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March 14, 2022

Delivered by Email

Regional Planning and Growth Management Committee
10 Peel Centre Drive, Suite A
Brampton, ON L6T 4B9

Mayor and Members of Council
Town of Caledon
6311 Old Church Road
Caledon, ON L7C 1J6

Dear Chair and Members of the Committee/Mayor and Members of Council:

Re: Peel 2051 Official Plan Review and Settlement Area Boundary Expansion

We act as counsel to Cedar City Developments Ltd. (“Cedar City”). Our client has undertaken major residential and commercial development projects across the GTHA, including projects currently underway in Caledon and Brampton in the Region of Peel (“the Region”).

Cedar City owns lands within the proposed Settlement Area Boundary Expansion (“SABE”), municipally known as 13070 Heart Lake Road, Caledon (the “Subject Lands”) located at the Northwest corner of Heart Lake Road and Old School Road. For nearly a year, Cedar City has participated in the ongoing Peel 2051 Official Plan Review, supporting the inclusion of its lands within the Community Area designation of the SABE.

On April 5, 2021, we sent a letter to the Region and the Town of Caledon’s Chief Planner on behalf of Cedar City in support of the proposed inclusion of the Subject Lands within the Community Area designation as shown on the concept map prepared by the Region’s planning and lands needs assessment consultant, Hemson, in their Planning Justification Report dated December 10, 2020. Cedar City reiterated its support for the proposed designation in a letter dated November 29, 2021 sent to the Region and the Town of Caledon’s Chief Planner in response to Regional documents which maintained the proposed designation of the Subject Lands as Community Area.

Early in the New Year, our client was surprised to learn that in December, 2021 the Town of Caledon had made submissions to the Region requesting certain revisions to the proposed mapping including changing the proposed designation of the Subject Lands from Community Area to Employment Area. Our client made an urgent request for delegation at the February 3, 2022

Regional of Peel Planning and Growth Management Committee meeting, and at that meeting, in the brief amount of time allocated for its deputation, our client provided the Committee with a summary of its participation in the process together with a summary rationale for maintaining the Subject Lands as Community Area in keeping with the Hemson Planning Justification Report.

At the time of preparing and making its deputation to the Committee, our client was unaware that Hemson had in fact already issued a further memorandum in response to the Town's submissions, which concluded that *"no changes to the LNA analysis, findings and recommendations are warranted based on the comments received"*. Our client was further surprised and dismayed to learn that the Hemson response, which was dated January 17, 2022, was not released to the public or referenced in any public materials before the date of the meeting. A copy of Hemson's response was not included in the public agenda or the meeting package materials for the February 3, 2022 meeting. Had our client been aware of the Hemson memorandum, they would have included reference to that report in their deputation. Our client is gravely concerned by the lack of transparency surrounding the Town's request for changes to the proposed designation of its property at a very late stage in the process, and disappointed by the apparent failure to release the response memorandum to that request by the Region's own planning and land needs consultant in advance of the February 3, 2022 Committee meeting.

Our client has retained Dana Anderson of MHBC Planning to undertake a detailed planning analysis of the SABE and the appropriate land use designation in relation to the Subject Lands. In undertaking her analysis, Ms. Anderson has considered inter alia the Hemson memorandum of January 17, 2022 referenced above (discussed at pages 10-11 of her report). A copy of Ms. Anderson's report with her findings and recommendations is attached for your review and consideration.

Ms. Anderson's states, *"In our opinion, the Community Area designation is the appropriate and preferred designation for the Subject Lands, supported by the land needs analyses and relevant land use considerations, and represents good planning. The requested Employment Area designation is not appropriate for the Subject Lands from a land use perspective and is not supported by the land needs analyses. For the reasons noted, we recommend the Subject Lands be retained as Community Area."*

In aid of your review of Ms. Anderson's report, we wish to highlight some of the key findings and recommendations contained in the report as follows:

- **The SABE process has involved comprehensive technical and land use studies to identify the location and supply of future Community and Employment Areas. The review and assessment of the work is supported by the Town's and Region's consultants and continues to support the Community Area designation on the Subject Lands.**
- **The Community Area designation on the Subject Lands provides for the development of an important community node to provide for a full range of residential, employment and mixed uses and will not constrain uses to industrial within a more prescriptive longer term land use planning framework.**

- **The requested change to the Subject Land from Community to Employment Area is not justified or needed as confirmed by the Region's consultants.**
- **The implications of the changes on the Subject Lands from Community to Employment Area have not been assessed and could result in an undersupply of Community Land and opportunities to provide for the needs for retail and commercial uses to 2051.**
- **From a land use and compatibility perspective, the change requested by the Town as it relates to the Subject Lands in particular results in a loss of the opportunity to create appropriate transitioning between the Employment Area and residential development to the southwest. In addition, the Community Area designation would allow for a more appropriate interface with the natural heritage features.**
- **The Employment Area designation will fix the land use planning framework for the Subject Lands without flexibility for a range of residential and urban mixed uses, which in our opinion, is highly inappropriate for the lands.**

We respectfully submit that the Community Area designation on the Subject Lands should be restored as recommended in the Hemson Planning Justification report and LNA, and as recommended most recently in the report submitted by Ms. Anderson of MHBC Planning.

Sincerely,



Rick F. Coburn

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March 14, 2022

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22 Adelaide Street West
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Dear Mr. Coburn:

**RE: 13070 HEART LAKE ROAD, CALEDON
OUR FILE: 2266A**

The following letter provides an assessment of the property municipally addressed as 13070 Heart Lake Road, in the Town of Caledon (the "Subject Lands") in the context of its future land use designation as part of the Region of Peel's Municipal Comprehensive Review ("MCR") and the Town of Caledon's Official Plan update. The purpose of this letter is to address the changes proposed to the designation of the lands through the MCR process. This assessment includes a description of the Subject Lands, a summary of the policy process undertaken to date and how the Subject Lands has been identified, and an overall analysis and recommendation with respect to the most appropriate land use designation and long term planning for the lands.

KEY FINDINGS AND RECOMMENDATIONS

- The Subject Lands are located at the northwest corner of Heart Lake Road and Old School Road in the Town of Caledon. They offer a strategic and appropriate location with key frontage to support a range of uses within a Community Area designation.
- The Subject Lands are appropriately located to connect to the Mayfield West community to the south and to transition to future employment uses to the east.
- The SABE process has involved comprehensive technical and land use studies to identify the location and supply of future Community and Employment Areas. The review and assessment of the work is supported by the Town's and Region's consultants and continues to support the Community Area designation on the Subject Lands.
- The Community Area designation on the Subject Lands provides for the development of an important community node to provide for a full range of residential, employment and mixed uses and will not constrain uses to industrial within a more prescriptive longer term land use planning framework.

- The requested change to the Subject Land from Community to Employment Area is not justified or needed as confirmed by the Region's consultants.
- The implications of the changes on the Subject Lands from Community to Employment Area have not been assessed and could result in an undersupply of Community Land and opportunities to provide for the needs for retail and commercial uses to 2051.

PART A - DESCRIPTION OF THE SUBJECT LANDS

PHYSICAL CONTEXT

The Subject Lands are located on the northwest corner of Heart Lake Road and Old School Road in the Town of Caledon. The Subject Lands are comprised of a single parcel (PIN 142970127), are approximately 38.9 hectares in size and have 608 metres of frontage along Old School Road and 547 metres of frontage along Heart Lake Road.

The Subject Lands are relatively flat with limited vegetation and have an existing access point located along Heart Lake Road to the east. There is an existing single detached dwelling on Heart Lake Road, further north from the intersection of Heart Lake Road and Old School Road. The Subject Lands are primarily vacant and currently used as agricultural land.

SURROUNDING LAND USES

The following describes the existing land uses in the vicinity of the site:

North:	Open space/agricultural land is located to the north. There are a few single detached residential homes along Heart Lake Road further north.
East:	Open space/agricultural land is located to the east. Further east there are a few single detached residential houses.
South:	The Brampton Fairgrounds is located immediately south of Old School Road. Further southwest is a tributary and south of that is a low rise residential subdivision consisting of single detached, semi-detached homes and townhouses. This area is referred to as the community of Mayfield West.
West:	Open space/agricultural land is located to the west. Further west there are a few single detached residential homes along Old School Road.

REGION OF PEEL OFFICIAL PLAN

Based on the September 2021 Office Consolidation Official Plan, Schedule D – Regional Structure, the Subject Lands are currently designated as 'Rural System.'

Peel Region is currently undergoing its MCR. This review, called "Peel 2051" began several years ago. As part of this review, the Region has included the consideration of urban boundary expansion areas – known as the Settlement Area Boundary Expansion ("SABE") – to accommodate growth to 2051 as required by the Growth Plan for the Greater Golden Horseshoe ("Growth Plan"). The Subject Lands were originally identified

as part of the '2051 New Community Area' shown on draft Schedule Z1-Regional Structure and as 'Draft Conceptual Settlement Area Boundary Expansion' on draft Schedule Z2 – Strategic Growth Areas. The Subject Lands fall within the 'C32a – Mayfield West Addition' area. The future designation was recently revised from Community Area to Employment Area. This change is the focus of our review and will be discussed further in the process summary and assessment section of this letter.

TOWN OF CALEDON OFFICIAL PLAN

The Town of Caledon Official Plan was consolidated in April 2018. The Subject Lands are currently designated as 'Prime Agricultural Area' as shown on Schedule A – Land Use Plan. The Town of Caledon is also undertaking its Official Plan Review, whose process will also be further assessed in this letter, with specific regard to how the Subject Lands have been addressed.

TOWN OF CALEDON ZONING BY-LAW 2006-50

The Subject Lands are currently zoned 'Agricultural (A1)' Zone within the Town's Zoning By-law.

PART B - REGION OF PEEL AND TOWN OF CALEDON OFFICIAL PLAN REVIEWS - OVERVIEW

There has been a substantial amount of study and technical work completed in relation to the Official Plan Reviews for both the Region of Peel and the Town of Caledon. Both processes are now in the final steps of refining their final amendments and mapping to provide for the requirements under the Growth Plan to accommodate growth to 2051. Final recommendations are anticipated to be presented to the Region of Peel Growth Plan Committee for endorsement on April 7, and then to Council for adoption very soon afterwards.

REGION OF PEEL PROCESS – PEEL 2051

Peel 2051 was initiated by the Region of Peel in 2013 and included an entire consideration of a primary study area for potential urban boundary expansion areas. The initial study area was refined to a Focus Study Area (FSA) based on a number of criteria created through the SABE study process.

FOCUS STUDY AREA AND TECHNICAL REVIEW – JUNE 2020

In **June 2020**, Hemson Consulting on behalf of the Region of Peel, prepared a report as part of the consideration of areas for urban expansion entitled *Memorandum – SABE Study: Technical Studies Update*. This update provided summaries related to the technical reports and economic assessments to guide future land use planning in accommodating anticipated population and employment growth across the Focus Study Area ("FSA"). The FSA was divided into sub-areas based on locational characteristics. The Subject Lands were a part of Area 4 (see **Figure 1**).

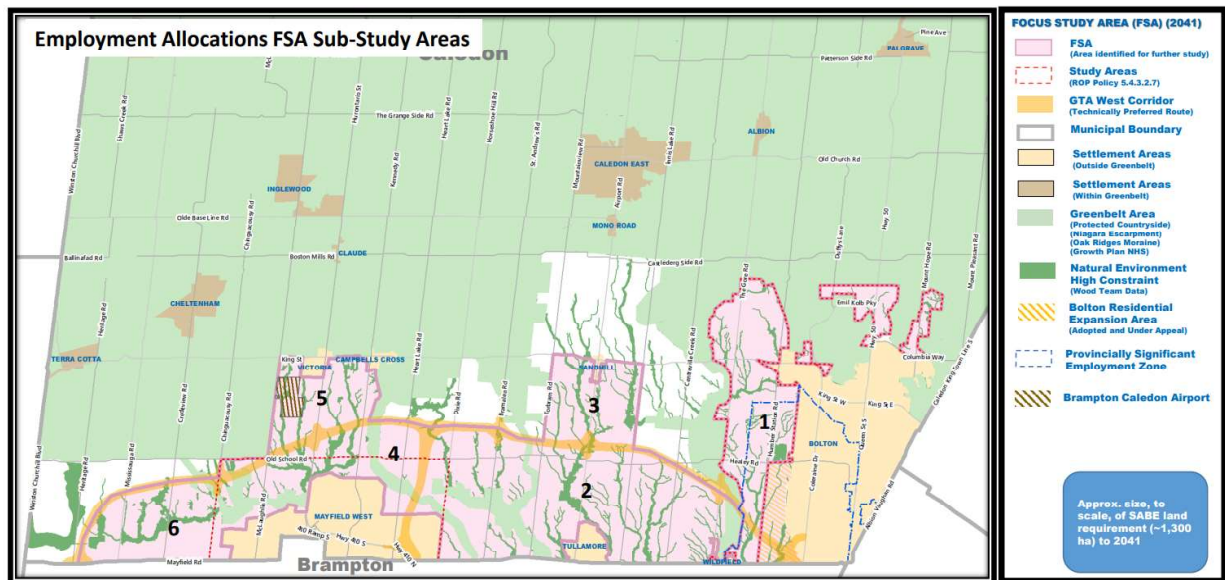


Figure 1: Employment Allocations FSA Sub-Study Areas | Source: Memorandum – SABS Study: Technical Studies Update

As part of this initial assessment, the consideration for employment opportunities and uses in the area were assessed and are summarized in the following chart which bolds key findings for the Subject Lands:

Area	Part 1: Employment Forecast	Part 2: Retail-Commercial Needs
Area 4: Mayfield West	Strong potential for near and long-term employment uses due to existing connection with HWY 410 and eventual GTA West Corridor	<ul style="list-style-type: none"> Planned population in Mayfield West will generate demand for new retail-commercial uses and potentially draw from other settlement areas in Caledon as well as north Brampton East-west portion of the GTA West Corridor that intersects with Highway 410 has excellent visibility and accessibility and is a good location for major retail-commercial development A major 1.2 million SF retail-commercial space including an enclosed mall and movie theatres (plus office, apartment, and hotel uses) is proposed in northwest Brampton and should be considered when siting future retail)

This assessment was important in relation to the Subject Lands as it provided the context for the lands in relation to the GTA West Corridor and Highway 410 extension as well as the Mayfield West Community and the potential for a range of land uses. It identified that the Subject Lands could provide for a full range of commercial and retail uses as part of a Community Area while the lands to the east could provide for opportunities for employment along the 410 corridor.

The purpose of the Hemson Consulting Planning Justification Report *Settlement Area Boundary Expansion Study: Concept Map and Technical Study Findings*, dated **December 10, 2020**, was to summarize the findings for the technical studies of the broad area in the southern part of Caledon and to assess the most appropriate location for new urban lands and the designation of those areas as Community Areas or Employment Areas. **Community Areas** are to include lands for residential, retail/commercial, and major office uses, which includes opportunities for employment uses. **Employment Areas** are to be provided to primarily accommodate manufacturing, warehousing, and logistic uses.

Based on the Hemson December 2020 report, the breakdown of areas was identified for the SABE Lands:

- Approximately 3,100 HA for Community Area
- Approximately 1,200 HA for Employment Area

The Subject Lands and most of Area 4 were proposed to be designated Community Area. This was based on the assessment and technical studies completed by the Region's expert consultants. In evaluating the Subject Lands as part of the Community Land designation around Mayfield West the Hemson Report noted the following:

"It is proposed that the expansion of Mayfield West to 2051 be generally framed by the GTA West Corridor. Community lands to the north-east would be configured to maximize the long-term protection of a significant cluster of farm operations centered on the intersection of Dixie Road and Old School Road."

The concept map identifies the following areas around Mayfield West for Community Land expansion based on the findings of the technical studies:

"Community lands to the immediate north and west of the existing settlement area, to be generally framed by the GTA West Corridor. This area constitutes the most substantial expansion area proposed for Mayfield West to 2051. The lands represent the logical extension of the settlement area and, while much of the area is agriculturally active, there is an ongoing transition to non-farm uses. The area is preferred from a transportation perspective, offering opportunities for sustainable transportation modes, lower congestion, and better road connectivity than other areas in the FSA. As well, the area is well positioned for water and wastewater servicing expansion."

The Subject Lands were clearly identified as an appropriate location for the expansion of the urban boundary and for a Community Area based on the technical studies and Hemson's planning justification.

Cedar City entered into an agreement to acquire Subject Lands on **April 5, 2021**. At that time, both the Subject Lands and the lands to the east across Heart Lake Road were included within the "Community Area" designation and shown on the Concept Map (see **Figure 2**) in the Hemson Planning Justification Report (dated December 10, 2020). Cedar City provided a submission to the Region in support of the **Community Area** designation for the Subject Lands.

SABE Concept Map (December 2020 version updated with ROPA 30 LPAT Settlement & Approved ROPA 34)

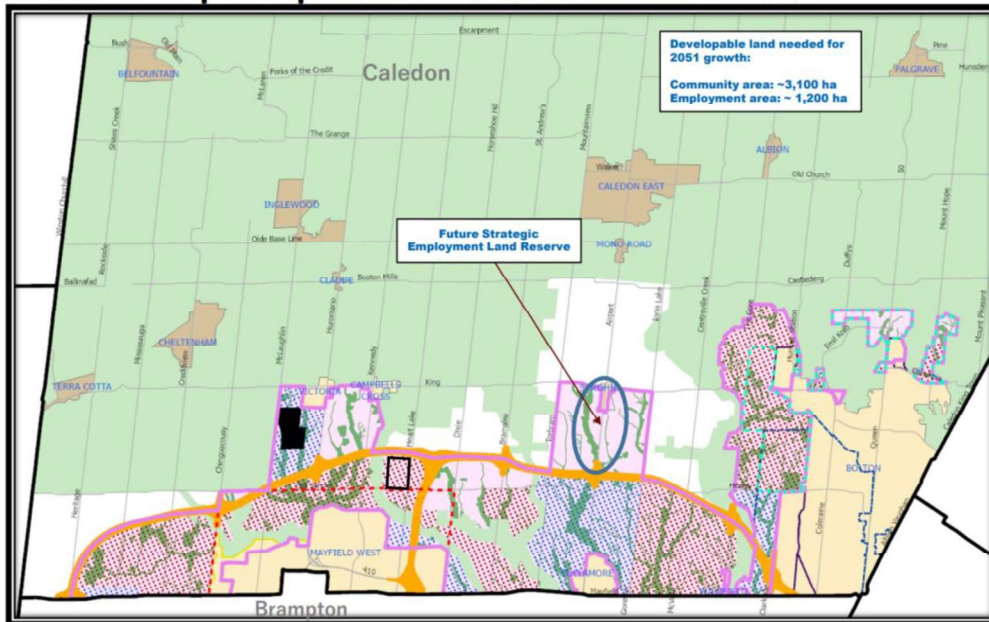


Figure 2: SABE Concept Map (December 2020) Source: Region of Peel Settlement Area Boundary Expansion (SABE)

LAND NEEDS ASSESSMENT

A Land Needs Assessment (LNA) is a critical assessment and study required by the Province, to be completed as part of an MCR. It is used to determine the required land supply to accommodate growth for forecasted population and employment.

Appendix 1 sets out the components of the LNA for both community area land needs and employment area land needs for reference.

As noted, based on the Land Needs Assessment, Hemson stated that the Region needed to achieve a population of 2.28 million residents and employment of 1.07 million jobs by 2051. The final LNA forecasts required a SABE large enough to accommodate 183,000 people and 67,700 jobs by 2051. The Land Needs Assessment report identified the following land need:

- *An additional 4,400 hectares of land would be needed to accommodate growth in the SABE to 2051*
 - *Approximately **3,000 hectares** would be required to support **Community Areas***
 - *Approximately **1,400 hectares** would be required to support **Employment Areas***

The Subject Lands were identified as a location appropriate to meet part of the 3,000 hectares of land required for Community Lands. It is important to note that the Community area designation is inclusive of future opportunities for a range of residential, commercial uses and mixed uses and would facilitate the opportunity for such uses at a key intersection/node location through the Subject Lands and allow for transition to the GTA West Corridor to the north.

In the updated Draft Recommended SABE Report and Final Concept dated September 2021, the Subject Lands were still justified and designated as **Community Area** whereas the lands across Heart Lake Road were revised and designated Employment Area (see **Figure 3**).

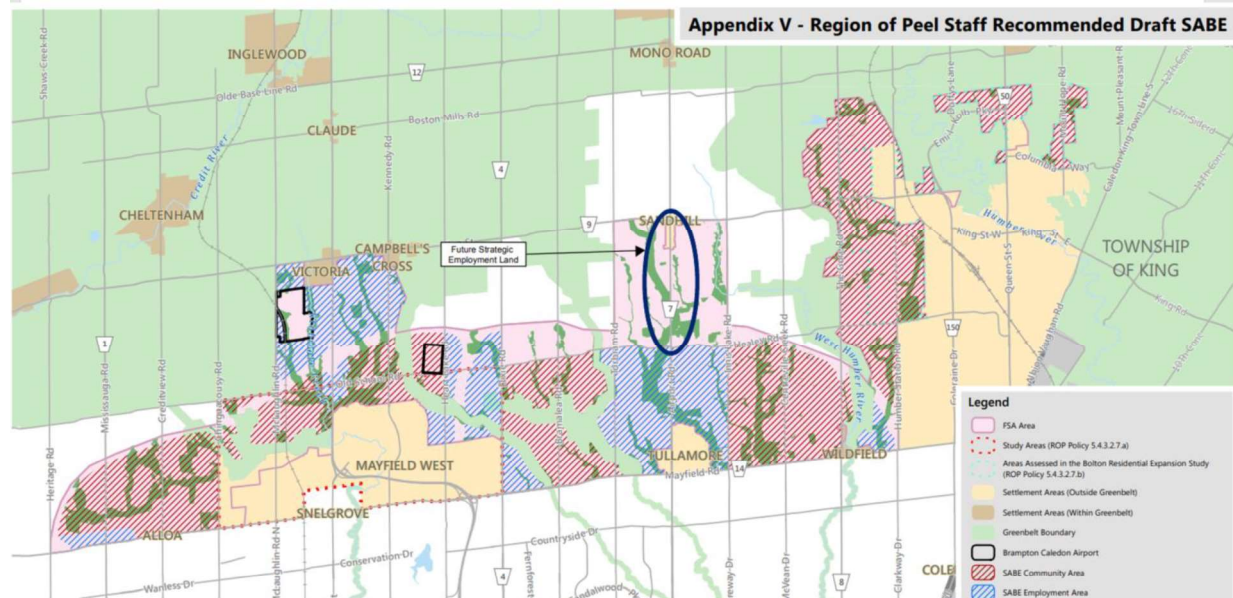


Figure 3: Draft Recommended SABE (September 2021) Source: Region of Peel Settlement Area Boundary Expansion (SABE)

The September report had identified the importance of the future extension of the 410 Highway and interchange with the future GTA West Corridor. The lands adjacent to the new Highway Corridor on the east side of Heart Lake Road were revised to **Employment** to provide for the development of the corridor area for a range of employment uses related to goods movement and industrial operations as well as major offices.

CALEDON OFFICIAL PLAN PROCESS

The Caledon Official Plan Review process has been underway for a number of years and subject to several background and technical studies as well as public consultation. The Town has also been engaged in the SABE process and recently provided comments on the Region's Final SABE concept map.

CALEDON OFFICIAL PLAN WORKSHOPS

On **October 4, 2021**, the Town of Caledon held a *Caledon Official Plan Council Visioning Workshop* to discuss the Region's Recommended SABE. The Subject Lands were identified as **Community Area** in this workshop.

On **November 23, 2021**, the Town of Caledon held another Caledon Official Plan Council Workshop with one of the topics of discussion being employment lands. The Town looked at the trends in employment, commercial and institutional uses to provide further policy direction for the Caledon Official Plan.

On **November 30, 2021** Town staff prepared a report (2021-0430) outlining its comments to the Region on Peel 2051 which included specific comments on SABE and the designated areas within SABE identified as Employment Area. The report noted the following:

"1,400 hectares of employment land have been identified within the SABE. The last expansion to employment lands in Caledon resulted in a ten-year employment land supply being purchased within approximately two years. The lands were not immediately developed due to the necessary studies, servicing and land use approvals. There was no "shovel-ready" and designated lands for attracting new businesses or retaining existing businesses. From an Economic Development perspective, the designation of closer to 1,700 hectares of employment land could help Caledon retain existing businesses, attract new businesses, and move towards a more balanced tax ratio. Town staff is requesting that Regional Council increase the amount of employment land in the SABE."

CALEDON SABE RECOMMENDED CHANGES

On **December 6, 2021**, the Town of Caledon submitted comments to the Region of Peel with recommended SABE revisions. The Town of Caledon staff stated that the distribution of Community and Employment Areas throughout the FSA could be improved and prepared a separate preferred concept to address their concerns (see **Figure 4**).

Modifications were recommended to the Region's September 2021 SABE map as follows:

- *Protection of the Provincially Significant Employment Zone in Bolton (a change from Community use as proposed by the Region);*
- *Introducing a Future Strategic Employment Reserve at the northern edge of the GTA West Corridor between Kennedy Road and Bramalea Road*
- *Changing the land use from Community Area to Employment Area on the south-east and south-west sides of the proposed Highway 410/GTA West Corridor*
- *Introducing additional Community Area along Old School Road between Dixie Road and Torbram Road*
- *Removal of Employment Area southwest of Campbell's Cross between Kennedy Road and Hurontario Street*

The Town's recommended SABE Revised Concept included a reduced amount of Community Area – approximately 2,800 ha compared to the Region's SABE of 3,000 ha and an increase to the amount of Employment Area from 1,400 ha to approximately 1,650 ha. The density of the Community Area was also proposed to be increased to 70 people and jobs per hectare to maintain the required population with a decreased land area.

Based on the proposed revised SABE concept map, the Subject Lands were now recommended by the Town as **'Employment Areas'**.

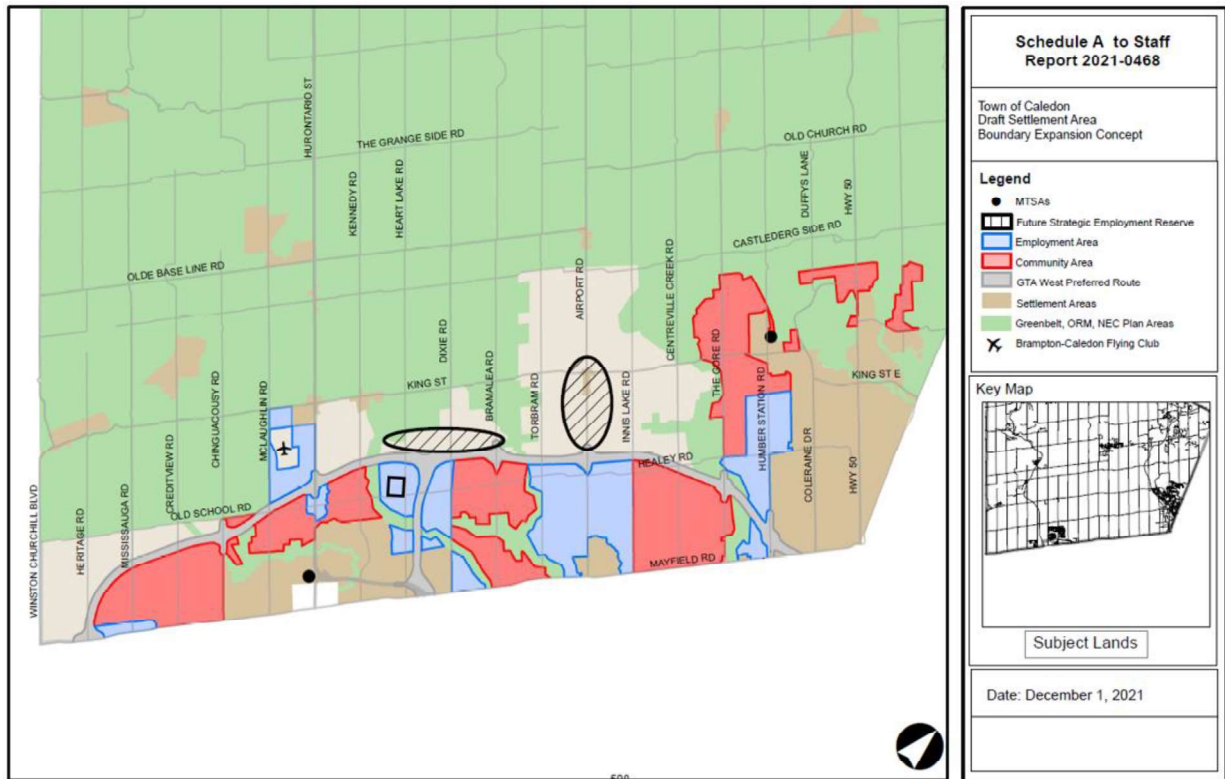


Figure 4: Town of Caledon Draft SABE Concept Source: Town of Caledon (December 1, 2021)

Town of Caledon Staff Report 2021-0468 states that the rationale for the removal of the Community Area lands was based on the following goals related to employment:

- The projected need for employment lands and historical absorption rate which Caledon has faced.
- Focusing employment uses adjacent to existing employment, along Highway 410 and the GTA West Corridor.
- Protection of the Provincially Significant Employment Zone per Provincial direction in A Place to Grow: Growth Plan for the Greater Golden Horseshoe.
- Protection of employment land for long-term uses.
- Seeking lands in excess of the Regional employment recommendation (1,400 ha) and the preliminary findings of the Town's Employment Strategy (1,400 ha) as discussed at Committee Meetings and Council Workshops, and striking a balance with the comments provided by Town Economic Development staff (1,700 ha), by identifying approximately 1,650 ha of Employment Lands and a further area of approximately 500 ha of land as a Future Strategic Employment Reserve.

The report then references the justification for the changes as provided in Staff Report 2021-0430. As illustrated earlier, this report has little if any assessment or justification other than a statement about past experience with the lack of "shovel ready" employment lands and the need for more supply.

On **December 13, 2021**, the Town of Caledon held an Official Plan Review Phase 2 Public Open House. This open house presentation addressed the following: Project Background & Planning Roles; Intensification Foundations; Town Structure Foundations; Question & Answer Period. The map shown in the presentation was the same as the proposed revised SABE Concept map where again the Subject Lands were identified as 'Employment Area.'

REGION OF PEEL COUNCIL MEETING FEBRUARY 2022

The Region of Peel Planning and Growth Management Committee met on **February 3, 2022**. Item 5.1 on the agenda entitled *Peel 2051: Official Plan Review and Municipal Comprehensive Review Comment Response Summary and Next Steps* was presented to Council. The comments from the Town of Caledon which recommended revisions to the Employment Area and Community Area mapping were included in the agenda package. The report however noted that ongoing discussions with the Town of Caledon related to employment lands in the Settlement Area Boundary Expansion be undertaken and that policies and mapping be updated based on the results of these discussions as appropriate.

Cedar City made a delegation at this meeting to convey their surprise and disappointment with the proposed changes and to request that further consideration be given to the proposed changes before any decisions were made.

The report also referenced a memorandum by Hemson completed on **January 17, 2022** that was **not** included in the Agenda, but which specifically reviewed and provided comments on the Town of Caledon requested modifications. The Hemson Memorandum outlined the implications of the comments on the LNA and concluded in relation to the September 2021 SABE:

"Our view is that the Regional staff recommended SABE achieves these goals and is supported by the SABE technical studies. Fundamental alteration of the recommended SABE in response to the Town's reconfiguration of employment areas is therefore not required."

Regional staff noted that they concurred that no changes to the LNA analysis, findings and recommendations are warranted based on the comments received. Regional staff went on to state in their Staff Report 2022-02-03 Report that they are recommending some revisions where requests can be supported based on alignment with Regional policies and interests and principles of good planning. The Region's response to the Town's request was as follows:

- *The amount of community and employment land proposed in the SABE has been justified through the results of the Provincially mandated LNA. Staff are not recommending changes to the LNA as evidence has not been provided that would suggest revisions are required.*
- *Although an increase in the density of the new settlement expansion greenfield area from a minimum of 65 people and jobs/ha may reduce flexibility for Caledon to plan communities at a variety of densities to transition to the rural area, an increase in the minimum density is consistent with many regional and provincial priorities. Based on the revised SABE map shown on Appendix II, staff are supporting a minimum density of 67.5 people and jobs per hectare. Increasing the minimum density to 67.5 people and jobs per ha reduces the Community Area land required by approximately 130 ha.*
- *The recommended Employment Area included in the LNA provides enough land for the 30-year planning horizon, and there is an opportunity to update the employment land needs at least every 10 years through subsequent MCRs. However, staff recognize that Provincial policy sets the LNA results as a minimum, and can support an increase in designated Employment Area on the basis of providing protection of additional lands for employment uses and that additional supply would provide a variety of competitive sites appealing to different potential users. These factors may better position Peel and Caledon to take advantage of uncertain future economic development opportunities.*
- *Notwithstanding the revisions proposed above related to Community and Employment Area, no overall increase in the SABE beyond the map dated September 2021 is supported by staff.*

Staff then supported revised changes to the SABE mapping as follows:

- “replacing approximately 109 ha of proposed Community Area north east of Mayfield West with proposed Employment Area
- replacing approximately 19 ha of proposed Employment Area on the south side of Old School Road at the intersection of Hurontario Street with proposed Community Area”

The updated map is provided in Report 2022-02-03 is as follows (**Figure 5**):

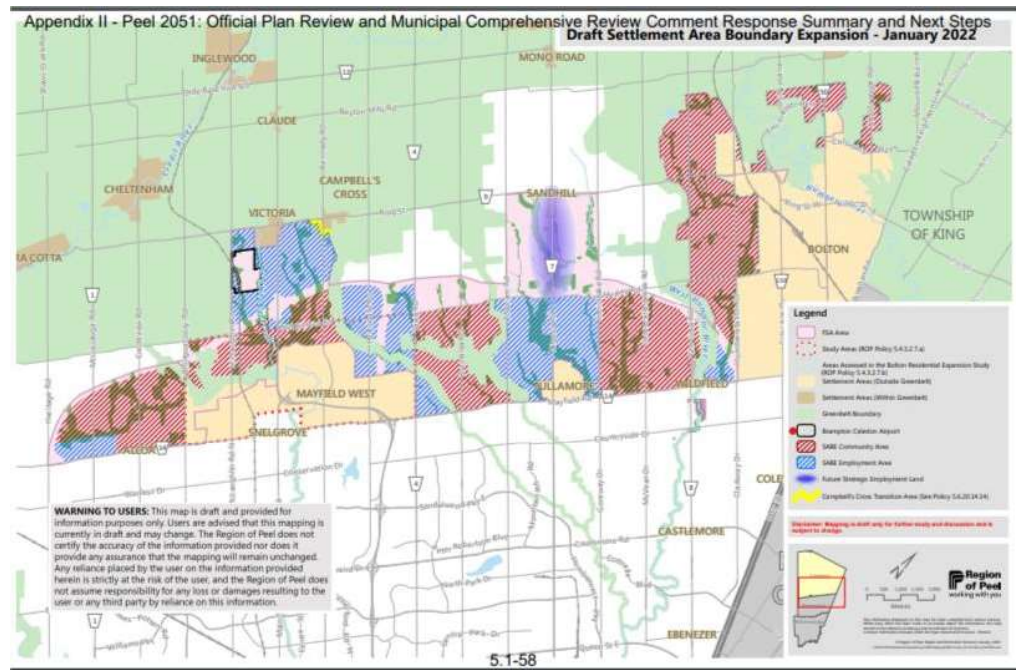


Figure 5: Draft SABE – January 2022 Source: Region of Peel

CALEDON OFFICIAL PLAN UPDATE – MARCH 2022

On **March 1, 2022** the Town of Caledon held a Council Meeting with respect to the Official Plan Review update. The Next Steps as outlined in the staff report include the following:

- Upon receiving Council direction, staff will proceed with releasing the proposed draft Official Plan on March 17, 2022. This will be followed by statutory consultation to engage and receive feedback from the public, community partners, agencies and organization.
- Following the Public Meeting, staff will seek further feedback from Council during the Official Plan Workshop on April 19, 2022.
- Staff will continue to consult with community partners and stakeholders as revisions to the plan are considered. An update on “what we heard” and an overview of proposed changes to the draft plan will be provided to Council and the public. Finally, the proposed final Official Plan is scheduled to be before Council for consideration in June 2022.

Since January 22, 2022, the report notes that the additional study by Watson & Associates, *Draft Employment Strategy* has been completed and will be presented at the March 22, 2022 meeting.

Watson & Associates developed the *Employment Strategy Report* for the Town of Caledon dated **February 25, 2022**. The report defines Community and Employment Areas as the following:

- **“Community Areas:** Areas where the vast majority of housing required to accommodate forecast population will be located, as well as the majority of population-related jobs, most office jobs and some employment land employment jobs. Community areas include delineated built-up area [B.U.A] and the designated greenfield area [D.G.A] (excluding employment areas).”
- **“Employment Areas:** Areas where most of the employment land employment (employment in industrial-type buildings) jobs are, as well as some office jobs and some population-related jobs, particularly those providing services to the employment area. Employment areas (including prime employment areas) may be located in both delineated built-up area [B.U.A] and the designated greenfield area [D.G.A].”

The Watson Employment Strategy Report identifies the 2051 Density Targets for Community Area and Employment Area SABLE Lands. It also notes the importance of the Goods Movement Sector and the link to this sector with the GTA West Corridor and the 410 Corridor. The report also identifies employment area opportunities and how employment area land is best utilized.

In relation to the Mayfield West area in general, the Watson Strategy speaks to the need to attract a range of sectors and uses based on its location and market attributes. The strategy speaks to the land to the east to provide for manufacturing uses where there is access to goods movement with the transition to residential uses to the west. The strategy highlights the importance of prestige employment areas at gateways and locations along the Highway corridor. It also speaks to the ability of the Community Areas to accommodate a broad range of employment uses. It concludes that the Town and Region should work together to proactively plan to 2051 **“based on the detailed LNA”**.

There is no direct reference to the removal of the Community Area designation on the Subject Lands and the need, as part of the Employment Strategy, to revise the Subject Land designation to an Employment Area. In fact, there is no justification for the revisions to the land areas as recommended in December Staff Report 2021-0468 by the Town in the Watson Report, albeit it was completed after the recommendations were made.

PART C – ASSESSMENT AND RECOMMENDED DESIGNATION AND POLICIES FOR THE SUBJECT LANDS

When the Subject Lands were acquired in April 2021, they were proposed to be designated as Community Area and had the client’s support for the designation. This designation was based on substantive review and assessment through the Region’s process. In 2021, the designations in the area were modified to reflect the opportunities for the area to the east of Heart Lake Road along the Highway 410 extension. A split in areas at Heart Lake Road is an appropriate transition to allow for clusters of specialized industrial and employment uses along the highway with residential and mixed use in the larger nodal area. Cedar City further expressed their support for these revisions in November 2021 after the release of the Recommended SABLE report in September 2021. The proposed designation of the Subject Lands remained as Community Area until December 2021 when the Town of Caledon requested more employment lands, changing the designation of the Subject Lands from Community to Employment Area.

The Caledon Official Plan review highlights the importance of allowing for the greatest flexibility for urban uses inclusive of mixed uses. Municipalities must carefully plan for employment uses to ensure large areas are not overly supplied and therefore fixed without the ability to adjust for five or more years.

Based on the location and context of the Subject Lands, the supportive technical reports completed to date by the Region and the Region's policies and good planning principles, we believe the Subject Lands are most appropriate to remain as a Community Area as part of the Urban Expansion Lands. Our opinion is based on the following:

THE COMPREHENSIVE REVIEW AND ASSESSMENT HAS BEEN COMPLETED BY EXPERTS RETAINED BY BOTH THE REGION OF PEEL AND TOWN OF CALEDON

- The process to date has been comprehensively and carefully considered throughout the Growth Plan requirements and policy directions. The Subject Lands were justified and supported as Community Lands through comprehensive technical review and assessment.
- The Region's SABE work involved technical studies that addressed: transportation, public health, public facilities, cultural heritage, archaeology, employment and commercial opportunities, agricultural impact, climate change, natural environment, and mineral aggregate resource impact.
- Hemson's (report January 2022) view is that the Regional staff recommended SABE achieves the goals and is supported by the SABE technical studies and the changes are not required nor were they recommended by Hemson ***"Fundamental alteration of the recommended SABE in response to the Town's reconfiguration of employment areas is therefore not required."***

EMPLOYMENT USES ARE PROVIDED IN THE PROPOSED COMMUNITY AREA DESIGNATION

- The Subject Lands maintained as Community Lands maintain an important community node to provide for a range of residential, employment and mixed uses. Community Areas can accommodate a far wider range of employment uses to support complete community development which is highly appropriate at nodal locations especially those offset from the major highway interchanges.
- Maintaining the Community Area for the Subject Lands maintains the principles of the Region's and Caledon's Official Plans for an urban focus as well as supporting strategic innovative economic opportunities.
- The Watson report identifies **Community Areas** as *"areas where the vast majority of housing required to accommodate forecast population will be located, as well as the majority of population-related jobs, most office jobs and some employment land employment jobs"* and **Employment Areas** as *"areas where most of the employment land employment (employment in industrial-type buildings) job are, as well as some office jobs and some population-related jobs, particularly those providing services to the employment area."* The employment related jobs are still very much supported and achievable within the Community area, without having to change the entire designation of the lands to Employment.

THERE IS AN APPROPRIATE TRANSITION TO THE PROPOSED EMPLOYMENT AREA AND TO MAYFIELD WEST

- The proposed Employment Areas to the east are more closely aligned with the type of and scale of uses to be provided adjacent to the highway corridor and are supportive of the Good Movement Sector. The Subject Lands, located on the west side of Heart Lake Road, maintained as Community area, maintains connectivity to the Mayfield West Lands and provides a transition to Employment area.
- The Hemson report (dated September 2021) states: *“the settlement areas of Bolton and Mayfield West remain the most suitable foundation for long-term growth of Community Lands in the FSA.”*
- Hemson (report January 2022) states that the Town’s proposal: *“though supported by the SABE technical background work in respect of Areas 2 and 3 does not fully consider the long-term implications of extending employment areas in those areas and potentially “stranding” residential communities to the east of Mayfield West.”*
- The Community area designation on the Subject Lands can provide for a transition towards the GTA West Corridor to the north through additional employment uses located along the corridor with a concentration of residential and mixed uses at the intersection.

PLANNING AND LAND USE JUSTIFICATION FOR THE RECOMMENDED CHANGES IS NOT PROVIDED

- There is no substantive planning justification for the removal of the Community area from the Subject Lands.
- Both the Hemson and Watson reports support the LNA budget for Community and Employment Areas and the distribution as shown on the Final Concept Map (dated October 2021).
- In regards to LNA, Hemson’s report states *“The Town proposed to include an additional 250 hectares of employment area in the SABE.” **“However, it is not clear whether the additional employment area is required to accommodate higher employment growth, or lower densities on employment areas, or provide for significant vacant lands in 2051 beyond what is assumed in the Region’s published LNA.”***
- Hemson (January 2022) reports states that the Town’s reconfiguration of Employment Areas is not required.
- Watson’s Employment Strategy report does not make reference to the Subject Lands or recommendations for changing the designation from Community to Employment Areas.
- The implications of the Town of Caledon’s proposed changes for the SABE Employment and Community Areas have not been assessed.
- The Region’s SABE September 2021 concept, continues to be supported by detailed technical analysis.

IMPLICATIONS OF THE CHANGES REQUESTED BY THE TOWN OF CALEDON FOR THE SUBJECT LANDS

The land needs analyses performed by both the Region’s and the Town’s experts provide no support for the proposed change from Community Area to Employment Area on the Subject Land:

- The September 2, 2021 Hemson SABE Study identified five areas appropriate for locating new employment areas in the SABE based on the Growth Plan policies and the principles and conclusions set out in the real estate market analysis and related technical studies. The Subject Lands were not identified as part of new employment areas in the SABE concept map.

- In their comments on the requested changes by the Town of January 2022, Hemson (report January 2022) stated that the Town's proposal *"would likely result in significant vacant lands being available in Caledon in 2051. The Region may wish to effect this in order to preserve a variety of employment land use options over the long-term. Nevertheless, there will be ample opportunity to update the LNA over the next 30 years to reflect actual employment area absorption rates and careful attention will need to be paid to the phasing of employment areas with the additional designated lands"*.
- Watson & Associates' report provides the followed density targets for Community Areas and Employment Areas SABLE Lands:
 - Community Areas: Growth Plan (2019) requires a minimum density of 50 people and jobs/ha; The Region of Peel is planning for an average of 67.5 people and jobs/ha within the Town of Caledon's Designated Greenfield Area
 - Employment Areas: The Growth Plan (2019) does not identify a minimum Employment Area density target; The Region of Peel is planning for a density of approximately 24.8 jobs/ha for Employment Area SABLE lands in Caledon.

The change in designation of the Subject Lands to Employment Area is not needed to achieve these targets.

- Revising the balance of lands allocated to Community and Employment areas without a supportive needs justification and land use analysis, can be expected to result in an oversupply of Employment areas with the corresponding negative impacts of an undersupply of Community Areas at a higher density and the loss of their related commercial and employment opportunities.
- From a land use and compatibility perspective, the change requested by the Town as it relates to the Subject Lands in particular results in a loss of the opportunity to create appropriate transitioning between the Employment Area and residential development to the southwest. In addition, the Community Area designation would allow for a more appropriate interface with the natural heritage features.
- The Employment Area designation will fix the land use planning framework for the Subject Lands without flexibility for a range of residential and urban mixed uses, which in our opinion, is highly inappropriate for the lands.

CONCLUSIONS

In our opinion, the Community Area designation is the appropriate and preferred designation for the Subject Lands, supported by the land needs analyses and relevant land use considerations, and represents good planning. The requested Employment Area designation is not appropriate for the Subject Lands from a land use perspective and is not supported by the land needs analyses.

For the reasons noted, we recommend the Subject Lands be retained as Community Area.

Yours Truly,

MHBC

A handwritten signature in black ink, appearing to read 'Dana Anderson'.

Dana Anderson, MA, FCIP, RPP
Partner

A handwritten signature in black ink, appearing to read 'A Skrzat'.

Aleksandra Skrzat
Planner

cc. Steven Silverberg, President, Cedar City Developments

Appendix A: Land Needs Assessment Components

The following are the components involved in the **community area land needs assessment** as identified in *A Place to Growth Plan for the Greater Golden Horseshoe – Land Needs Assessment Methodology for the Greater Golden Horseshoe (2020)*:

Population Forecasts

- A population forecast by age group based on the forecasts contained in the Plan (or an alternate growth scenario developed by the municipality)

Housing Need

- Through the use of household formation rates and propensities for multiple families to occupy particular dwelling types, the population forecast is converted into a forecast of households by type of dwelling.
- The number of households by dwelling type in the base year is subtracted, yielding forecasted household growth by dwelling type to the Plan horizon
- Household growth by type is adjusted for many factors, including but not limited to:
 - The units added since the land needs assessment base year;
 - The replacement of units that will be lost (e.g. demolitions, other uses);
 - Changes in the level of vacancies;
 - Market contingency factors; and
 - Other mitigating factors;
 - And other mitigating factors
- The end result is the forecast of total housing need by dwelling type

Housing Needs Allocation

- The projected housing need can be allocated among the lower-tier municipalities (if applicable). If allocating, upper-tier municipalities should, in consultation with lower-tier municipalities and the public, make the allocation among the municipalities based on such factors as the planned urban structure, housing affordability, a mix of housing types, servicing capacity and the potential for intensification.

Housing Supply Potential by Policy Areas

- Municipalities must determine potential housing supply in the delineated built-up area, designated greenfield area, and rural lands, including rural settlements.

Community Area Jobs

- Utilizing the assessment of the employment area land needs, municipalities must prepare an inventory of employment lands for population related jobs and most of the major office in meeting the applicable density targets to achieve complete communities.

Need for Additional Land

- Housing Supply is deducted from the forecasted housing need. Additional housing by type required beyond the existing supply is converted to a land requirement by applying appropriate densities that include population-related employment allocations.
- Conformity with the intensification and designated greenfield area density targets is confirmed or adjustments are made to ensure conformity with the Plan. This may require adjusting the mix of housing types while ensuring the provision of a market-based supply of housing to the extent possible. For the purposes of alternative intensification and designated greenfield area density targets, the ability to provide a market-based supply of housing is an important consideration in determining whether a target can be achieved.

- The end result is the amount of additional land (if any) to be designated for new community area through expansion of the settlement area. In the case of outer ring municipalities, the community land needs assessment may also determine that there are excess lands in which policy 2.2.1.6 applies.

The following are the components involved in the **employment area** land needs assessment as identified in *A Place to Growth Plan for the Greater Golden Horseshoe – Land Needs Assessment Methodology for the Greater Golden Horseshoe (2020)*:

Employment Forecasts

- Upper-and single-tier municipalities will forecast employment using Schedule 3 forecasts or alternate growth scenarios as a minimum as well as the North American Industry Classification System (NAICS) by usually place of work, no-fixed workplace within the municipality and work at home.
- Structuring employment forecasts into the four primary land use categories:
 - **Employment land employment** (warehousing/manufacturing jobs supported by good movement corridors, and freight and airport infrastructure);
 - **Population-related employment** (supports the service needs of residents);
 - **Major office** (found in office parks and strategic growth areas supported by transit and urban amenities); and,
 - **Rural-based jobs** (may be within rural settlement but otherwise outside of settlement areas related to natural resources, agriculture, tourism and recreation).

Employment Allocation

- Allocate jobs by type to the different geographies

Existing Employment Area Potential

Need for Additional Land

- Determine the need for additional employment area