, herein and thank you in advance for your consideration. Please feel free to contact the undersigned if you have any questions or require any further information.

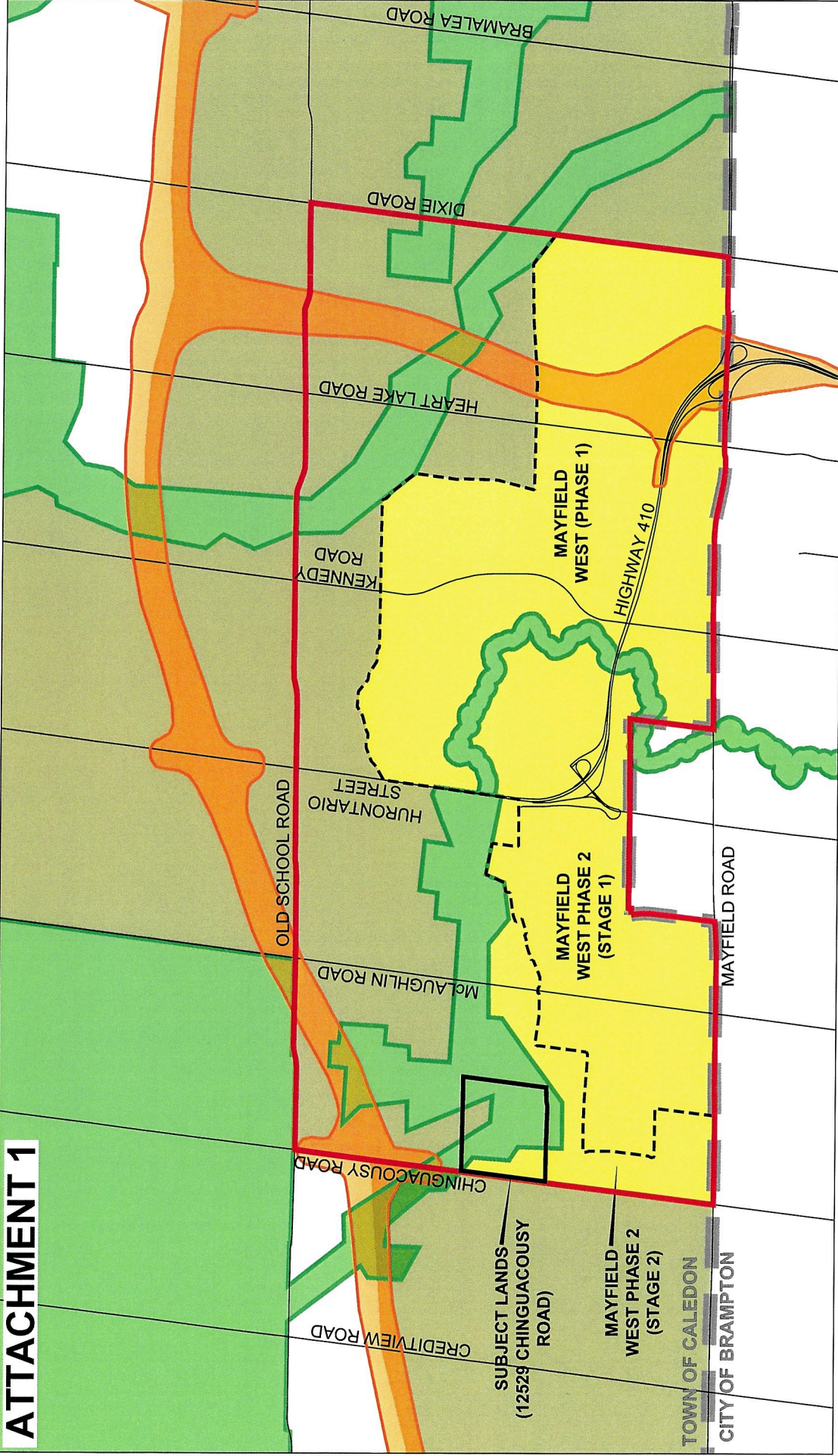
Sincerely,
FP MAYFIELD WEST (CALEDON) INC.


Mark Jepp, MCIP, RPP
Vice-President, Land Development

encl.








- c. Ryan Amato, Chief of Staff, Minister's Office, MMAH
Kirstin Jensen, Senior Policy Advisor, Minister's Office, MMAH
Steve Weisz, Paradise Developments
Jack Eisenberger, Fieldgate Developments

ATTACHMENT 1



MAYFIELD WEST STUDY AREA CONTEXT PLAN

LEGEND

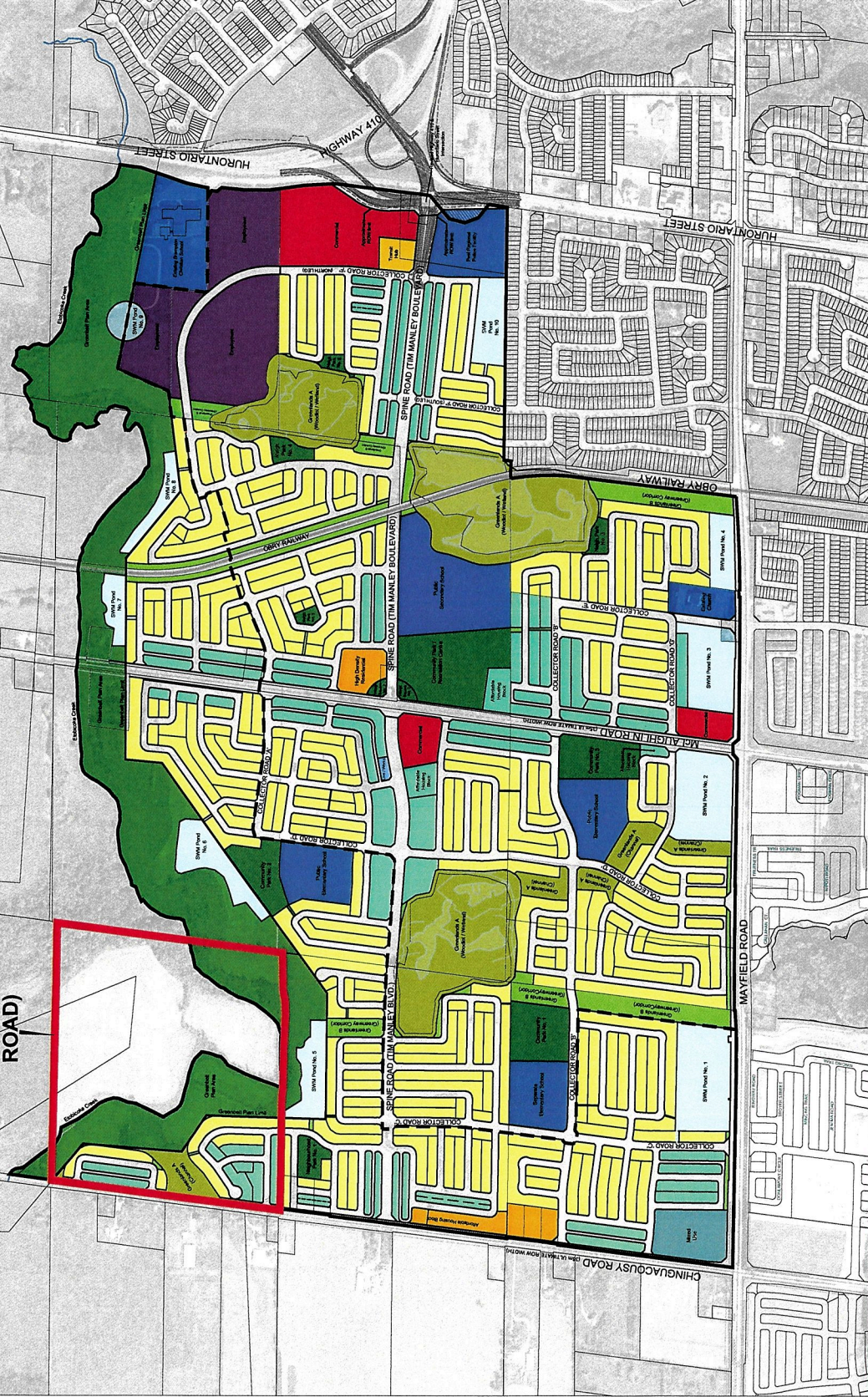
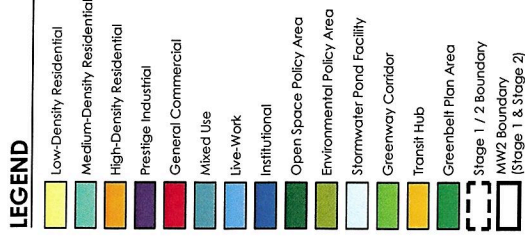
-  TOWN OF CALEDON BOUNDARY
-  MAYFIELD STUDY AREA
-  GREENBELT PLAN AREA BOUNDARY
-  GTA WEST - TECHNICALLY PREFERRED ROUTE
-  MAYFIELD WEST SECONDARY PLAN AREA
-  EXISTING SETTLEMENT AREA
-  APPROVED SETTLEMENT EXPANSION AREA



SCALE 1:40,000
NOVEMBER 1, 2022

ATTACHMENT 2

**SUBJECT LANDS
(12529
CHINGUACOUSY
ROAD)**



MAYFIELD WEST PHASE 2: PROPOSED STAGES 1 & 2 DEVELOPMENT CONCEPT PLAN

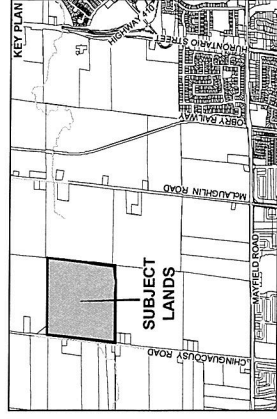
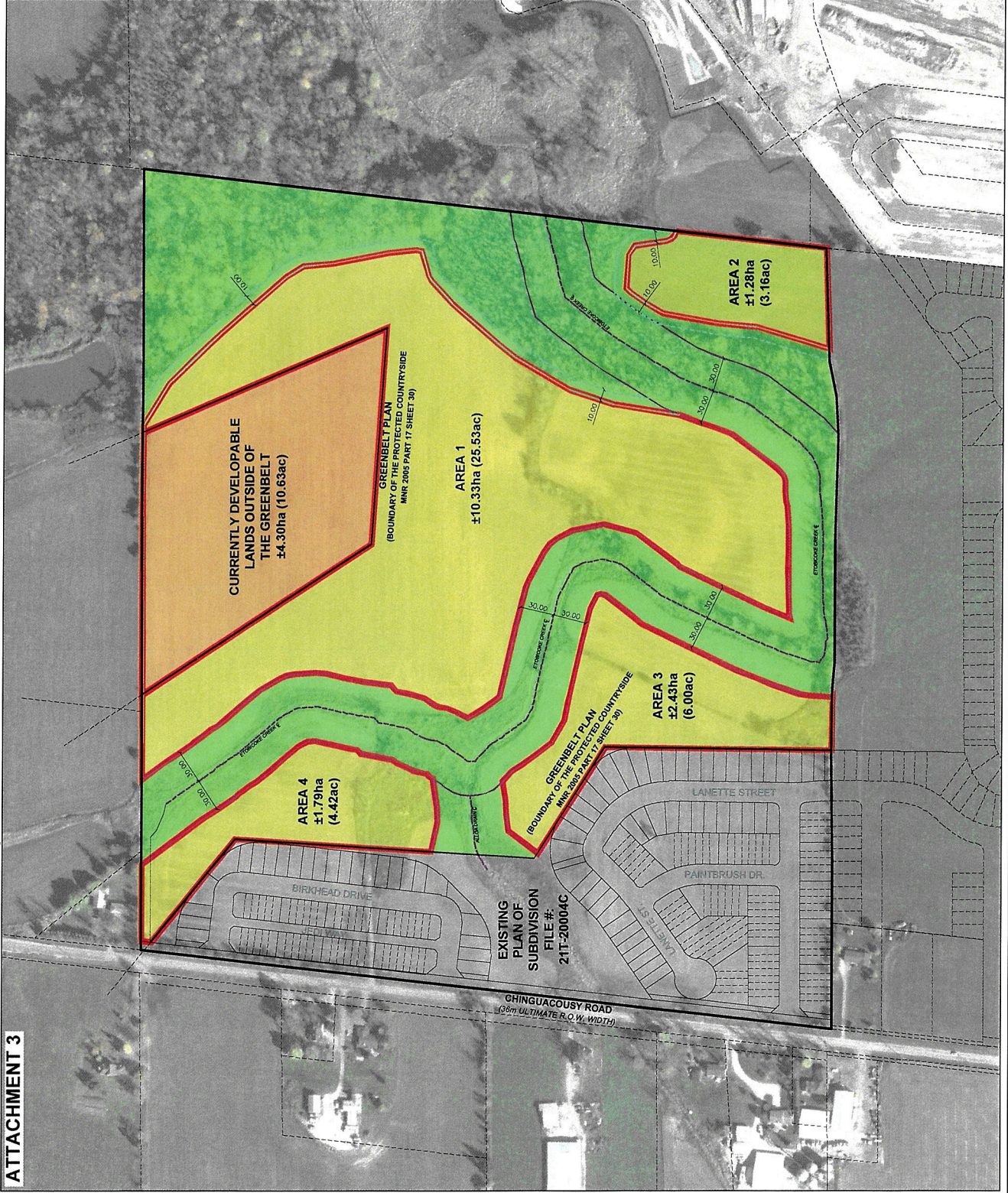
PART OF LOTS 18 - 20, CONCESSIONS 1 & 2, W.H.S.
TOWN OF CALEDON, REGIONAL MUNICIPALITY OF PEE



SCALE 1:5000
(24 x 36)
NOVEMBER 1, 2022



ATTACHMENT 3



APPROXIMATE NET DEVELOPABLE AREA WITHIN THE GREENBELT
FP MAYFIELD WEST (CALEDON) INC.

PART OF LOT 20, CONCESSION 2, W.H.S.
(GEOGRAPHIC TOWNSHIP OF CHINGUACOUSY, COUNTY OF PEEI)
TOWN OF CALEDON
REGIONAL MUNICIPALITY OF PEEI

LEGEND

APPROXIMATE NET DEVELOPABLE AREAS WITHIN THE LIMITS OF THE GREENBELT:

- AREA 1: ±10.33ha (25.53ac)
- AREA 2: ±1.28ha (3.16ac)
- AREA 3: ±2.43ha (6.00ac)
- AREA 4: ±1.79ha (4.42ac)
- TOTAL: ±15.83ha (39.12ac)**

CURRENTLY DEVELOPABLE LANDS:
±4.30ha (10.63ac)

- APPROXIMATE DRIPLINE LIMIT
- 10m DRIPLINE BUFFER
- 30m WATERCOURSE BUFFER
- EXISTING GREENBELT LIMIT
- APPROXIMATE NHS AREAS

SCALE 1:1500
(2" = 30')

