

February 2, 2022

**VIA EMAIL**

Planning and Growth Management Committee  
c/o Kathryn Lockyer, Regional Clerk  
Region of Peel  
10 Peel Centre Drive  
Brampton, ON  
L6T 4B9

Project: CE.CL

**RECEIVED**

February 2, 2022

REGION OF PEEL  
OFFICE OF THE REGIONAL CLERK

**Re: Peel 2051 Official Plan Review Summary and Next Steps**

SGL Planning & Design Inc. (SGL) represents the Wildfield Village Landowners Group who own and control a significant portion of land in the concession block bound by Healy Road to the north, The Gore Road to the east, Mayfield Road to the south and Centreville Creek Road to the west. As identified in the Staff Report and presentation for the Region's February 3, 2022 Planning and Growth Management Committee meeting, the Wildfield Village lands continue to be included as SABE Community Area (Figure 1).

Appendix II - Peel 2051: Official Plan Review and Municipal Comprehensive Review Comment Response Summary and Next Steps  
Draft Settlement Area Boundary Expansion - January 2022

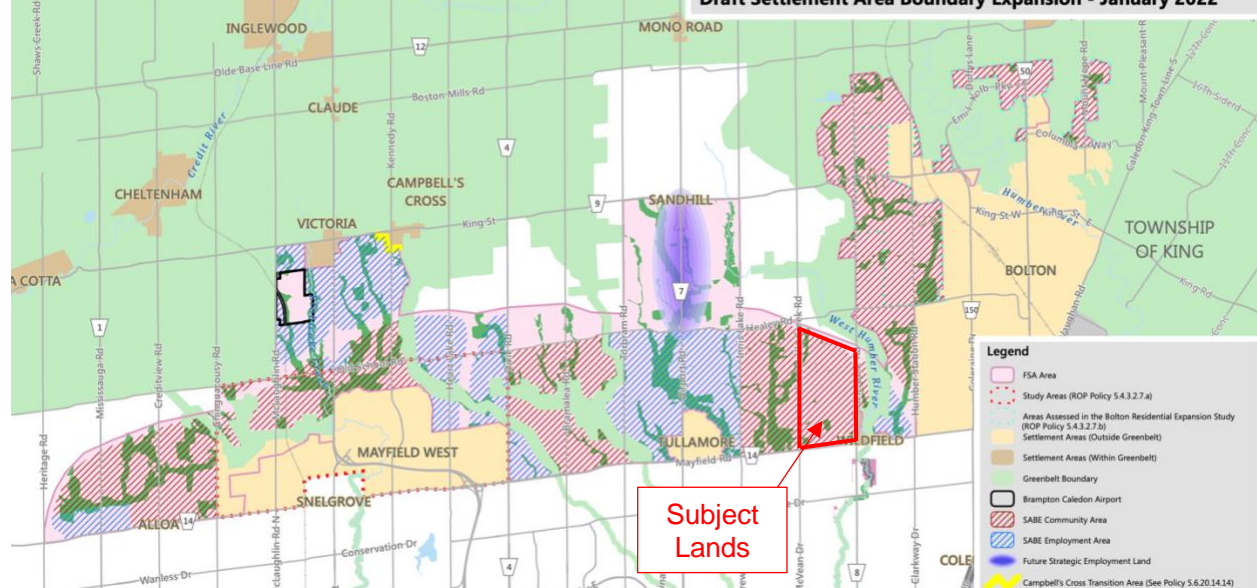


Figure 1. Draft SABE Concept Map (January 2022)

REFERRAL TO \_\_\_\_\_

RECOMMENDED

DIRECTION REQUIRED \_\_\_\_\_

RECEIPT RECOMMENDED ☒

We are supportive of the extensive work carried out by the Region to identify the lands proposed for settlement area expansion and the appropriate distribution and location of Community Area and Employment Area within those settlement expansion areas.

Wildfield Village will help accommodate the need for an additional 2,870 net developable hectares of Community Area lands identified within the Region's Land Needs Assessment. While the amount of future Community Area lands was recently reduced by the Region to accommodate increased Employment Area in Caledon based on factors such as alignment with Regional policies and good planning principles, the subject lands are still well positioned and identified to support Community Area growth. Wildfield Village will also assist the Region in accommodating a range and mix of housing as is required by the Land Needs Assessment and Provincial policy.

Wildfield Village also represents a logical first phase of settlement expansion as the lands immediately abut existing residential neighbourhoods to the south, and existing water and waste water infrastructure can easily be extended from the south optimizing planned growth and infrastructure.

We have also reviewed the summary of Staff's Responses to Site Specific Comments (February 2022) and note that our previous letter to the Region with specific comments on the draft Official Plan policies from November 30, 2021 was not referenced. To ensure these comments are considered, we have attached our previous November 30, 2021 letter.

Yours very truly,  
**SGL PLANNING & DESIGN INC.**



Paul Lowes, MES, MCIP, RPP

c.c. Adrian Smith, Region of Peel  
Ed Sajecki, Town of Caledon  
Glenn Pitura, Wildfield Landowners Group  
David Matthews, Matthews Planning & Management Ltd.  
Luis Correia, Solmar Developments

November 30, 2021

Project: CE.CL

**VIA EMAIL**

Virpal Kataure, Principal Planner  
Regional Planning and Growth Management  
10 Peel Centre Drive  
Suite A, 6<sup>th</sup> Floor  
Brampton, ON  
L6T 4B9

**Re: Wildfield Landowner Group Comments on Peel 2051 Draft Official Plan Policies**

SGL Planning & Design Inc. (SGL) represents the Wildfield Village Landowners Group who own and control a significant portion of land in the concession block bound by Healy Road to the north, The Gore Road to the east, Mayfield Road to the south and Centreville Creek Road to the west. The Peel 2051 draft Official Plan and mapping includes these lands as part of the New 2051 Community Area. We have previously noted our support for the inclusion of the lands as “Community Lands” through the Settlement Area Boundary Expansion Study in previous letters to the Region in March 2021 and September 2021.

Overall, we compliment staff on the thorough work that has been undertaken to prepare the revised Peel Region Official Plan. However, we would like to provide the following comments on specific policies on the draft Official Plan.

**Subwatershed Plans**

Policy 2.6.19.5 is proposed to direct subwatershed plans as follows:

*“Require the local municipalities, in consultation with the Region and conservation authorities to prepare **subwatershed plans**, or equivalent studies, prior to the development of a new or a major update to an existing secondary plan or local plan, or settlement area boundary expansion.”*

In our opinion, this policy’s reference to settlement area boundary expansion is unclear, as the SABE has already been conducted at the Regional level and is included within the new Official Plan so the word ‘prior’ does not make sense in that context.

**Wetlands**

We have concerns regarding the feasibility of Policy 2.14.19 for wetlands, which states:

*“Direct the local municipalities to include policies in their official plans that require pre-development wetland water balance to be maintained in areas proposed for development by limiting the area of impermeable surface or by using best management practices, where feasible.”*

It is uncertain whether water balance can be maintained in all small wetlands and some flexibility should be considered.

### **Greenlands System Protection, Restoration and Enhancement**

Proposed Policy 2.14.36 is also a concern:

*“Support the appropriate use of ecosystem compensation guidelines by the local municipalities and other agencies in accordance with the policies of this Plan subject to federal and provincial policy requirements and provided that development or site alteration will not result in negative impacts to the natural features or ecological functions of the Greenlands System. Where ecosystem compensation is determined to be an acceptable mitigation option, it should be applied to achieve a no net loss and if possible, a net gain, in natural heritage feature area or function.”*

This policy introduces ecosystem compensation which is a positive policy, but references that it must not result in negative impacts to the natural features. However, this is not feasible as ecosystem compensation, by nature, requires a negative impact to the feature as it is being replaced elsewhere through compensation. The requirement for a no net loss can be met through compensation. Please consider removing the statement on no negative impact.

### **Regional Urban Boundary**

Proposed Policy 5.5.6 sets out the following for growth management and phasing strategies for Designated Greenfield Areas:

*“Direct the local municipalities, in cooperation with the Region, to prepare growth management and phasing strategies for Designated Greenfield Areas and Strategic Growth Areas within the Regional Urban Boundary. These growth management and phasing strategies will address and incorporate issues such as the improvement of live-work relationships, unit mix and housing targets, a range of employment types, the timing and efficient provision and financing of necessary Regional and local municipal services, fiscal impacts to the Region and the local municipalities, staged build-out and logical extensions to development, priority areas for development, the policies and targets of this Plan, prolonging agricultural uses, and the sustainable rate of employment growth related to population growth.”*

This policy is fairly general, however requiring phasing strategies to address “prolonging agricultural uses” is problematic as land supply should not be limited simply to prolong agricultural uses within an urban area that may compromise meeting growth to 2051.

Alternative language is recommended, which could be similar to the wording used later within the Official Plan in Policy 5.6.20.14.11.i which sets out criteria required for staging and sequencing plans within the New Community Area as follows:

“i) provide for the orderly transition from agriculture and agricultural activities and related uses continue as long as practical”.

### **Designated Greenfield Areas**

Proposed Policy 5.6.20.12 sets out the following:

*“Direct local municipalities to include official plan policies that require community or neighbourhood block plans to implement the policies of any new Secondary Plans and the recommendations of the subwatershed study on a sub area basis in order to co-ordinate the overall delivery of services and infrastructure, staging and sequencing, financial and servicing agreements, provision of transit corridors and stations, infrastructure and allocation of development priority, layout of the transportation system, and the location, configuration character, size and urban form of parks, institutional, commercial and industrial sites and layout/function of open space corridors, valley lands, woodlands and other natural features, linkages and enhancement areas, including storm water management.*

In our opinion, the mechanism to identify community or neighbourhood block plans is not clear. It is unclear as to whether these plans are to be developed as part of secondary plans or subsequent to a secondary plan, as much of the required information above would be captured within the secondary plan study process. More clear direction is needed to differentiate what is completed at the block plan versus secondary plan level, as well as whether these community or neighbourhood block plans are to be statutory or non-statutory plans.

### **New 2051 Community Area**

Proposed Policy 5.6.20.14.10 sets out the following:

*“Permit approval of Secondary Plans by local municipalities only after the jurisdiction and financing mechanism of local transit service is determined to the Region’s satisfaction including the alignment of an East – West higher order transit corridor and the conceptual alignment of other higher order transit corridors along with sufficient east west road and goods movement capacity, recognizing the policies in this plan regarding the GTA West Corridor and support for alternatives to a highway.”*

This policy is an issue, as it requires that secondary plans not be approved until the jurisdiction and financial mechanism of local transit service is determined. It is not clear how jurisdiction and financing mechanisms will be determined or how long it will take to complete, which could lead to a delay in bringing needed greenfield lands to market to accommodate growth to 2051. It is also not clear how an alignment of an East-West



higher order transit corridor and conceptual alignment of other higher order transit corridors will be studied or determined. Until that is done, it would appear that all development in Caledon is on hold. The policy also speaks to determining sufficient east-west road and goods movement capacity. All of these matters could lead to significant delay in bringing on the 2051 Settlement Boundary Expansion lands in Caledon.

Proposed Policy 5.6.20.14.12 requires staging and sequencing plans to be developed in accordance with planning-related criteria. Specifically, Criteria B is of concern:

*“b) provide for the substantial completion of complete communities within community and neighbourhood areas before new community and neighbourhood areas are opened up for development”*

In our opinion, the intent of this criterion is unclear and problematic. It is unclear what “substantial completion” means. As well, this criterion could hold up development as one community or neighbourhood could be delayed due to one or more developers moving slowly with their own sales, marketing and development. The slow development of one community area is not necessarily reflective of the overall housing market and could inadvertently restrict housing supply. In our opinion, phasing should be conducted in accordance with infrastructure and community facility provision not the pace of one community area versus another.

Thank you for the opportunity to review and comment on the Region’s draft proposed policies and mapping.

Yours very truly,  
**SGL PLANNING & DESIGN INC.**



Paul Lowes, MES, MCIP, RPP

c.c. Adrian Smith, Region of Peel  
Kathryn Lockyer, Regional Clerk  
Glenn Pitura, Wildfield Landowners Group  
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