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Town of Caledon
6311 Old Church Road
Caledon, ON L7C 1J6

via email: howson@mshplan.ca

Attention: Elizabeth Howson
Principal, Macaulay Shiomi Howson Ltd., Acting on behalf of Town of Caledon
Planning Department

Dear Ms. Howson:

RE: Application to Amend the Official Plan (POPA 2023-0006)
Planning Opinion Report Addendum

Malone Given Parsons Ltd. (“MGP”) is the planning consultant for Brookvalley Project Management Inc. (“Brookvalley”), who manage six parcels of land within the Mayfield West Phase 2 – Stage 3 (“MW2-3”) area of the Town of Caledon. On behalf of Brookvalley, we submitted an Official Plan Amendment (“OPA”) application to the Town on July 15, 2022, which was subsequently deemed complete on November 20, 2023. We received comments from the Town and other circulated agencies on February 9th, 2024 and facilitated a charette meeting with Town staff and other agencies on March 4, 2024 to discuss the comments and any other questions on the OPA application. Based on the comments received, the following provides an addendum to the Planning Opinion Report that was submitted to the Town on July 15, 2022.

At the time of submission of the OPA application, the Region of Peel Official Plan 2051 “RPOP 2051” was adopted by Regional Council but not approved by the Province. It is understood that on November 16, 2023, Bill 150, the Planning Statue Law Amendment Act, 2023 was introduced, which proposed winding back ministerial modifications to approved official plans in twelve municipalities, including Peel Region. Bill 150 received Royal Assent on December 6, 2023, therefore the changes from Bill 150 are in-effect at this time. As a result of Bill 150, the modifications made to the RPOP 2051 by the province would be reverted back to the original RPOP 2051 adopted by the Region on April 28, 2022. On February 20, 2024, the Province introduced Bill 162, the Get It Done Act, 2024, which proposes changes to Bill 150 to modify a number of official plans and official plan amendments and retroactively re-enact these changes. Bill 162 received Royal Assent on May 16, 2024, and did not incorporate the provincial modification to redesignate the portion of the Subject Lands from “Prime Agricultural Area” to “Rural Lands”.

Accordingly, the areas within the Greenbelt Plan area remain designated as Prime Agricultural Area by the Peel Region Official Plan and that policy sections apply in the Greenbelt Plan,

2017. Section 3.1.3.3 of the Greenbelt Plan permits non-agricultural uses subject to the policies under sections 4.2 to 4.6 and subject to the completion of an agricultural impact assessment. Non-agricultural uses include recreational uses, such as parks and trails. An Agricultural Impact Assessment was completed by Stantec Consulting Inc. and was included in the OPA application submission in July 2022. The Agricultural Impact Assessment concludes that due to the proximity to the urban boundary, the lands in the Greenbelt Plan area and GTA West Corridor cannot function as a prime agricultural area. Furthermore, the proposed GTA West corridor would make it more difficult for farm equipment to cross the corridor and in effect isolate the agricultural portion of the Subject Lands from the remaining agricultural lands to the north. As such, it is appropriate to permit recreational uses within the Prime Agricultural Area of the Greenbelt Lands outside of natural heritage features and their associated vegetation protection zones.

Based on the comments received from the Region of Peel and the Town of Caledon, a number of additional technical studies were requested from the initial submission, which are listed below. Our response to each technical study is provided in this addendum letter to satisfy the study requirements.

- A Staging and Sequencing Plan (A Scoped Development Staging and Sequencing Plan);
- A detailed Subwatershed Study or equivalent study (A Gap Analysis of all existing reports in addition to the CEISMP);
- A Community Energy and Emissions Reduction Plan (addressed in this addendum);
- A Climate Change Adaptation Plan (included in the Functional Servicing Report);
- A Housing Assessment (addressed in this addendum); and,
- A Framework Plan or Tertiary Plan that identifies complete road network, stormwater management facilities, parks, schools, heritage, natural heritage, land specific uses, transit and commercial lands (Figure 2.1 of the Community Design Plan Addendum).

A scoped Development Staging and Sequencing Plan is included in this OPA resubmission, which focuses on the residential and non-residential development within MW2-3 and provides a breakdown of the anticipated unit yield, net density and associated population yield for each residential designation in each phase of development.

As agreed upon at the charette meeting held with Town staff and other agencies, a Gap Analysis has been prepared based on the Terms of Reference for the Subwatershed Study and reviews all past technical reports and identifies that the balance of any information would be done through detailed design at the Draft Plan of Subdivision approval process. The Gap Analysis is included in this OPA resubmission.

It is our opinion that A Community Energy and Emissions Reduction Plan is not required as part of this OPA application, as it is not the intention to provide community-based energy production for MW2-3. The Mayfield West Phase 2 Secondary Plan policies strongly encourage innovation with regards to energy conservation and distributed energy resources, and provides specific measures to implement the Sustainable Residential Home Strategy prior to registration of the Draft Plan of Subdivision or Site Plan Approval. A policy has been included in the revised OPA to encourage any potential for energy savings at the individual building level.

To satisfy the requirement for a Climate Change and Adaptation Plan, it was agreed with staff that the revised Functional Servicing and Stormwater Management Report, prepared by Candevcon would address the mitigation and adaptation strategy for the Subject Lands.

Regarding the housing assessment, the RPOP 2051 emphasizes the need to promote the development of compact, complete communities by supporting intensification and higher density forms of housing (Section 5.9.1). Peel Region will collaborate with local municipalities to provide for an appropriate range and mix of housing types and densities by implementing Peel-wide new housing unit targets (Section 5.9.7). To demonstrate contribution towards the Peel-wide target, a housing assessment is required for planning applications of approximately 50 units or more (Section 5.9.11).

Based on Table 4 in the RPOP 2051, the affordability target includes 30% of all new housing units being affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households. The Regional rental target is 25% of all new housing units shall be rental tenure. With regards to density, 50% of all new housing units shall be forms other than detach and semi-detached houses.

To aid the Region in achieving these affordable housing targets, the proposed OPA permits and promotes the provision of additional residential units (“ARUs”) to achieve the Regional and local housing objectives. A new policy has been included in the proposed OPA (Section 7.14.11.4) that directs 20% of all single detached dwelling units to be planned to accommodate additional residential units and that 1 parking space shall be provided per unit where an ARU is provided. Based on the unit assumptions for single detached dwellings in the MW2-3 area, it is anticipated that approximately 340 ARUs will be provided. Given this, 7% of the total units proposed for the MW2-3 area will be considered affordable and rental units, through the provision of ARUs.

Additionally, the proposed OPA application permits a full range of housing types including single-detached, semi-detached, townhomes (street, back-to-back, and stacked townhomes), and low-rise apartments. In general, single-detached, semi-detached, and street townhomes are considered a ground-oriented form of housing that tends to be less affordable. Whereas, stacked and back-to-back townhomes tend to be more affordable given the nature of the dwelling type while offering a larger more family-oriented sized unit type. Based on the unit assumptions for the MW2-3 area, a total of 1,738 higher density townhouse units are proposed which equates to 37% of the total units proposed. The combination of requiring ARUs associated with single detached dwellings and providing higher density housing types results in a total of 44% inherently affordable units that will contribute to the affordable housing target and rental market in Caledon.

An addendum to the Community Design Plan (“CDP”) prepared for the Mayfield West Phase 2 Community has been prepared to provide design guidance for the MW2-3 lands to ensure that that the entire Mayfield West Phase 2 community is planned comprehensively. The CDP addendum details the physical design of the community, including the proposed collector road network, proposed locations of stormwater management facilities, locations of schools and parks and design guidance for residential and mixed use areas.

It should also be noted that the revised OPA includes updated park locations and sizes, based on discussions with staff at the charette meeting. The amended Schedule B-2 depicts the proposed parks symbolically to provide for flexibility in the size and location of the parks through the development approvals process. As a result of the changes to the Land Use Plan, an updated parkland calculation was completed and is detailed in the table below.

Ontario Planning Act				
Net Area ¹ (ha)	Population	Units	Parkland Rate	Total Parkland Required (ha)
190.5	15,318	4,687	5%	9.5

Note:

1 - Net area excludes Environmental Policy Area, Greenbelt Plan Area and Future Trail System

Additionally, we would like to acknowledge that we have received comments from the Ministry of Energy with respect to the Northwest Transmission Corridor Study Narrowed Area of Interest. We understand that the Subject Lands are located within the Narrowed Area of Interest, which corresponds to the Highway 413 Technically Preferred Route. However, it remains our opinion that although these studies are being conducted separately, the transmission corridor will be provided adjacent to the Highway 413 and as such an adjustment to the Narrowed Area of Interest would be required should the alignment of Highway 413 be revised. We have submitted multiple comments to the Highway 413 Project Team requesting that the Technically Preferred Route be changed to reflect the Alternative Route S4-2, which forms the basis of our OPA application. Should our preferred Alternative Route be considered, it is our opinion that the Narrowed Area of Interest for the NW Transmission Corridor be adjusted accordingly. We are currently in ongoing discussions with the Ministry of Energy to discuss this matter further.

The Official Plan Amendment for the MW2-3 lands has been revised in accordance with the comments received from the Town and other agencies and to address the outstanding policy considerations as noted above. As such, it is our opinion that the proposed OPA continues to represent good planning as it is consistent with the policies of the PPS, conforms to the policies of the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan, and the RPOP 2051, and conforms to the intent of the Town of Caledon OP and Mayfield West Phase 2 Secondary Plan.

Should you wish to discuss any matters described in this letter further, please do not hesitate to contact me.

Yours very truly,

Matthew Cory, MCIP, RPP, PLE, PMP