



Project No. 1619

May 19, 2021

Members of Regional Council  
10 Peel Centre Drive,  
Suite A and B,  
Brampton, ON L6T 4B9

REFERRAL TO \_\_\_\_\_  
RECOMMENDED  
DIRECTION REQUIRED \_\_\_\_\_  
RECEIPT RECOMMENDED ☒

Dear Members of Regional Council:

**Re: Draft Settlement Area Boundary Expansion (SABE), Bolton, Ontario**

Please accept this letter further to our correspondence to Regional Council dated December 9, 2020 concerning the Draft Settlement Area Boundary Expansion (SABE), Bolton, Ontario.

As referenced in our letter, we are the land use planners to the Bolton North Hill Landowners Group (BNHL) who are landowners within the Option 1 lands and the southerly portion of the Option 2 lands in north Bolton (see **Appendix A**) (BNHL Lands).

As per our previous correspondence, it is our opinion that the entirety of the BNHL Lands should be included to complete the build out of Bolton outside of the Greenbelt Area boundary. The development pattern of Bolton has historically occurred to the north and bordered either side of Highway 50, which was further bolstered by the ROPA 30 approval. The inclusion of the remainder of the Option 1 lands would continue this intention by “filling out” the remaining portions of land suitable for residential development and supporting the historical Bolton commercial main street.

This approach is better suited to establish an improved corridor condition and a more desirable planning pattern resulting in a complete community. The inclusion of the remainder of these lands would result in a more cost effective and efficient delivery of Regional infrastructure and services as compared to including only a small portion of the lands that were added through ROPA 30.

Since our letter to Regional Council dated December 9, 2021, we have now had the opportunity to further evaluate the engineering solutions and synergies between Options 1, 2 and 3 in north Bolton. Given this additional information, we can now confirm that we are supportive of including all the lands in Options 1 and the “SABE Community Area Lands” portion of Option 2 as indicated in the figure below.

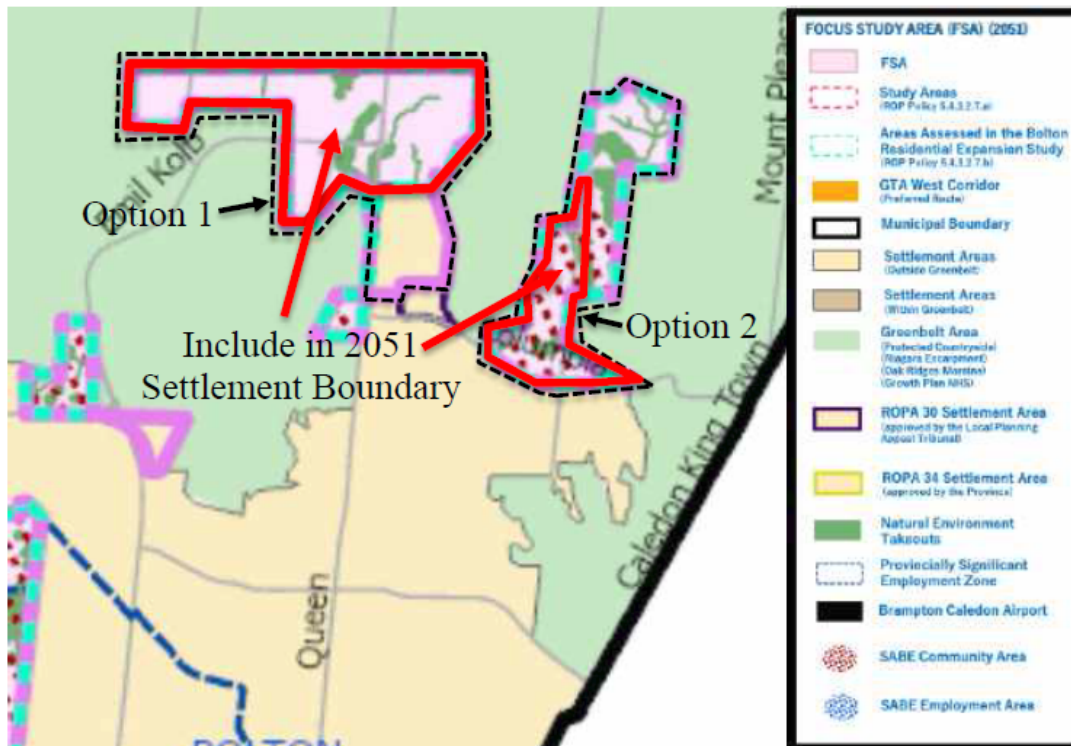


Figure 1 – Lands Requested to be Included in 2051 SABE Boundary

In summary, these lands should be included in the Bolton Urban Settlement Boundary for the following reasons:

- We believe it is appropriate to include the lands north on Highway 50 given that servicing is coming from the northwest toward the east to service the ROPA 30 lands needed to meet 2031 forecast population. The inclusion of all the BNHL Lands into the SABE will support the cost recovery for infrastructure required to service the ROPA 30 settlement on both the Option 1 and 3 lands. The BNHL have maintain their commitment to front ending the costs for any such expansion.
- The lands approved through ROPA 30 are required to be serviced. Building out the lands identified in Figure 1 above makes good financial and engineering sense in relation to what will already be undertaken to service the ROPA 30 approved lands.
- The growth of north Bolton onto the Options 1, 2 and 3 lands results in many financial and engineering synergies, including a more efficient implementation of water pressure zone 7.

- Expanding for a complete community in north Bolton also takes advantage of the investment in the Emil Kolb Parkway, providing a direct vehicular and bicycle linkages between the BNHL Lands and the future GO Station on the Option 3 lands, which development has now been confirmed by way of both the ROPA 30 approval and the recent Minister's Zoning Order.
- Expanding north is consistent with the historic pattern of residential growth in Bolton, providing new growth in close proximity to existing community facilities, emergency services and the historic main street commercial area which would benefit from nearby population in north Bolton (see **Appendix B** - Context Plan). New development in north Bolton would also have no potential constraints due to Highway 413.
- The BNHL Lands in north Bolton are some of the only lands surrounding Bolton that were not considered Prime Agricultural by the LEAR Study. The attached detailed letter from an Agricultural consultant confirms that there is no agricultural linkages in this area (see **Appendix C** – Letter from Orion Consulting). There is no reason in our opinion to exclude residential growth on the BNHL Lands based on retaining any agricultural linkages.
- All landowner parties to the recent LPAT hearing respecting ROPA 30 support the full inclusion of the Options 1 BNHL Lands and the "SABE Community Area Lands" and a portion of Option 2 in the 2051 urban boundary.

Furthermore, it is noted that the 2051 forecasts of the Growth Plan are provided to ensure there is sufficient supply of land to meet the population forecasts and are not a maximum or "cap". In this respect, it is my opinion that all of the lands indicated in Figure 1 to this letter should be included within the SABE to complete the build out of the lands surrounding Bolton and outside of the Greenbelt Area.

At this point in time the BNHL will continue to review the relevant materials and studies that informed the proposed SABE boundaries. It is our understanding that Peel Region remains open to feedback and these documents will be revisited in Spring 2021. In the interim, we remain open to any further discussions with the region and associated parties involved.

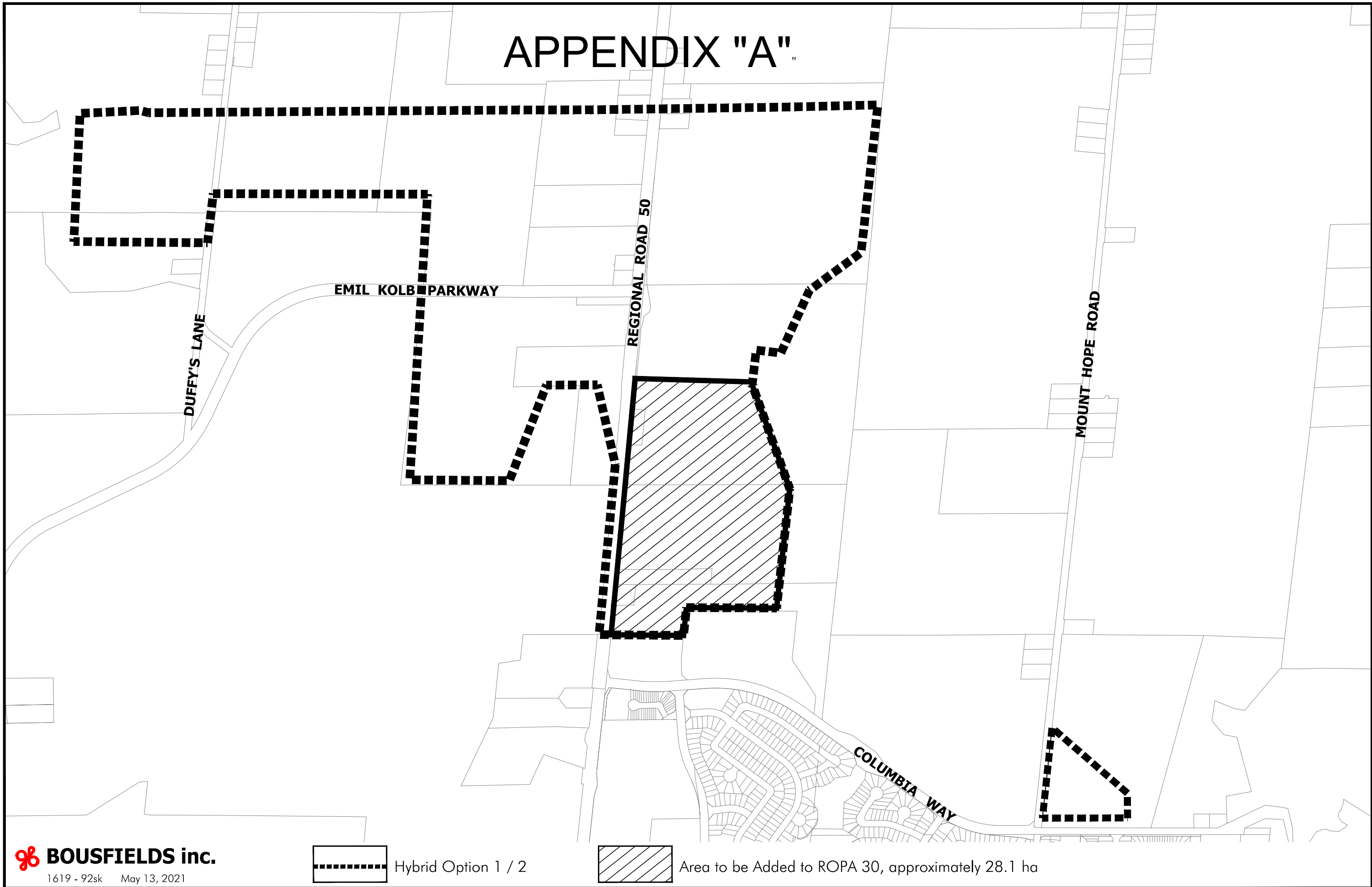
Sincerely,  
**Bousfields Inc.**



**Michael Bissett, MCIP, RPP**

c. Landowners  
Adrian Smith  
Ed Sajecki

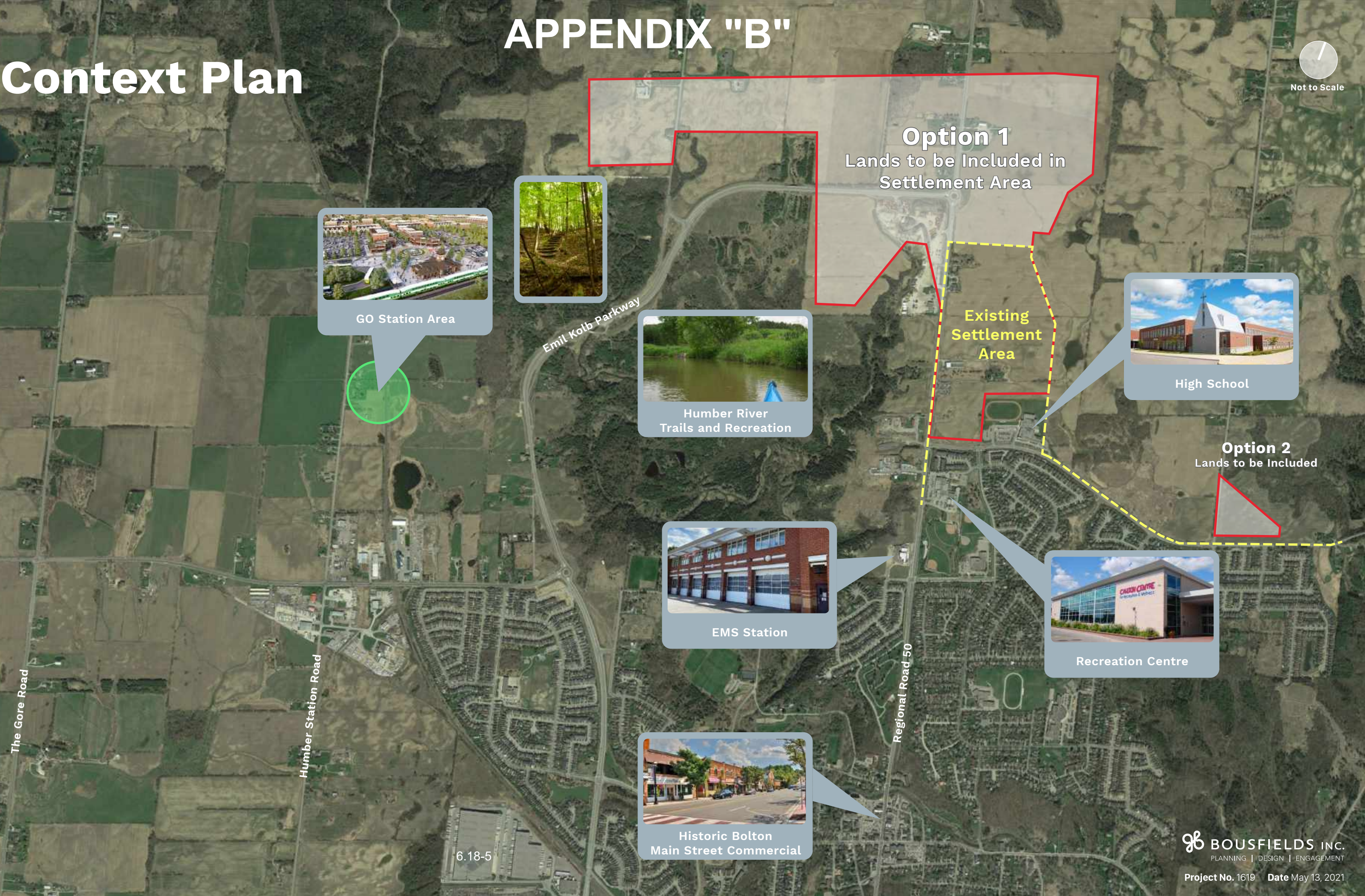
# APPENDIX "A"



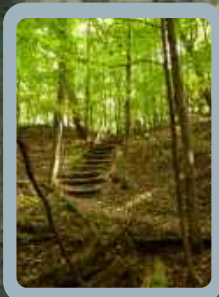


# Context Plan

## APPENDIX "B"



GO Station Area



Humber River  
Trails and Recreation

High School

EMS Station

Recreation Centre

Historic Bolton  
Main Street Commercial





# APPENDIX "C"



March 23, 2021

OEC 17-043

Members of Regional Council  
10 Peel Centre Drive,  
Suite A and B,  
Brampton, ON L6T 4B9

Attention: Dear Members of Regional Council:

**Re: Region of Peel 2041+ Official Plan Review  
Agricultural Review of the Settlement Area Boundary Expansion  
Study (Hemson December 2020)**

Dear Members of Regional Council:

Orion Environmental is pleased to provide our review of the findings of the Settlement Area Boundary Expansion Study: Concept Map and Technical Study Findings (Hemson December 10, 2020) and the related report entitled Preliminary Agricultural Impact Assessment – SABE (Planscape November 6, 2020). The purpose of this review is to comment on the proposed Settlement Area Boundary Expansion (SABE) Community Area as shown in Map 8 of the aforementioned report (copy attached) as it relates to the lands in north Bolton referenced through the BRES process as the Hybrid Options 1 and 2 lands (the "BNHL Lands") (see Attachment A - Map of the BNHL Lands). The Planscape report identifies the BNHL Lands as Area 1 in Figure 8 to that report (see attached excerpt).

Our findings are based on our review of these recent reports as well as and on the agricultural impact assessment we undertook for the alternative Bolton Expansion Areas as part of the Appeal of ROPA 30.

In reviewing Map 8 of the SABE report they are completely ignoring the results of the 2041 Regional Official Plan Review Agricultural Mapping Refinement Peel 2041 (November 2019). This study applied the provincial Land Evaluation and Area Review (LEAR) methodology for the assessment of agricultural lands with the participation of the agricultural community and it confirmed that the BNHL

Lands are not recommended by the Region to be designated prime agricultural lands. The LEAR study Map 8 – Draft Recommended Prime Agricultural Area Designation and Map 9 – Prime Agricultural Area To Be Added & Deleted is attached hereto as Attachment “B”.

The SABE study recommended the northerly portions of BNHL Lands not be included in the SABE Community Area in order to provide an agricultural landscape linkage with the City of Vaughan. However, the BNHL Lands were found to be too fragmented based on the LEAR agricultural assessment methodology and have been recommended to be removed from the provincial prime agricultural land base for the Region. The agricultural analysis undertaken by Orion for these lands confirmed the findings of the LEAR study.

The Planscape study concluded that the northerly portion of the BNHL Lands provides strong links to the surrounding agricultural community which support normal farm practices over the long term between Peel and York Regions. The report appears to conclude this landscape linkage is required to maintain and strengthen the rural character of the area. Review of the report found no explanation of what agricultural components must be present to define an agricultural linkage between the two Regions. Nor is there any explanation of how this perceived linkage will support the continuation of normal farming practices over the long term.

Review of the Ontario Ministry of Agriculture, Food and Rural Affairs report, Implementation Procedures for the Agricultural system in Ontario’s Greater Golden Horseshoe March 2020 identified the agricultural inputs and services required for the agricultural system. The inputs listed were mechanical services, equipment dealerships, feed mills, seed/fertilizer/feed suppliers, grading/packing/distribution facilities, custom operators, large animal veterinarians and crop and nutrient management consultants.

Based on our field studies as part of the ROPA 30 appeal, the aforementioned inputs are not found in the area to any significant extent. Farm equipment dealerships and associated mechanical services are centred in the larger farming areas beyond the urban hinterland. Feed mills and seed/fertilizer/feed suppliers are not prevalent in the adjacent rural areas of Vaughan, nor is their close proximity a requirement for economic sustainability. Feed mills from Kitchener- Waterloo supply farmers throughout central Ontario. Fertilizer and seed suppliers and crop management consultants are not reliant on a landscape linkage to effectively

services their clients. Large animal veterinarians no longer have a significant client base in the area because of the lack of livestock operations and the expansion of cash cropping.

Therefore, based on this report we can find no basis for the SABE report or Planscape report maintaining a rural landscape linkage through the BNHL Lands, which are the only NON-prime agricultural lands surrounding Bolton, for the long-term viability of the agricultural system.

The aforementioned OMAFRA report references two studies: the 2015 Friends of the Greenbelt Foundation commissioned study, *The Agricultural System: Components, Linkages and Rationale*, and the Ontario Federation of Agriculture and Environmental Defense report *Farmland at Risk: Why Land-use Planning Needs Improvements for a Healthy Agricultural Future in the Greater Golden Horseshoe* (December 2015).

The Greenbelt Foundation study referenced linking the six elements of the agricultural system: farms, natural environment, government, agribusiness, technical/professional expertise and non-profit/community sector to establish an economically viable agricultural system. The only elements that benefit from geographic close proximity are farms and agribusiness.

We have confirmed that agribusinesses are lacking in the adjacent Vaughan lands so in our opinion there is no need for any linkage. In addition, the agricultural lands that are part of the landscape linkage recommended by the Planscape report in the City of Vaughan are of a lower quality than the agricultural lands to west of Bolton and are significantly impacted by rural estate development and hobby farms with limited evidence of viable livestock or cash cropping operations.

The Ontario Federation of Agriculture study on land use planning for a healthy agricultural infrastructure recognizes that rural lands are part of the agricultural system but does not state landscape linkages are required for an economically sustainable agricultural system. The study does state the land base is the core of the agricultural system. The SABE recommendation to exclude the northerly portion of the BNHL Lands, which are fragmented LEAR designated non-prime lands north of Bolton is not supported by the OFA report.

Therefore, we can find no requirement for the landscape linkage of the BNHL Lands to the City of Vaughan agricultural lands to ensure the economic viability of

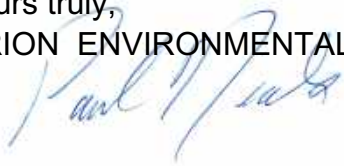


the area in either of the aforementioned studies addressing linkage in agricultural communities.

In conclusion, we cannot find any rationale from an agricultural viability perspective for the SABE recommendation to require the fragmented NON-prime lands in on the BNHL Lands to be retained due to its landscape linkage to the rural lands in Vaughan. The viability of agricultural lands relies on retaining the continuous high capability agricultural lands as defined by the Peel LEAR study.

Thank you for providing Orion with the opportunity to work with you on this project. If you have any questions or require further information, please do not hesitate to call.

Yours truly,  
ORION ENVIRONMENTAL SOLUTIONS, INC.



Paul Neals, B.Sc. Agr., P.Ag.  
Principal

PCN:

CC: Michael Bissett, Bousfields Inc.

# ATTACHMENT "A"

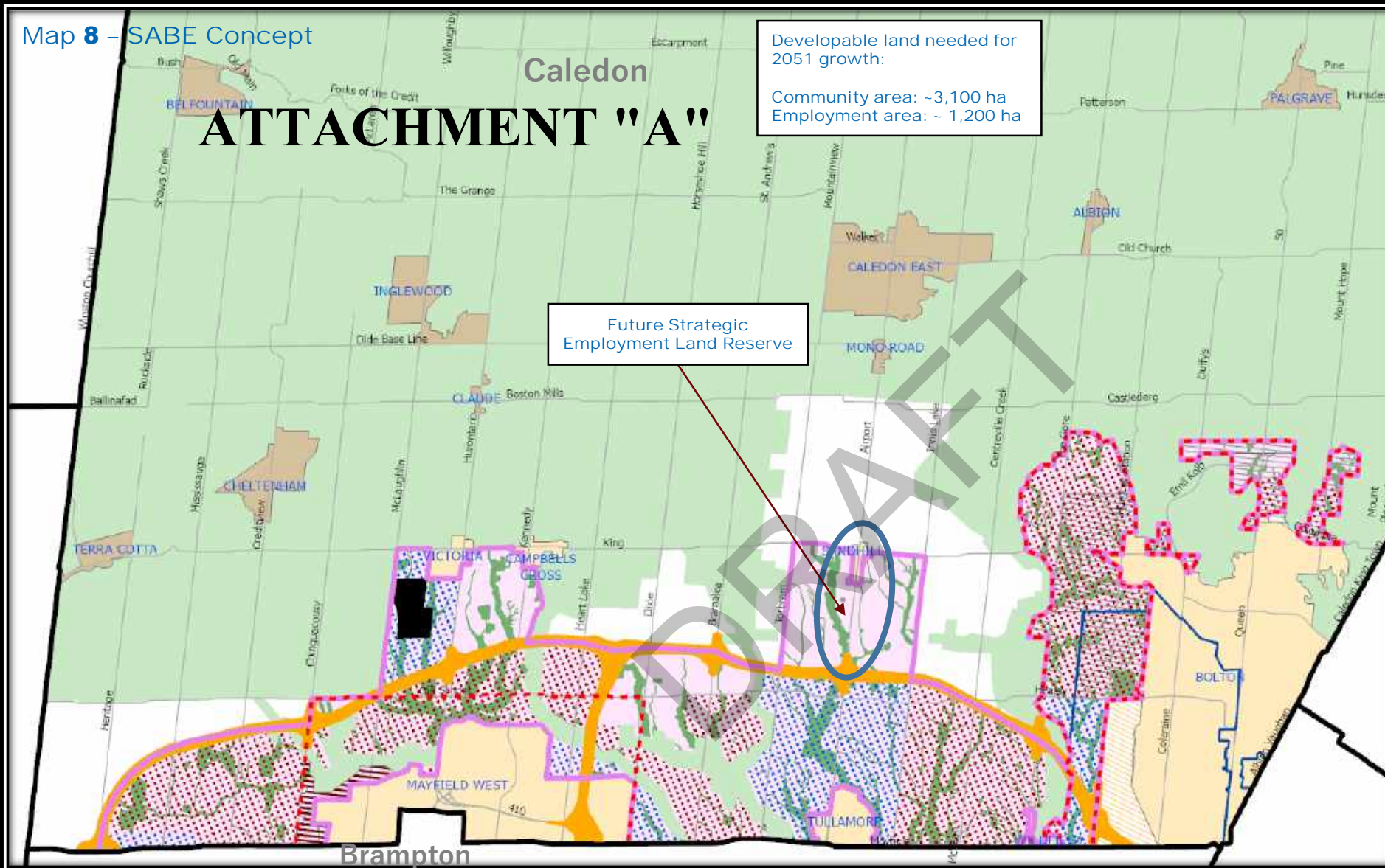
Developable land needed for 2051 growth:

Community area: ~3,100 ha  
Employment area: ~ 1,200 ha

Future Strategic  
Employment Land Reserve

## FOCUS STUDY AREA (FSA) (2051)

- FSA
- Study Areas  
(ROP Policy 5.4.3.2.7)
- GTA West Corridor  
(Technically Preferred Route)
- Municipal Boundary
- Settlement Areas  
(Outside Greenbelt)
- Settlement Areas  
(Within Greenbelt)
- Greenbelt Area  
(Protected Countryside)  
(Niagara Escarpment)  
(Oak Ridges Moraine)  
(Growth Plan NHS)
- Natural Environment  
Takeouts
- Bolton Residential  
Expansion Area  
(Adopted and Under Appeal)
- Bolton Residential  
Expansion Area  
(Other Areas Studied)
- Mayfield West  
(Phase 2 Stage 2  
proposed by ROPA 34)
- Provincially Significant  
Employment Zone
- Brampton Caledon Airport
- SABE Community Area
- SABE Employment Area



**Disclaimer:** This map has been developed for the Settlement Area Boundary Expansion (SABE) Study and represents a conceptual area for the SABE based on technical studies.

For additional information, please refer to the technical studies at <http://www.peelregion.ca/officialplan/review/focus-areas/settlement-area-boundary.asp>

**Notes:**

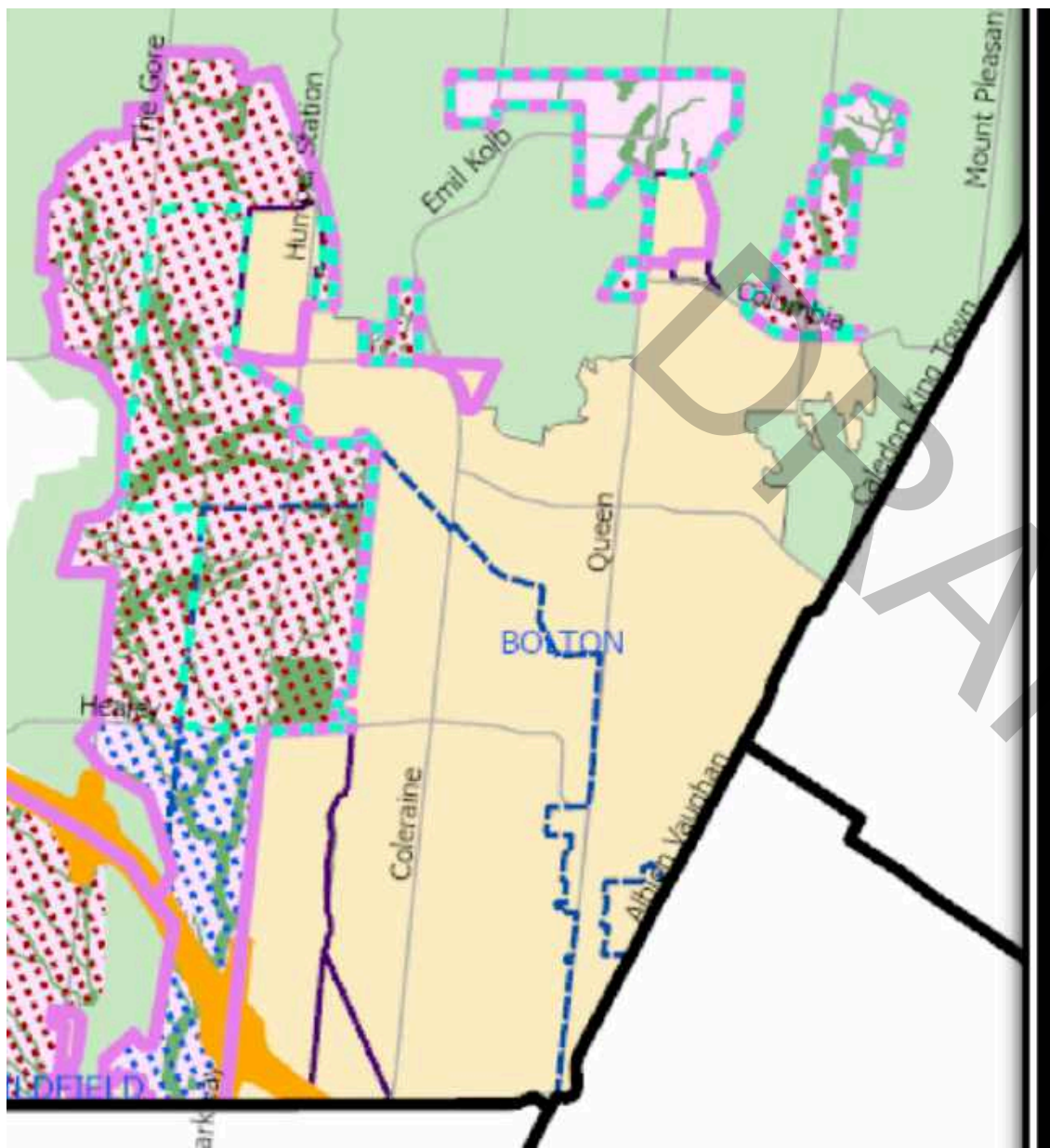
- 1) Other natural environmental constraints not identified on this map, including potential restoration lands, will be identified through further analysis and may further limit development.
- 2) ROP Policy 5.4.3.2.7 as it relates to the area surrounding Bolton is under appeal.
- 3) The ~4,300 ha SABE is based on a draft land needs assessment which is under review.

**DISCLAIMER: Draft  
conceptual SABE for  
further study and  
discussion.**



1 cm = 1 km





(Niagara Escarpment)  
(Oak Ridges Moraine)  
(Growth Plan NHS)



**ROPA 30 Settlement Area**  
(approved by the Local Planning  
Appeal Tribunal)



**ROPA 34 Settlement Area**  
(approved by the Province)



**Natural Environment  
Takeouts**



**Provincially Significant  
Employment Zone**



**Brampton Caledon Airport**

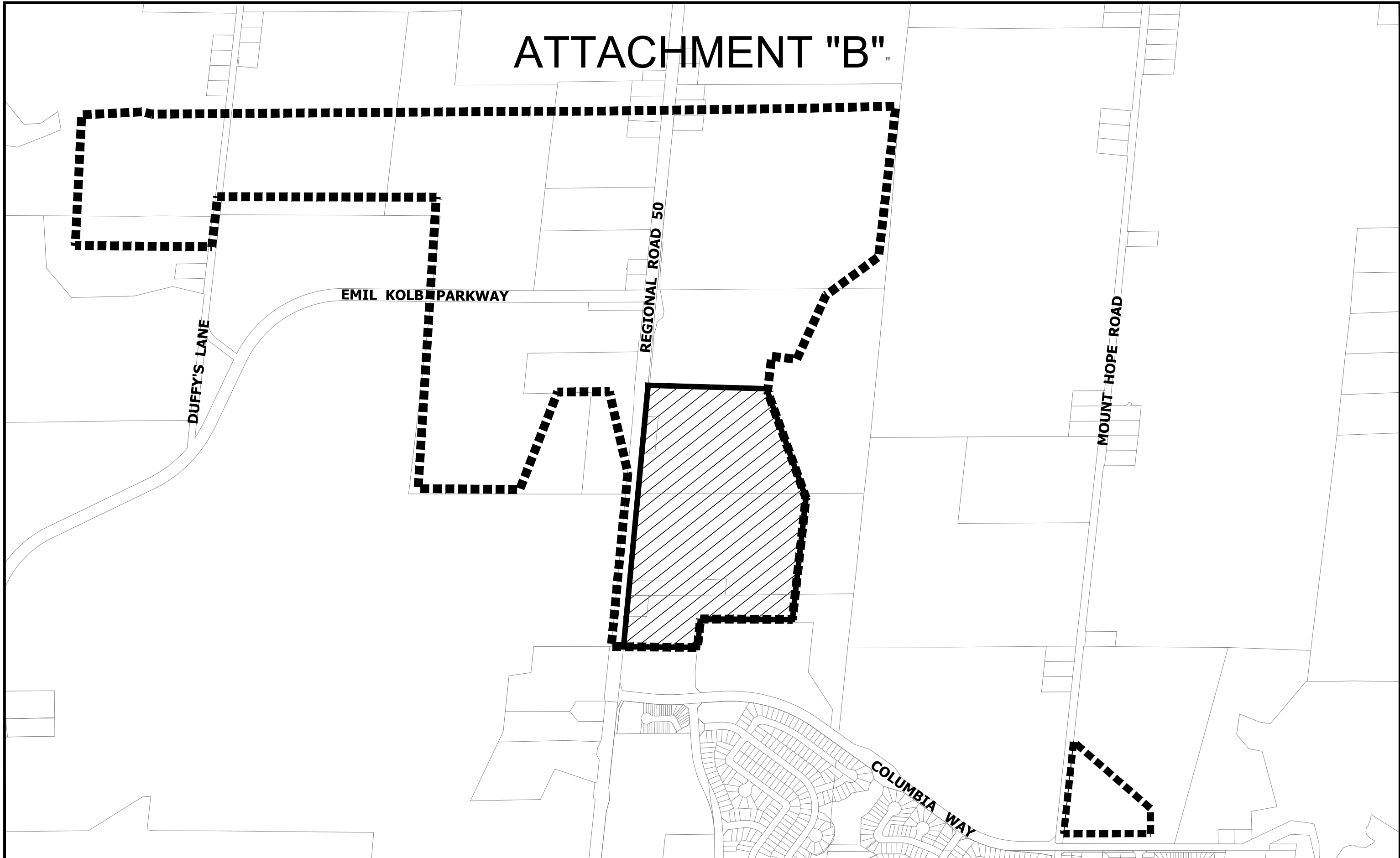


**SABE Community Area**



**SABE Employment Area**

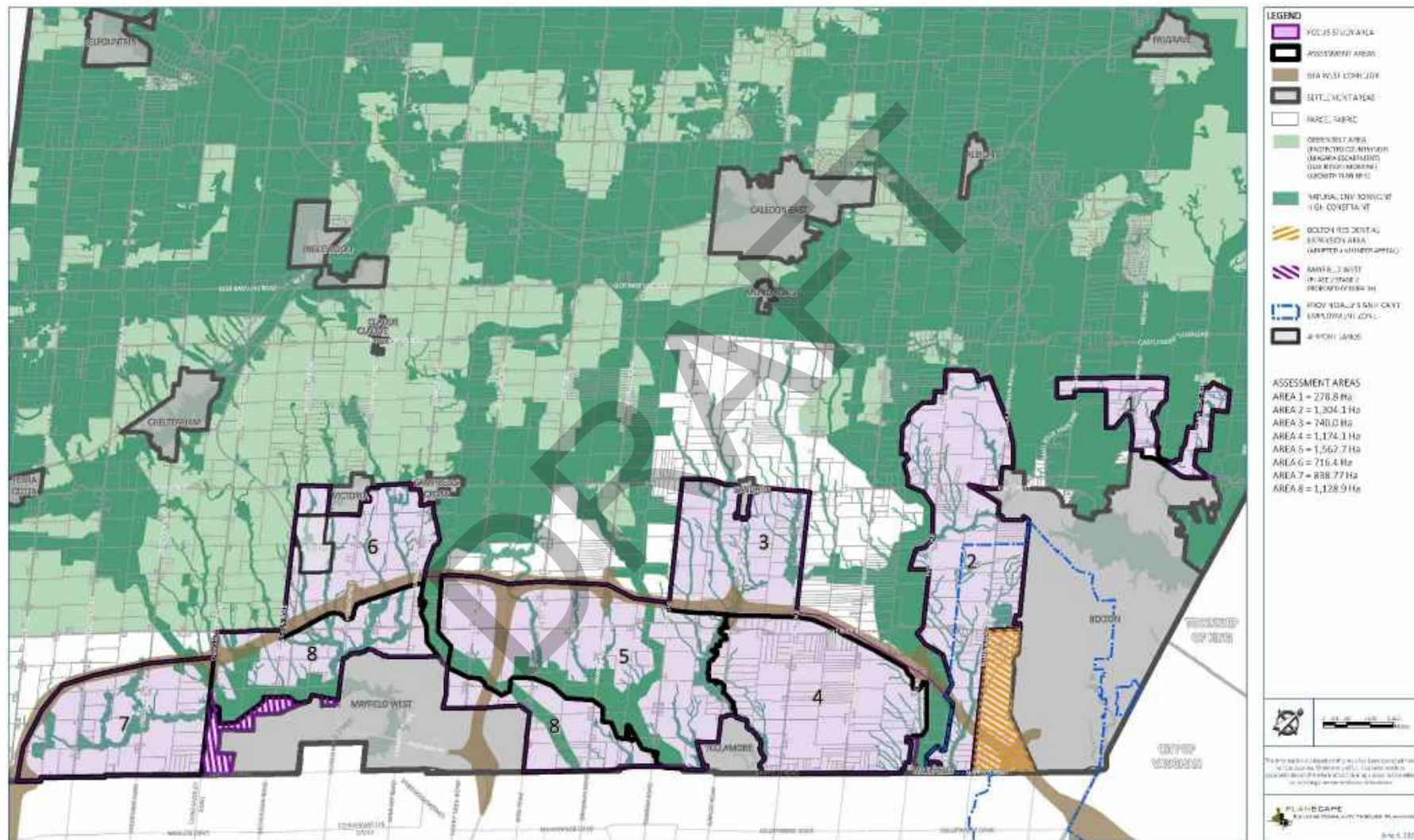
# ATTACHMENT "B"





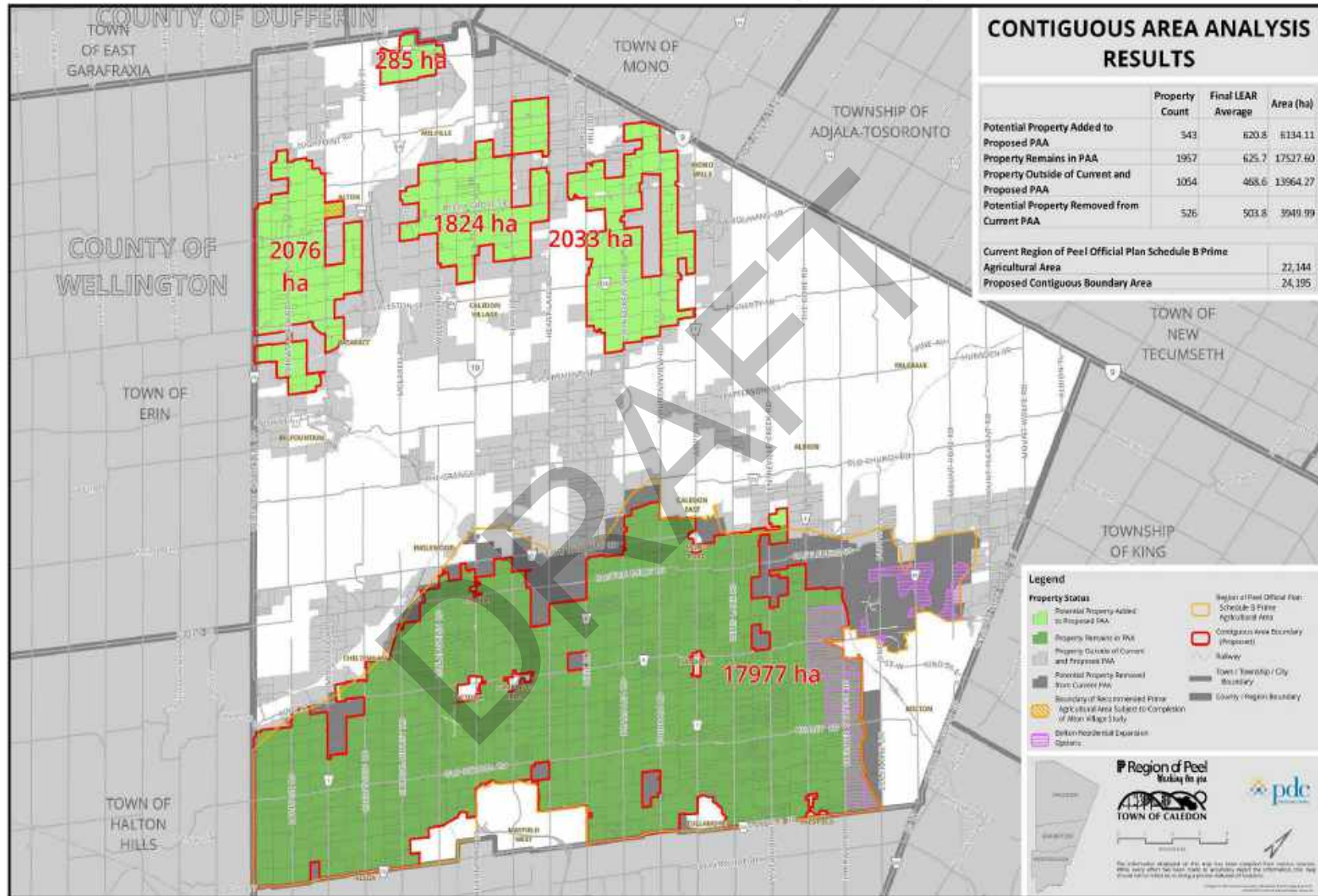
## ATTACHMENT "C"

FIGURE 8 - FSA ASSESSMENT UNITS



# ATTACHMENT "D"

FIGURE 9B - REGION - TOWN LEAR PRIME AGRICULTURAL AREA BOUNDARIES (MHBC, 2016)



Source: Region of Peel. (2019c). Agricultural Mapping Refinement Report, pg. 3



# ATTACHMENT "E"

To facilitate more specific analysis of the FSA, it has been divided into 8 areas as shown on **Figure 8**. Insight gained from the analysis conducted of each of these areas is summarized on **Table 2** for consideration as part of the ongoing comprehensive process to identify settlement area boundary expansion options.

TABLE 2 - ASSESSMENT AREA ANALYSIS (Units as shown on Figure 8)	
Assessment Area	Analysis
1	<p>This area is currently part of the PAA as designated in both the ROP and the Caledon Official Plan and is part of the GGH <b>Agricultural System</b>. The LEAR scoring for this area is lower than for the other assessment units (<b>Figure 12</b>). On average, it was below the Regional LEAR threshold for identifying PAA's. Although it has been recommended for removal from the PAA on Schedule X12 (<b>Figure 6</b>) as presented for review by the Region, it is retained as part of the proposed <b>Rural System</b>. It is part of a narrow band of land that links the Peel and York agricultural systems as identified by the Province. Retaining linkages is critical to sustaining a strong <b>agricultural system</b>. The majority of the area is bounded by Protected Countryside with a relatively small urban /rural interface (<b>Figure 32</b>). It is linked to the surrounding agricultural community, can support normal farm practises and reflects the rural character of the area. The property fabric is relatively intact, and the majority of the land is under production.</p>
2	<p>This area is separated from the areas to the west by an extensive finger of the Regional Natural Heritage System in the general vicinity of The Gore Road. The average LEAR score for this area (<b>Figure 12</b>) is well over the threshold for PAA. The property fabric is fragmented in areas to the west of the current urban boundary along the east side of Humber Station Road, along Mayfield Road and on the south side of King Street. There is an extensive interface with the urban designation south of King Street and along Mayfield Road where buffering or sufficient separation to allow normal farm practises to occur would be difficult (<b>Figure 32</b>). A review of historic MDS analyses for this area confirms that the livestock sector, which used to be strong in this area, is declining. The southern portion of the area will be divided by the GTA West Corridor and a proposed PSEZ (which is being questioned by the Region) covers most of the south east corner of the area. Except for the properties around King Street, the property fabric in the westerly portion along The Gore Road is largely intact with active farming ongoing. One of the few building permits issued over the past few years for barn improvements was for a livestock operation on The Gore Road north of King Street. Retaining the northern portion of this area as part of the <b>rural system</b> would strengthen the system.</p>