

FIELDGATE DEVELOPMENTS

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December 3, 2022

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON
M7A 213

Attention: Hon. Steve Clark, Minister

RE: Proposed Amendments to the Greenbelt Plan (ERO: 019-6216)
Request for Removal from Greenbelt Plan Area
12697 Creditview Developments Limited
12697 Creditview Road, Town of Caledon

12697 Creditview Developments Limited - a Fieldgate Developments company - is the owner of lands municipally known as 12697 Creditview Road (subject lands), located within the Alloo Planning area in the Town of Caledon. The subject lands are located on the east side of Creditview Road, south of Old School Road and has an area of approximately 40 hectares (99 acres). See Context Plan on Attachment 1.

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 Technically 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 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.

The northerly portion of the subject lands abuts the Province's GTA West Technically Preferred 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).

Request for Greenbelt Plan Removal

In light of the settlement area expansion surrounding the Greenbelt at this location, we wish to request the Ministry's re-evaluation 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 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 removal.

In support of our request, we enclose a Greenbelt Overlay Plan (Attachment 3) showing approximately 4.21 hectares (\pm 10.4 acres) of land within the Greenbelt of which is partly used for agricultural purposes 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:

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 10.4 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.

2. 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.

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 lands requested to be removed from the Greenbelt Plan Area are located adjacent to the edge of the 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 lands requested to be removed from the Greenbelt Plan Area are located in a planning area 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 service, 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.

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 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.

The Greenbelt on the Subject Lands does not meet Provincial Criteria

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

As shown on Attachment 3 (Greenbelt Overlay Plan), the Greenbelt Plan Area in the vicinity of the Subject Lands is bisected by 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 north and east.

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. 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 is not conducive to supporting agricultural uses in the long term.

Due to the past planning decisions and configuration of the settlement area, the lands in question already represent a fragmented portion of the Greenbelt, 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 partly 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 Alloo Secondary Plan, a Comprehensive Environmental Impact Study and Management Plan will be required by the governing Conservation Authorities to determine appropriate measures to protect and enhance the existing natural heritage features as required to support adjacent urban development.

Any components of the subject lands which contain natural heritage 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 to the south and the GTA West Technically Preferred Route to the north 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.

The location of these lands adjacent to the GTA West Technically Preferred Route and in particular, the future Highway 413 Transitway, serve as optimal lands for the location of intensified housing forms such as townhouses. 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 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 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.

Conclusion

These lands serve as an optimal location for new housing given its proximity 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.

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 remove the Greenbelt Plan designation from the Subject Lands.

Additionally, we request that the Greenbelt legislation and/or regulations be amended to permit urban uses on land within and contiguous to the Greenbelt boundary that is outside of environmental features whose boundaries have been established by detailed environmental studies, such as a Master Environmental Servicing Plan, and have been agreed to by the municipality and local conservation authority. Such an amendment could very easily make more homes possible very quickly in areas already approved for growth while still ensuring that environmental features are protected.

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12697 Creditview Road, Town of Caledon

We appreciate the opportunity to make our 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.

Yours very truly,

FIELDGATE DEVELOPMENTS



Richard Mangotich
Senior Vice President

RM:mh
Encl. 3

ATTACHMENT 1



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

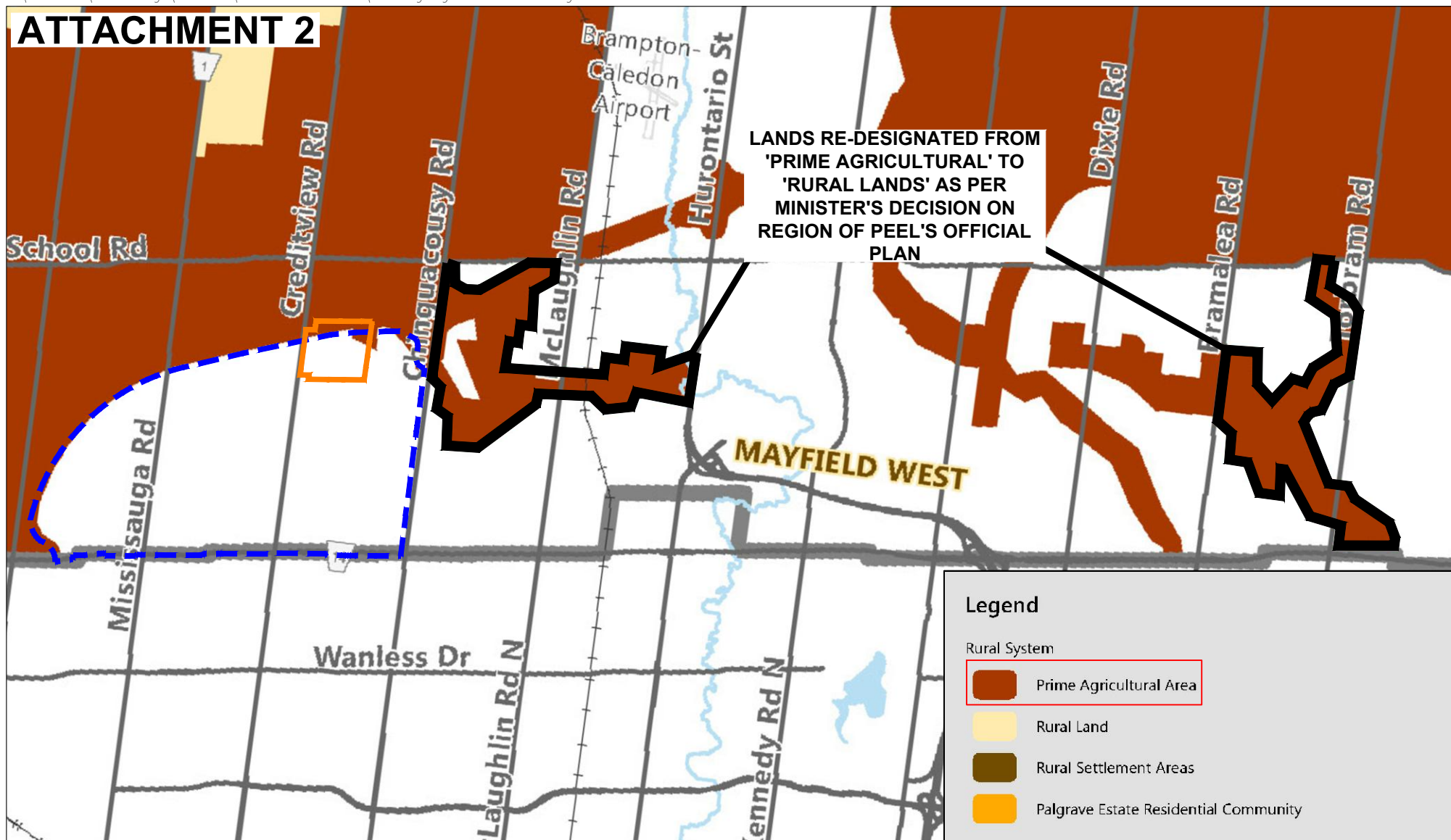
LEGEND

- SUBJECT LANDS
- ALLOA PLANNING BOUNDARY



SCALE: NTS
DECEMBER 2, 2022

ATTACHMENT 2



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

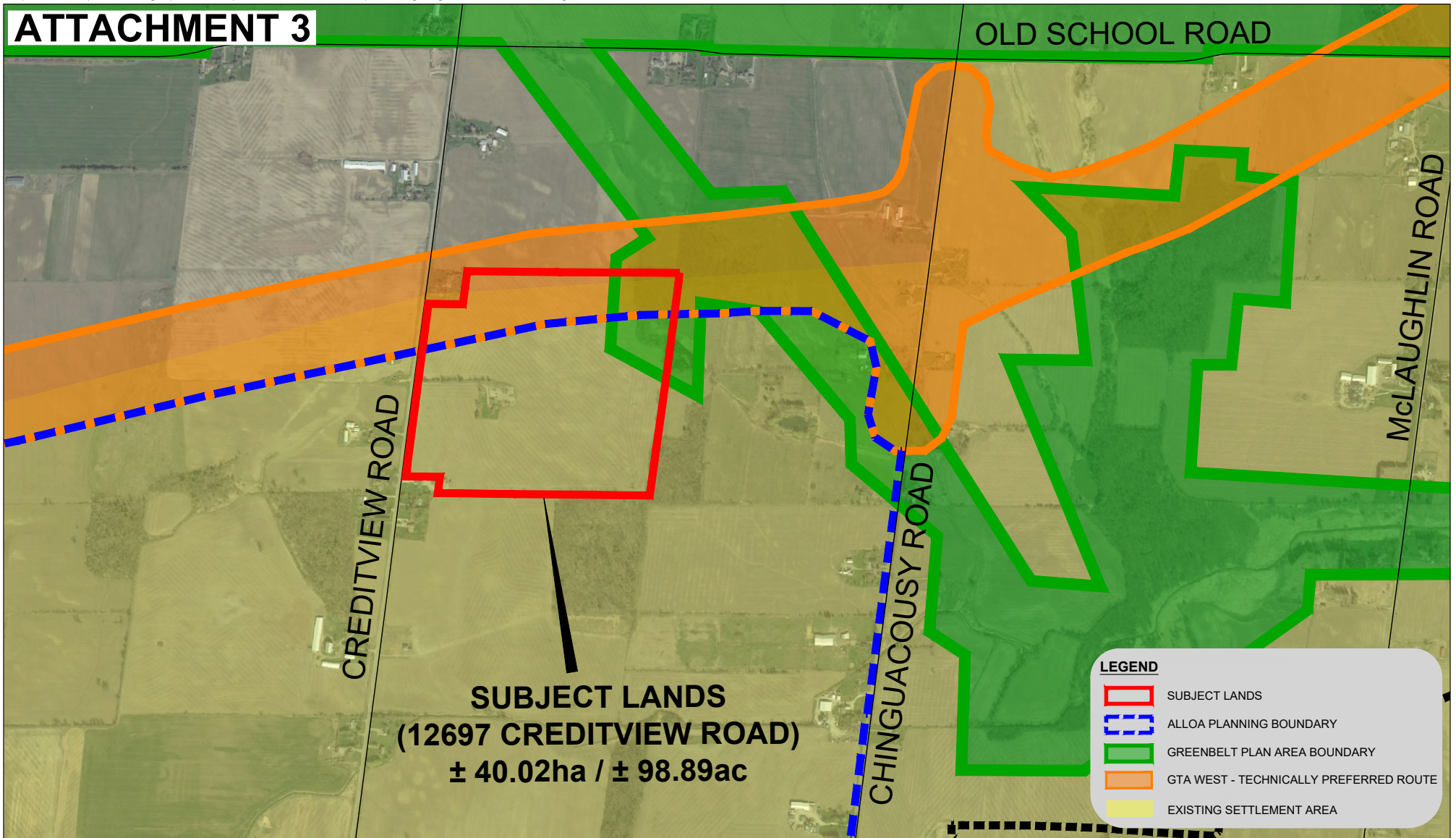
LEGEND

- SUBJECT LANDS
- ALLOA PLANNING BOUNDARY



SCALE: NTS
DECEMBER 2, 2022

ATTACHMENT 3



GREENBELT OVERLAY PLAN

TOTAL GREENBELT AREA WITHIN SUBJECT LANDS: ± 4.21ha / ± 10.40ac



SCALE: NTS
DECEMBER 2, 2022