



**IBI GROUP**  
200 East Wing – 360 James Street North  
Hamilton ON L8L 1H5 Canada  
tel 905 546 1010  
[ibigroup.com](http://ibigroup.com)

October 31, 2019

Ms. Britta Patkowski  
GTA West Project Team  
AECOM  
105 Commerce Valley Drive West, 7<sup>th</sup> Floor  
Markham, ON L3T 7W3

Dear Ms. Patkowski:

**GTA WEST CORRIDOR ROUTE PLANNING  
PUBLIC INFORMATION FEEDBACK  
CLIENT PROPERTY - MAYFIELD WEST EMPLOYMENT LANDS**

We are planning consultants to Mayfield Road Portfolio Inc. ("MRPI") and Heart Lake Road Portfolio Inc. ("HLRPI"), owners of the 'subject lands' (as shown on the figure attached) located within the designated Mayfield West Employment Area of the Mayfield Community pursuant to Provincial, Regional and Local planning instruments. On behalf of our client, we have, over the course of the GTA West study, attended many PIC's and written to the Project Team on many occasions expressing our client's significant concerns, concerns shared by the Town of Caledon, with respect to a highway route corridor that, as currently proposed, would take approximately 120 acres of development-ready employment lands out of the Town and Region's employment land inventory. This letter reiterates our concerns in this regard and offers some discussion and questions with respect to the "technically preferred route" which also significantly impacts natural heritage lands.

In 2008, our client made rezoning and draft plan of subdivision applications for the majority of the HLRPI lands, and for all of the HLRPI lands consistent with the applicable planning regime at that time. In 2012, the HLRPI subdivision application was draft approved, as was the rezoning application. These applications were not appealed to the (then) Ontario Municipal Board ("OMB") by any party and are currently still in full force and effect. Several months later, the MRPI applications were brought forward for approval, the zoning was approved by Town of Caledon Council, however, it was then appealed to the OMB by MMAH on behalf of MTO. MTO shortly thereafter initiated their GTA West study and "froze" all of the HLRPI and MRPI lands from development in the interim.

Over time, including late in 2017, the Province released portions of the MRPI lands from the GTA West Corridor Study Area and withdrew their companion appeal of the ZBLA. Accordingly, the prestige industrial zoning for portions of the MRPI lands (as well as the zoning of the HLRPI lands as previously mentioned) is now in full force and effect and construction on the MRPI lands has commenced. A total of over 1 million square feet of employment floor space is either constructed or under construction and a total of over 500 jobs have either been created or will be created as a result. That same potential exponentially exists for the balance of our client's lands now planned for a highway.

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The subject lands are within the Section 5 Assessment and Evaluation area, and is impacted by Alternative Routes S5-5 through S5-12. The potential alignment through this has a large footprint and would affect the socio-economic potential for the area as well as natural heritage.

### **Socio-Economic Impacts**

As part of the Draft Plan Approved Subdivision, over 5,000,000 square feet of industrial development was approved within the Mayfield West (Phase 1) Employment Area which would result in hundreds of jobs to the Province of Ontario. Alternative Routes S5-5 through S5-12 would result in the loss of 118 acres (47.7 hectares) of draft plan approved Prestige Industrial land and roughly 2,300,000 square feet of building area. This loss would be detrimental to not only the landowner, but to the Town of Caledon and the Region of Peel and their employment forecasts going forward. Moreover, the government of the Province of Ontario has preached a “development- ready” platform for years. What message does it send to prospective owners, tenants, investors and businesses when zoned and draft approved lands are taken out of production by the Province?

In terms of value and cost to the Province, acquiring the HLRPI draft approved and zoned lands would be at least triple that of the agriculturally zoned lands on the west site of Heart Lake Road. Land value alone would make the preferred route the least cost effective option in this general area. As time progresses, the value of these lands will only increase and at a much faster and steeper rate than that of the agricultural lands.

### **Natural Environment Impacts**

The Mayfield West Employment Lands contain many woodlands and wetlands that, if any one of Alignment Alternatives S5-9 through S5-12 were approved, would be entirely removed. It would be our opinion that further consultation should occur with the Town, Toronto and Region Conservation Authority (“TRCA”) as well as the Ministry of Natural Resources and Forestry (“MNRF”) regarding the impact of such removals. According to MNRF mapping, and confirmed through the subdivision process, there are 3 large parcels of Provincially Significant Woodlands in the immediate area of HLRPI and MRPI’s lands within the preferred route, two of which also include Provincially Significant Wetlands. All three areas are also designated ‘Protected Countryside’.

Having gone through the planning process for a Draft Plan of Subdivision, individual site plans, as well as a Development Agreement for watermain and sanitary sewer extensions, our applications faced many challenges surrounding the appropriate retention, buffering and mitigation to woodlands and the wetlands on the subject lands. Given the level of effort at the subdivision and site plan level that has gone into the protection of natural heritage features, it is our view that the complete elimination of entire woodlots and wetlands as a result of the technically preferred corridor is completely inappropriate. By removing what we know to be the Heartlake Gardens Woodlot and the Henry Wetland, the overland conveyance route from the TRCA woodlot to the north would also be significantly compromised. Based on our estimates a total loss of 12.16 hectares of woodlot/wetlands would result, within the HLRPI lands alone.

Given the technically preferred route significantly impacts development-ready employment lands, results in the removal of substantial natural heritage lands, and adversely affects the hydrologic function of other natural heritage lands, we are asking, again, that a route alternative to the west of Heart Lake Road, which would avoid all of the above, be further considered.

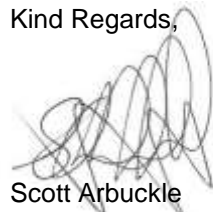
Moreover, there seems to be no thought of efficiency in the establishment of the technically preferred route – it literally slices right through the middle of the HLRPI lands leaving remnant, undevelopable strips on either side. Coupled to this, we understand from discussions with members of the Study Team at the last PIC (October 3, 2019) that the current corridor width is

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230 meters. This is to be refined to 170m in the final preferred option. Given both of the above, if it remains the Study Team's intent to continue to pursue a route option over the HLRPI lands, at a very minimum there should be serious consideration given at this time to rationalizing the route alignment, moving it as far east as possible and at the same time shrinking it to the bare minimum possible – 170m or less – so that the Town can salvage at least a portion of the key Heart Lake Road frontage for Prestige Industrial employment development.

The elimination of the significant woodlots, the impact to significant wetlands and the loss of prime employment lands from this area are serious concerns that should not be ignored through this EA. We hope that consideration will be given to what we have presented and that other options may be explored. We thank you for the opportunity to provide feedback and we look forward to your response and what changes can be made going forward.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Scott Arbuckle', is positioned above the printed name.

Scott Arbuckle  
Director | Office Lead  
**IBI Group**

Cc: Mayor Allan Thompson (via email)  
Don Darroch (via email)  
Jim Dymont (via email)

# MAYFIELD WEST EMPLOYMENT LANDS

For Illustrative  
Purposes Only

- UNDER CONSTRUCTION
- GTA WEST REFINED STUDY AREA
- CONCEPTUAL INTERCHANGE FOOTPRINT
- BUILT & OCCUPIED
- EXISTING ROAD
- PHASE 2 PROPOSED ROAD
- WOODLOTS/ WETLANDS/ OPEN SPACE
- STORMWATER MANAGEMENT
- PROPOSED WATERMAIN

## BUILDING AREAS (approximate)

HLRPI (Heart Lake Road Portfolio Inc.)

1,210,000 ft<sup>2</sup>  
444,000 ft<sup>2</sup>  
140,000 ft<sup>2</sup>  
158,000 ft<sup>2</sup>

MRPI (Mayfield Road Portfolio Inc.)

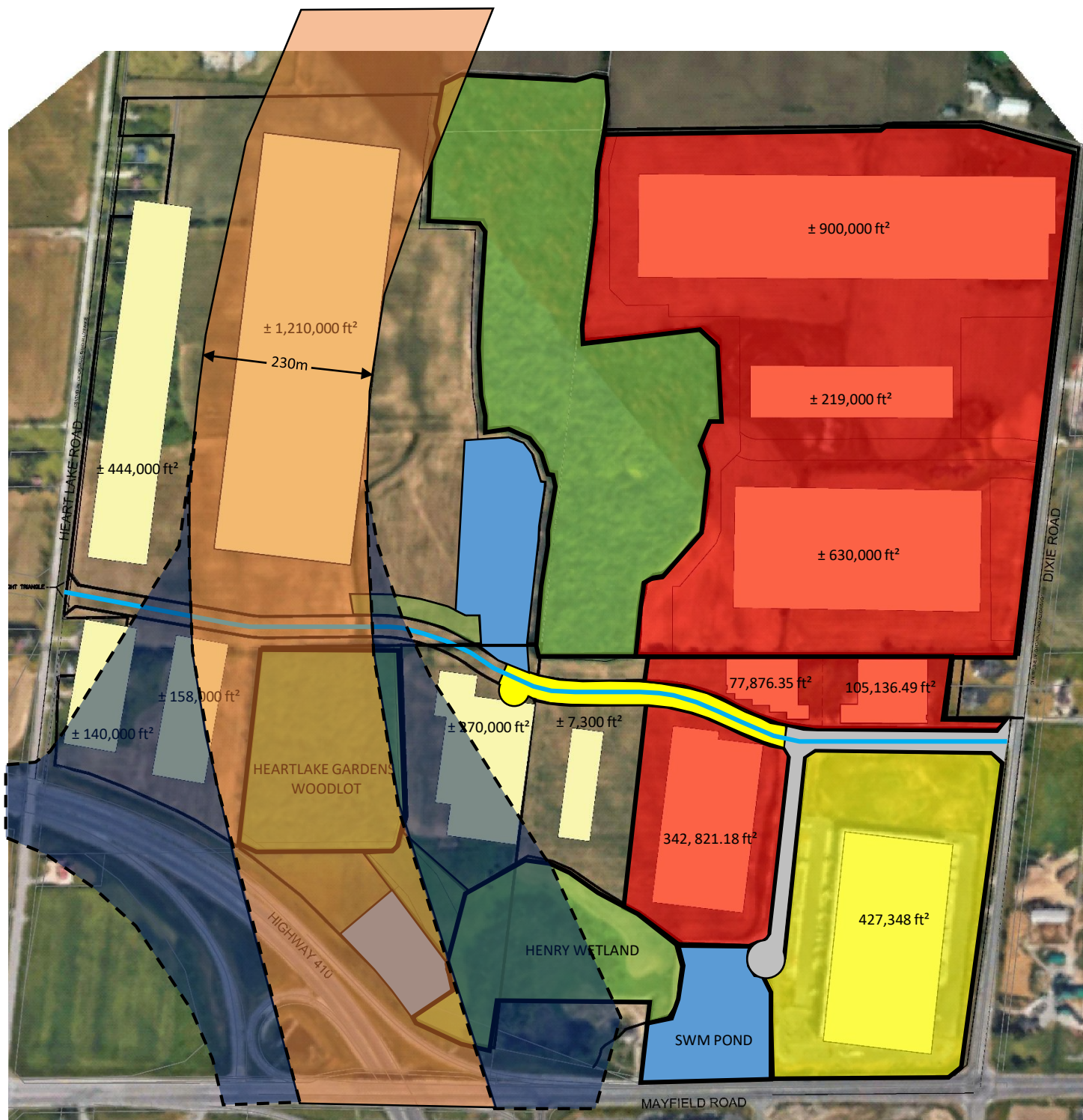
270,000 ft<sup>2</sup>  
7,300 ft<sup>2</sup>  
342,821.18 ft<sup>2</sup>  
77,876.35 ft<sup>2</sup>  
105,136.49 ft<sup>2</sup>  
427,348 ft<sup>2</sup>

PROLOGIS

900,000 ft<sup>2</sup>  
219,000 ft<sup>2</sup>  
630,000 ft<sup>2</sup>

TOTAL BUILDING AREA (approximate)

± 4,932,000 ft<sup>2</sup>



October 30th, 2019