



February 28, 2019

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Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5

ATTENTION: Charles O'Hara, Director, Growth Policy, Planning and Analysis

Re: Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017 (ERO #013-4504)
Proposed Modifications to O. Reg. 311/06 (Transitional Matters – Growth Plans) (ERO #013-4505)
Proposed Framework for Provincially Significant Employment Zones (ERO #013-4506)
Proposed Modifications to O. Reg. 525/97 (Exemption from Approval – Official Plan Amendments) under the *Planning Act*, 1990 (ERO #013-4507)

Please accept this letter in response to the Environmental Registry of Ontario - ERO 013-4504, ERO 013-4505, ERO 013-4506 and ERO 013-4507. The Town of Caledon is appreciative of the opportunity to provide initial comments on the above ERO postings. Additional or modified comments may be forthcoming upon receipt of this letter to Town Council in early March.

The Town recognizes the efforts the Province has made by providing opportunities for additional consultation on proposed Growth Plan modifications through the technical working group sessions held in the fall of 2018, and the Regional Roundtables held earlier this month. Staff recognize that many of the proposed changes are a direct result of feedback collected in the fall. Further clarification of proposed policy changes at the Roundtable in February was valuable in preparation of these comments.

We encourage the Province to continue to provide opportunities for municipal staff to liaise and comment on provincial initiatives that directly impact local communities.

Overall, the Town supports the direction of the proposed policies that would allow for a more flexible and logical planning process.

The Town supports the Province's aim to address barriers to building homes, creating jobs, attracting investments, and protecting the environment and agricultural land, but have concerns with some of the proposed policy changes, while other policies require further clarification.

Our comments are outlined under the key themes of the proposed amendments/modifications:

Intensification and Density Targets

The Province has proposed increasing the intensification target from the phased target of 50% to 2031 and 60% thereafter, to 60% from the next Municipal Comprehensive Review. The immediate increase to 60% raises concerns with developing a housing mix that addresses demographic needs and realizing the market shift to medium and higher density forms of housing. A more planned approach to ensure appropriate servicing is in place is achieved with a phased target as per the current Growth Plan.

The proposed change in Designated Greenfield Area (DGA) from 80 to 60 people and jobs per hectare responds to previous comments provided by the Town of Caledon and the Region of Peel. This density reflects an opportunity for compact complete communities, while recognizing that higher order transit is not likely to be available in some new DGA areas and building denser communities on the edges of existing settlements would pose many challenges. The Town historically has had difficulty achieving the higher densities and the Province could consider a lower target such as 50 for the Town due to its rural character and transitional placement between the cities to the south (at 60) and more rural areas to the north and west (at 40). Therefore, a target of 50 residents and jobs combined per hectare may be more achievable and appropriate in our community.

Settlement Area Boundary Adjustments

The proposed policies would provide an opportunity for settlement area boundary expansions outside of an MCR, which corresponds to some of the Town's previous comments regarding a staged approach to the MCR. Staff would be supportive of small expansions occurring outside of an MCR, provided they are accounted for at the MCR stage.

Staff recommend that expansions would need to be regional or municipally initiated.

The proposed threshold of 40 hectares should be reconsidered. Providing a specific area is problematic and it should be based on a logical boundary expansion through a municipally led process subject to the same rigorous technical requirements that would be undertaken during the time of settlement expansion in the full MCR process. The area for expansion must be based on technical and fiscal requirements to avoid piecemeal planning. The Province should consider establishing specific criteria and policies that would create logical settlement boundaries expansions to support complete and viable communities.

As previously noted to the Province, the advancement of Mayfield West Stage 2 Phase 2 (110 hectares) is an example of a logical settlement boundary expansion that should proceed outside of the MCR process. Allowing Mayfield West Phase 2 Stage 2 to proceed would introduce a range and mix of housing supply, provide employment opportunities, support complete communities and provide a logical extension to the community. The technical MCR work has already been completed demonstrating the merits of these expansion areas.

Rural Settlements

Proposed Amendment 1 introduces the new Rural Settlement term to replace undelineated built-up areas. This is a positive change as it recognizes the nature of these communities, and the minor levels of growth expected.

The proposed policy that would allow minor rounding out of rural settlements in keeping with the rural character of the area is supported by staff. This is viewed as a tool available to municipalities and would be considered under the right circumstances. This could allow for flexibility for rural settlements and provide opportunities to strengthen the existing community. The policy permitting minor adjustments should require any adjustments be municipally initiated.

Planning for Employment

The proposed framework provides additional flexibility in terms of employment lands, allowing for municipalities to designate and convert employment land outside of an MCR. Further clarification is required regarding the criteria for designating employment land outside of an MCR. The Town is supportive of these policies as they would allow for the municipality to be more adaptive to local employment needs. It is recommended only municipalities be permitted to initiate employment land conversions outside of an MCR.

The creation of provincially significant employment zones for greater protections of important employment sites will ensure protection in the long term. The Ministry should consider how future infrastructure will be considered in the identification of Provincially Significant Employment Zones, around the GTA West Corridor. Zone 15 includes lands along Highway 50 in Bolton, though these boundaries should be modified to reflect current land use designations, including the Coleraine West Employment Area which came into effect on May 11, 2016. The Town's proposed Provincially Significant Employment Zone boundaries for Bolton are included (See Appendix 1), and mapping shapefiles are also included with our submission.

Major Transit Station Areas (MTSA)

The proposed Amendment 1 would allow for MTSA boundary delineation to be advanced prior to an MCR which is supported by the Town.

Section 2.2.4.1 of the Growth Plan references Schedule 5, which identifies priority transit corridors. It is noted that Schedule 5 is not proposed to be changed. This schedule identifies existing higher order transit and committed Go Transit rail extensions. The Go Rail extension to Bolton should be identified on this schedule.

Agricultural and Natural Heritage Systems

Proposed Amendment 1 would introduce transition policies for the Growth Plan area agricultural and natural heritage mapping that was released February 2018. Staff are supportive of the transition policies, which would not bring the mapping into effect until a Regional Official Plan Amendment implements the policies. This allows municipalities to refine the system and proceed with applications that were underway when this mapping came into effect. However, the transition policies should apply to the entire system, not just mapped areas within the Growth Plan.

Consideration should also be given to the review of the Oak Ridges Moraine Conservation Plan policies that prohibit on-farm diversified uses on lands designated Natural Linkage/Natural Core. The uses permitted within the Natural Core and Natural Linkage areas could also be reviewed to consider additional uses, in order to promote economic activity. The Town of Caledon has significant agricultural and tourism-based industries, and residents and businesses find it challenging to operate under the existing policy framework. The Town would like to strengthen these industries and help support viable operations within the community but cannot do so without further provincial policy changes.

Population and Employment Forecasts

The population and employment forecasts identified on Schedule 3 are the basis for the implementation of the Growth Plan policies to direct and manage growth. These forecasts are to be reviewed every 5 years in accordance with Section 5.2.4.7 of the Growth Plan.

The Town of Caledon, in cooperation with the Region of Peel, have been using the 2041 population and employment forecasts on Schedule 3 in order to achieve the Growth Plan, 2017 conformity date. The Region can proceed with the adoption of a growth management amendment, including input from a land needs assessment, well in advance of the 2022 compliance deadline. The Town recommends that the current planning horizon and forecasts be maintained so that technical work that has already been completed to date is not lost.

The Town is supportive of the policies that would allow for certain components to be brought forward as separate amendments as part of the Municipal Comprehensive Review, and not as one amendment package. By allowing a staged approach to municipal comprehensive reviews, employment opportunities would be made available sooner, and provide increased housing supply and range of housing types. The proposed policy changes would allow certain sections of the Growth Plan to proceed outside of an MCR, but these sections would be subject to appeal. This could result in significant delays, rather than progress forward.

Additional Comments

The Province is reviewing several projects and plans that directly impact planning in Caledon, and the Greater Golden Horseshoe. The Town is directly impacted by reviews of the *Planning Act*, Provincial Policy Statement, Growth Plan Amendment 1, review of Growth Plan population and employment forecasts, GTA West Environmental Assessment, and the Regional Structure Review.

Recent communications from the Minister of Municipal Affairs and Housing suggested municipalities consider an interim pause on planning decisions or reviews of major planning documents. Respectfully, the Town is currently initiating its formal review of its Official Plan – a document that was created in the late 1970's and systematically updated over the years. This document requires a complete review which will be undertaken concurrently with the provincial conformity review. This process is lengthy and complex, and in order to meet prescribed Planning Act timelines the Town does not support an interim pause of the process.

The Town requests that the Province expedite the review of the above noted projects, and allow municipalities to proceed with greater certainty, and meet the Growth Plan conformity deadline.

If you have any comments or require clarification, please do not hesitate to contact the undersigned.

Sincerely,



Peggy Tollett
General Manager, Community Services
TOWN OF CALEDON

c: Mayor and Members of Council
Mike Galloway, Town of Caledon
Region of Peel

Attachments: Proposed Revisions to Provincially Significant Employment Zones (PSEZ) - Caledon
Mapping File for Proposed Revisions to Provincially Significant Employment Zones (shapefiles)