

March 10, 2021
HPGI File: 17497

Regional Planning and Growth Management

100 Peel Centre Drive, Suite A
Brampton, ON
L6T 4B9

**Attn: Tara Buonpensiero, Acting Manager, Policy Development
Kathryn Dewar, Principal Planner**

**Re: Request for Urban Area Boundary Expansion (Palgrave Settlement Area)
Region of Peel Municipal Comprehensive Review
8575 Patterson Sideroad, Town of Caledon
Ross & Linda Gray**

Further to previous comment letters provided directly by the Owners, Ross and Linda Gray, dated March 6, 2019, April 18, 2019 and November 18, 2020, Humphries Planning Group Inc. (HPGI) is providing further comments in support of the request that the subject property, 8575 Patterson Road in the Town of Caledon, be included within the Town's settlement boundary for Palgrave. These comments are being made in relation to Peel Region's Municipal Comprehensive Review (MCR) in support of the inclusion of the subject property within the Town of Caledon's urban boundary to accommodate a future residential area expansion for the Palgrave Rural Settlement Area.

Property Description and Surrounding Context

The subject property is located on the south side of Patterson Sideroad between Highway 50 and Duffy's Land in the Town of Caledon. **Figure 1** below provides an aerial photograph illustrating the subject property. The area of the property is approximately 32.44 hectares (80.16 acres) with approximately 983.96 metre frontage along Patterson Sideroad and an approximately 203.89 metre frontage along Highway 50. The property is located immediately south of the Palgrave Rural Settlement Area.

The property was previously used for a mineral aggregate operation, however this use has not existed on the property for some time. The land does not contribute to the agricultural sector in any significant way, as it has low agricultural viability. The lands have low agricultural priority due to previous extraction activities and lack of farming activity. The subject property's adjacency and proximity to an existing settlement area also make the property less desirable for future agricultural-related uses given the high occurrence of non-farm uses and the potential for land use conflicts.

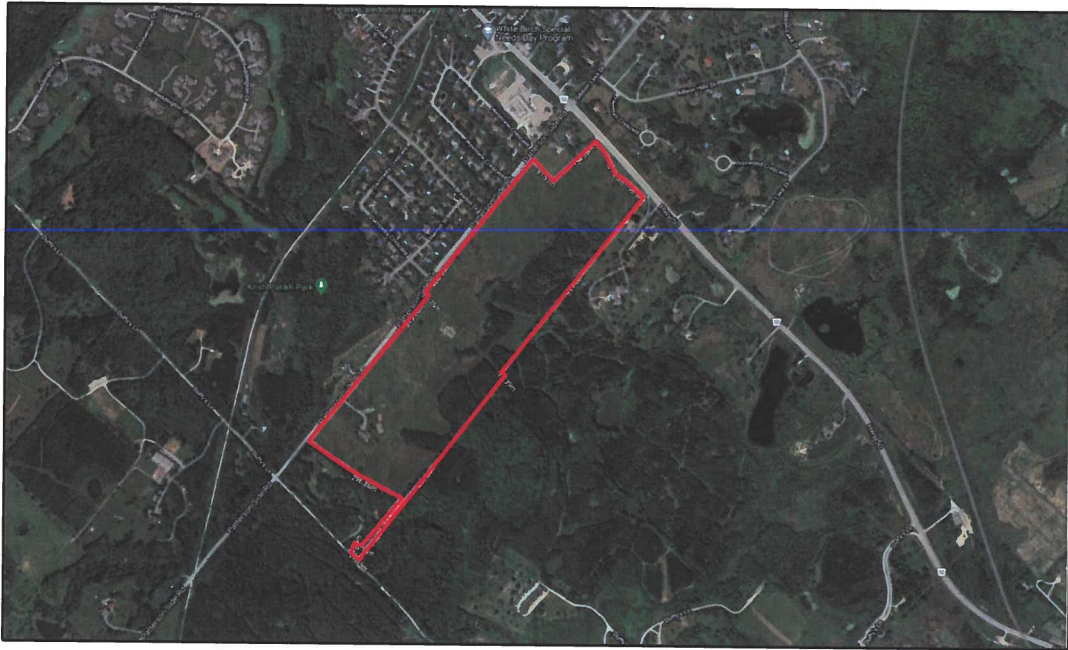


Figure 1 - Aerial Photograph of Subject Property

The Owners currently reside on the property, and as such there is a home and associated ancillary buildings and structures. The remainder of the subject property generally consists of vacant lands and natural heritage features including densely grouped treed areas along the southern property limits and hedgerows along the perimeter of the property.

The surrounding area can be characterized as a mix of agricultural, rural residential, estate residential, open space and institutional uses including the Palgrave Public School, the Palgrave Estates Residential Subdivision and the Caledon Trailway Path.

Settlement Area Boundary Expansion Request

The Owner's previous submissions requested that the subject property be considered for inclusion within the Palgrave Rural Settlement Area boundary to accommodate the forecasted residential growth outlined by the Growth Plan and based on the evaluation criteria developed by the Region for Settlement Area Boundary Expansion. Additional support for such consideration has been provided previously related to included technical analysis and studies conducted by consultants which included Environmental Study Report, Geotechnical Assessment, preliminary Servicing Plan and Water Balance Report. All these items were submitted previously and demonstrate the suitability of the property for residential land uses as part of application for Official Plan Amendment, which was filed in 1989 to amend the Town of Caledon Official Plan to include the subject property within the Palgrave Village Settlement Area (Town file: OPA 8901), which still remains open. Also, a formal submission was made to Town of Caledon on March 7, 2019 requesting the subject property be included in a settlement boundary expansion to Palgrave, as part of the Town's Official Plan 2041 Review process.

HPGI will review the Provincial Policy framework, specifically the Growth Plan and related Plans, and analyze how it supports the request for inclusion of the subject property within the Palgrave Rural Settlement Area boundary as part of this submission.

A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020

While the Provincial Policy Statement provides overall policy direction related to matters of provincial interest, the Growth Plan for the Greater Golden Horseshoe (the “Growth Plan”) provides strategic guidance for the growth and development of communities within the Greater Golden Horseshoe (“GGH”). The Growth Plan was released by the Province in 2006, however, it was recently updated in 2019 and further amended in 2020. The new Growth Plan builds upon the previous version of the Growth Plan and provides enhanced policy direction to guide development in the Golden Horseshoe region to the year 2051. All decisions made on or after May 16, 2019, with respect to any planning matter for lands within the Growth Plan area are required to comply with policies of the Growth Plan (2019) and Amendment 1 (2020).

The intent of the Growth Plan is to achieve the development of compact vibrant complete communities and to plan and manage growth in order to support a strong and competitive economy in the Greater Golden Horseshoe. Within the Growth Plan the Oak Ridges Moraine and the Niagara Escarpment are considered components of the *Greenbelt Area*.

The Growth Plan, 2020 provides for Section 2.2.8 – Settlement Area Expansions, in which 2.2.8.3 states, in part:

3. Where the need for a *settlement area* boundary expansion has been justified in accordance with policy 2.2.8.2, the feasibility of the proposed expansion will be determined and the most appropriate location for the proposed expansion will be identified based on the comprehensive application of all of the policies in this Plan, including the following:

- k) within the Protected Countryside in the *Greenbelt Area*:
 - i. the *settlement area* to be expanded is identified in the Greenbelt Plan as a Town/Village;
 - ii. the proposed expansion would be modest in size, representing no more than a 5 per cent increase in the geographic size of the *settlement area* based on the *settlement area* boundary delineated in the applicable official plan as of July 1, 2017, up to a maximum size of 10 hectares, and residential *development* would not be permitted on more than 50 per cent of the lands that would be added to the *settlement area*;
 - iii. the proposed expansion would support the achievement of *complete communities* or the local agricultural economy;

- iv. the proposed uses cannot be reasonably accommodated within the existing *settlement area* boundary;
- v. the proposed expansion would be serviced by existing *municipal water and wastewater systems* without impacting future *intensification* opportunities in the existing *settlement area*; and
- vi. expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited.

Each of the criteria noted above for a potential boundary expansion into the Protected Countryside in the *Greenbelt Area* are reviewed below as they apply to the boundary expansion request for the subject property:

- i. **the *settlement area* to be expanded is identified in the Greenbelt Plan as a Town/Village;**

Under the Oak Ridges Moraine Conservation Plan (ORMCP), 2017, Palgrave is identified as a Rural Settlement. Within the Greenbelt Plan, 2017, Palgrave is identified as a Rural Settlement within the ORM Area, as illustrated in **Figure 2**. The Greenbelt Plan, also identifies Hamlets which are a settlement area that is distinct from the Towns and Villages designation.

According to the Greenbelt Plan, Section 1.4.2 – Structure of the Plan: “*Settlement areas are comprised of Towns/Villages and Hamlets. Although this Plan shows boundaries for Towns/Villages, Hamlets are only shown as symbols. In both cases, this Plan defers to official plans for the detailed delineation of settlement area boundaries. Generally, this Plan does not apply to lands within the boundaries of Towns/Villages and Hamlets. Official plans will continue to govern land use within these settlement areas based on policy direction provided by the Growth Plan. However, where expansions to settlement areas are proposed in the Greenbelt, the policies of both this Plan and the Growth Plan apply to such expansions.*”

The Greenbelt Plan distinguishes further between Towns/Villages and Hamlets in Section 3.4 Settlement Areas:

“Towns/Villages have the largest concentrations of population, employment and development within the Protected Countryside and tend to be the central settlement area(s) for their respective municipalities. Although most have full municipal water and sewer services, some only have a municipal water service and/or a combination of private and municipal water services. Towns/Villages are the focus of development and related economic and social activity.

Hamlets are substantially smaller than Towns/Villages and play a significantly lesser role in accommodating concentrations of residential, commercial, industrial and institutional development. Further, they are typically serviced with individual on-site sewage and water services and thus are not locations to which growth should be directed.”

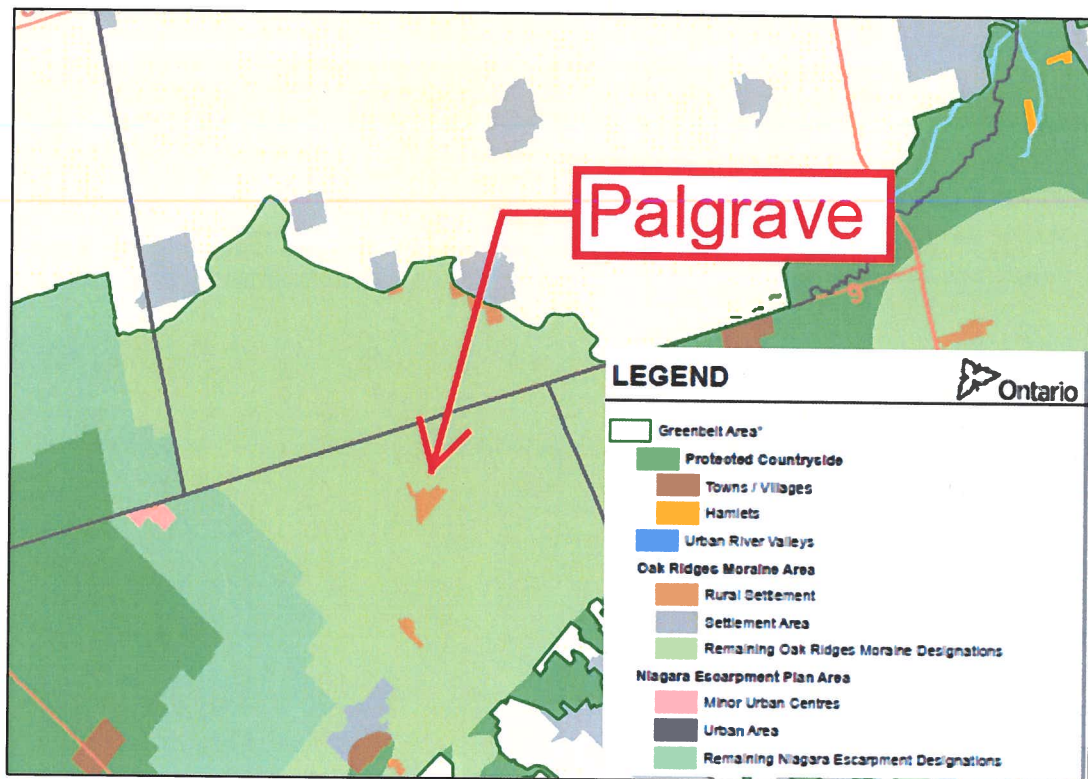


Figure 2 – Greenbelt Plan – Schedule 1 – Greenbelt Plan Area

The Palgrave Rural Settlement area is not identified as a Hamlet, but rather a Rural Settlement Area. The intent of policy 2.2.8.2.3.k) i. of the Growth Plan is to not allow for expansions of Hamlet Areas. This is further supported by the fact that in 2017 the Greenbelt Plan removed the policy that allows for minor rounding out of Hamlets within the Greenbelt Area. As Palgrave is not identified as a Hamlet within the Greenbelt Plan, consideration for the expansion of the Rural Settlement Area is appropriate.

- ii. the proposed expansion would be modest in size, representing no more than a 5 per cent increase in the geographic size of the *settlement area* based on the *settlement area* boundary delineated in the applicable official plan as of July 1, 2017, up to a maximum size of 10 hectares, and residential *development* would not be permitted on more than 50 per cent of the lands that would be added to the *settlement area*;

As illustrated in Figure 3, the Palgrave Rural Settlement Area is approximately 75 hectares (185 acres) in size. This does not include the several estate residential

subdivisions that are in close proximity to Palgrave. A 5% increase is equal to 3.75 hectares (9.2 acres).

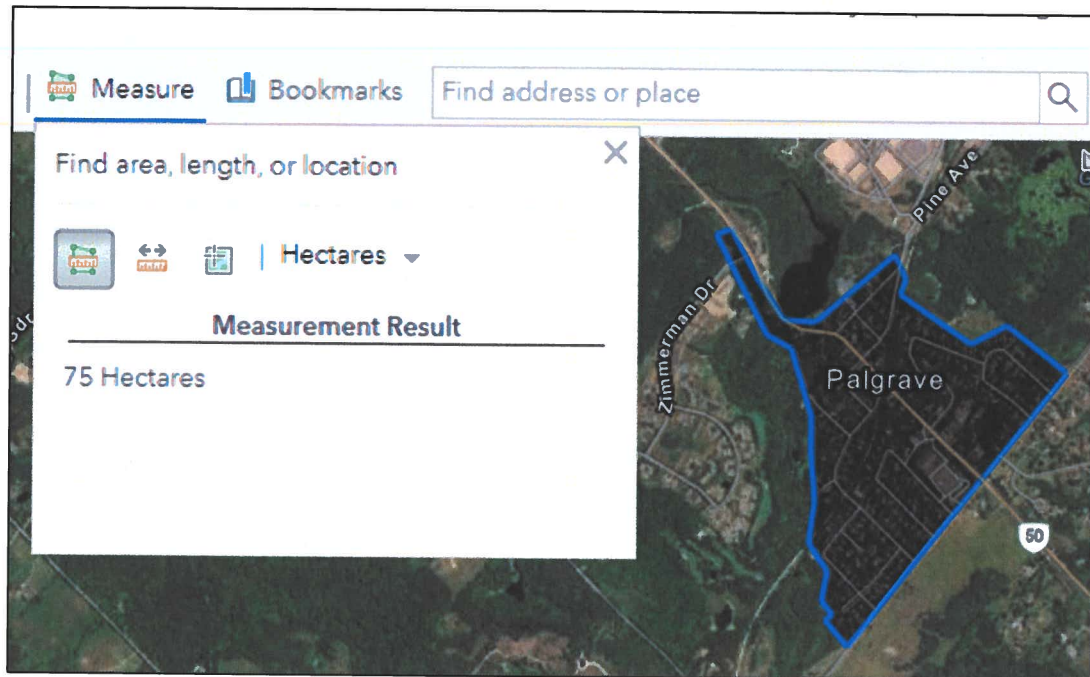


Figure 3 – Measurement of Palgrave Rural Settlement Area (Source Peel Region Arch GIS Mapping)

In Figure 1 – Growth Plan Policy Areas in Caledon of the Town of Caledon Official Plan, 2008, shown as **Figure 4** below, when both the Palgrave Settlement Boundary is considered as well as the Palgrave Estate Residential Community, the approximate size of the area is 3,050 hectares (7,536 acres), of which 5% would equate to 152 hectares (375 acres).

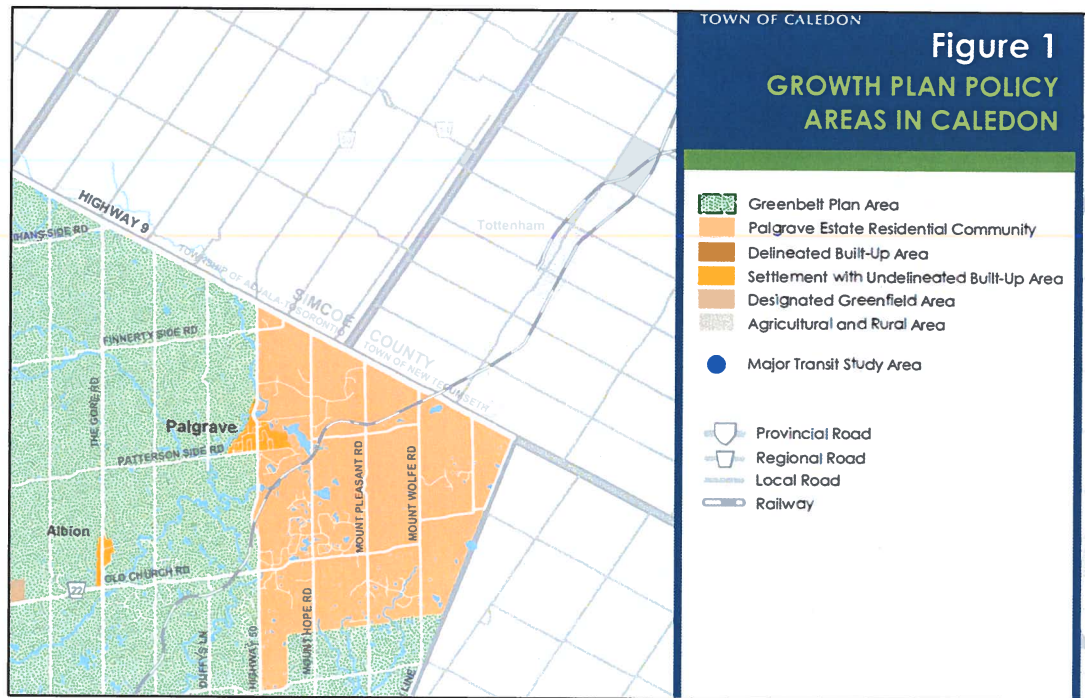


Figure 4 – Town of Caledon Official Plan, 2008 - Figure 1 – Growth Plan Policy Areas in Caledon

Settlement area is a specifically defined term in Section 7 – Definitions of the Growth Plan:

Settlement areas: Urban areas and *rural settlements* within municipalities (such as cities, towns, villages and hamlets) that are:

- a) built up areas where development is concentrated and which have a mix of land uses; and
- b) lands which have been designated in an official plan for development in accordance with the policies of this Plan. Where there are no lands that have been designated for development, the *settlement area* may be no larger than the area where development is concentrated.

(Based on PPS, 2020 and modified for this Plan)

Per the definition of *settlement area*, the rural settlement considered as *settlement area* must not only be designated, but also built up. Per this definition, Schedule F – Rural Estate Residential Areas of the Town of Caledon Official Plan, 2008, shown as **Figure 5** below, provides an appropriate outline of the Palgrave *settlement area*. Both the Rural Estate Residential Area and Settlement Area designations are included in the Palgrave *settlement area* per the definition of *settlement area* in the Growth Plan.



Figure 5 – Town of Caledon Official Plan, 2008 - Figure 1 – Growth Plan Policy Areas in Caledon

By including the Rural Estate Residential Area designation within the Palgrave Settlement Area, the overall area is approximately 426 hectares (1,052 acres) in size, as illustrated in Figure 6. A 5% increase is equal to 21 hectares (51.8 acres).



Figure 6 – Measurement of Palgrave settlement area (Source Peel Region Arch GIS Mapping)

The subject property is 32.44 hectares (80.16 acres), of which a portion is not developable, as there are environmental features on it. Development could proceed in an environmentally acceptable manner, through the identification on the ground and protection of any Key Natural Heritage Features on site with associated buffer areas. As such, the requested expansion would not result in the development of the entire property. For this reason, it is appropriate to include the entire property within the Palgrave Rural Settlement area.

iii. the proposed expansion would support the achievement of *complete communities* or the local agricultural economy;

Smaller Rural Settlement Areas, including Palgrave, function as secondary settlement areas in the Town and are intended to accommodate growth in limited forms. These smaller settlements provide a unique opportunity with regard to their ability to accommodate controlled growth and function as smaller ‘complete’ communities, which include a range of permitted uses and a land use structure within which they are guided.

The requested residential expansion of the subject property would support and facilitate the continued concentration of residential land uses and limited urban activities already established in Palgrave. The subject property is immediately adjacent to the existing Palgrave Settlement Area and is surrounded by a number of urban land uses including institutional uses (i.e. the Palgrave Public School), commercial and service related uses along Highway 50 and residential community areas. Inclusion of the subject property will also support continued population-related retail and commercial investment in Palgrave as well as potential enrollment at the public school.

iv. the proposed uses cannot be reasonably accommodated within the existing *settlement area* boundary;

There is limited opportunity for residential development remaining within the current settlement area boundary of Palgrave as it is largely built out and surrounded by the Protected Countryside area of the Greenbelt Plan and Oak Ridges Moraine Conservation Plan. These permanently protected areas pose significant constraints to any outward urban expansion and will limit the future supply of land suitable for residential uses, which, could be accommodated in strategic locations including rural lands located on the periphery of established settlement areas, such as the subject property.

v. the proposed expansion would be serviced by existing *municipal water and wastewater systems* without impacting future *intensification opportunities* in the existing *settlement area*;

The proposed expansion of the Palgrave Rural Settlement Area would not impact any future opportunities for intensification within the settlement area by constraining the capacity of the municipal water and wastewater system. Palgrave has municipal water, but does not have wastewater.

The Rural Area policies of the Growth Plan in Section 2.2.9 state the following:

7. Notwithstanding policy 2.2.8.2, minor adjustments may be made to the boundaries of rural settlements outside of a municipal comprehensive review, subject to the following:

c) confirmation that water and wastewater servicing can be provided in an appropriate manner that is suitable for the long-term with no negative impacts on water.

Palgrave Rural Settlement and Palgrave Estate Residential Community both have municipal water, but not municipal wastewater. As such, partial servicing will have no negative long-term impacts on water, which is a particular issue that must be addressed when modifying the boundaries of Rural Settlements. Also, in the ORMCP the recognition of the appropriateness and suitability for partial services in the Palgrave Estate Residential Community is recognized.

Section 44 (1) of the ORMCP states that:

“The construction or expansion of partial services is prohibited,” however Section 44 (4) states: *“Subsection (1) does not apply to prevent the construction or expansion of partial services in the Palgrave Estate Residential Community, as shown on the land use designation map referred to in section 2.”*

Dwellings by Structural Type

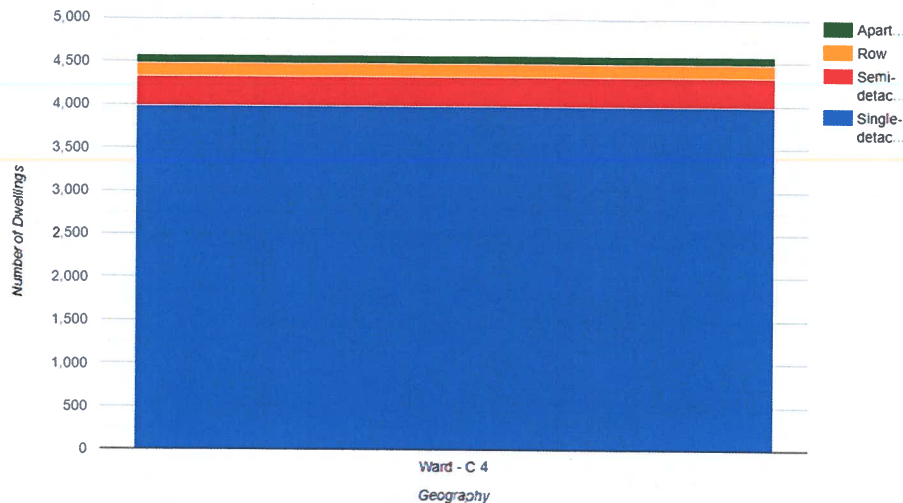


Figure 7 –Chart: Dwelling by Structure Type –Ward 4 Caledon (Source: Peel Demographic Data)

Peel Region 2016 Census and Demographic Data based on Ward Profiles, confirms that Caledon Ward 4 has a population of 14,575 and 4,570 dwellings, which equals to an average of 3.2 people per dwelling. A large majority of those dwellings 3,980 (87%) are single detached dwellings. Also, a majority of individuals in Ward 4 Caledon are single parents or couples with children, specifically 3,065 (67%). The subject site provides an opportunity to provide a greater range of housing opportunities to the area.

Policy 1.6.6.2 of the PPS 2020 states:

Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services.

Per the above policy, intensification is generally only promoted in settlement areas that have full municipal servicing and as such, expansion of the Palgrave Rural Settlement Area, which is on partial servicing, is not anticipated to jeopardise any future intensification opportunities.

- vi. expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited.**

The subject property does not have a Natural Heritage System designation on the property however, a portion of the subject property is identified as 'Natural Core Areas' in the ORMCP, which are areas where it is intended to protect the lands with concentrations of natural heritage features to maintain the integrity of the Moraine. The land use designations

map of the ORMCP with the property boundaries is provided below as **Figure 8** and illustrates the portions of the property that are within the 'Countryside Area' and 'Natural Core Area'.



Figure 8 – ORMCP Land Use Designation Map

Per the previously submitted Environmental Study Report, a portion of the property can accommodate potential future development that is compatible with the surrounding land uses. Development could proceed in an environmentally acceptable manner, through the identification on the ground and protection of any Key Natural Heritage Features on site. As such, the requested expansion would not extend into the Natural Area of the subject property.

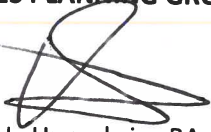
Conclusion

Based on the above, it is HPGI's opinion that the subject property should be considered for a settlement area boundary expansion as part of the ongoing MCR and Official Plan Review process and represents an appropriate extension to the Palgrave Rural Settlement Area. The above noted analysis outlines how, specifically related to the Growth Plan policies, it is appropriate to consider a settlement area boundary expansion to the Palgrave Rural Settlement Area and how the subject property is an ideal candidate from a residential growth site selection perspective and a logical place to accommodate a minor share of the overall future planned growth in the Town and Region.

If you have any questions or concerns, please contact the undersigned at ext. 244 or Mark McConville at ext. 246.

Yours truly,

HUMPHRIES PLANNING GROUP INC.



Rosemarie L. Humphries BA, MCIP, RPP
President

cc. Adrian Smith, Chief Planner and Acting Director
Virpal Kataure, Principal Planner
Naheeda Jamal, Region of Peel
Sylvia Kirkwood, Chief Planner Town of Caledon
Marisa Williams, Acting Manager, Policy, Heritage and Design Town of Caledon
Mayor Allan Thompson, Mayor Town of Caledon
Councillor Nick de Boer, Ward 3 and 4 Local Area Councillor
Councillor Jennifer Innis, Ward 3 and 4 Regional Councillor