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December 3, 2020

P.N.17.2378.00
Peel/Caledon 2041

The Corporation of the Regional Municipality of Peel
10 Peel Centre Drive, Suite A
Brampton, Ontario
L6T 4B9

Attention: Mr. Adrian Smith, Chief Planner and
Interim Director, Regional Planning & Growth Management
- and -

The Corporation of the Town of Caledon
Community Services Department
6311 Old Church Road
Caledon, Ontario
L7C 1J6

Attention: Sylvia Kirkwood, Chief Planner

Subject: Region of Peel and Town of Caledon
2041+ Official Plan Review
Public Input – Mayfield East Landowners Group

REFERRAL TO _____
RECOMMENDED _____
DIRECTION REQUIRED _____
RECEIPT RECOMMENDED ☒

Dear Adrian and Sylvia:

Gagnon Walker Domes Ltd. represents the Mayfield East Landowners Group, who collectively own approximately 504.78 hectares (1,247.34 acres) of land in south Caledon. Their lands are generally bounded on the west by the eastern limit of the existing Mayfield West Rural Service Centre Boundary and the Campbells Cross Creek, on the east by Torbram Road and an unnamed tributary/natural heritage corridor, on the south by Mayfield Road, and on the north coinciding with the northern limit of the Province of Ontario GTA West Transportation Corridor (three (3) lots north of Old School Road).

The Mayfield East Landowners Group consists of a diverse group of landowners, who share a common goal which is to have all of their land included within the Mayfield West Settlement Boundary. *Attachment #1* is an air photograph of the subject lands, identifying each of the participating landowners.

Region of Peel and Town of Caledon Official Plan 2041+ Reviews

Our Client has and continues to have an interest in the *Region of Peel 2041+ Official Plan Review* and the *Town of Caledon 2041 Official Plan Review*. With respect to the Official Plan

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Review process, on March 5, 2019 and May 26, 2020, we made formal written submissions to the Town of Caledon and the Region of Peel (*Attachment #2*).

As outlined in our March 5, 2019 and May 26, 2020 submissions, the Mayfield East Landowners Group has directed that we formally request as part of the *Region of Peel 2041+ Official Plan Review* and *Town of Caledon Official Plan Review* process that all of their lands located both within and east of the current Mayfield West Settlement Boundary (within the Region of Peel's Focus Study Area) be included within an expanded *Mayfield West Rural Service Centre*. Our Client's lands are well positioned to assist in accommodating a portion of the projected 2031 – 2051 population and employment growth; on lands located within and immediately adjacent to an existing *Rural Service Centre* (Mayfield West). Whereas our earlier submissions referenced a planning horizon of 2031 – 2041, the Region of Peel and the Town of Caledon are now undertaking the Official Plan Review to the planning horizon of 2051 as per the recently approved Amendment 1 to the Growth Plan, 2019.

Rationale in Support of an Expanded Mayfield West Rural Service Centre Settlement Area Boundary

The inclusion of the Mayfield East Landowners Group lands within an expanded *Mayfield West Rural Service Centre* represents a logical extension of the Settlement Area as part of the *Peel 2041+ Official Plan Review* and *Town of Caledon 2041 Official Plan Review*. In our March 5, 2019 and May 26, 2020 correspondence, we outlined the rationale for including all of our Client's lands within an expanded *Mayfield West Rural Service Centre*. We are confident that the detailed technical Reports, Plans and Studies which are being prepared and/or managed by Regional and Town Staff will substantiate and highlight the merits of our Client's lands as an ideal candidate location for inclusion within the expanded *Mayfield West Rural Service Centre Boundary*.

Region of Peel Open Houses September 2020

We attended the 'virtual' *Peel 2041+ Official Plan Review* Open Houses at the end of September 2020, and in particular the Open Houses held on September 28, 29, 30 and October 1, 2020 in connection with the Settlement Area Boundary Expansion (SABE). The presentations included several plans from the various technical studies being completed as part of the SABE. The following is a summary of various plans from the studies that support the rationale of including all of our Client's lands within an expanded *Mayfield West Rural Service Centre*:

- **Commercial & Employment Opportunities: Employment Land** (*Attachment #3*)
 - Our Client's lands are located within the Employment Allocation FSA Sub-Study Area #4. According to the Technical Study's preliminary conclusions, Area 4 – Mayfield West has strong potential for near and long-term employment uses.
- **Commercial & Employment Opportunities: Retail Commercial** (*Attachment #4*)
 - Our Client's lands are located within the Employment Allocation FSA Sub-Study Area #4. The Technical Study notes the following preliminary conclusions as it relates to Area 4 – Mayfield West: 1) planned population in



Mayfield West will generate demand for new retail-commercial uses; and 2) GTA West Corridor that intersects with Highway 410 has excellent visibility and accessibility and is a good location for major retail-commercial development.

- Community Health Assessment (Attachment #5)
 - A review of the plan from the Community Health Assessment Study indicates that our Client's lands meet most if not all criteria used in the assessment. These criteria include: density; land use; service proximity; contiguous expansion; mobility and connectivity; natural environment and sustainability; and food systems.
- Water & Wastewater (Attachment #6)
 - Our Client's lands are within Sub-Area 3 – Mayfield West – East Extension, as well as Sub-Area 5 – Wildfield. It is noted from a review the plan that part of Sub-Area 5 overlaps with Sub-Area 3. While the preliminary conclusions of the Study note that Sub-Area 3 is less preferred based on servicing requirements, Sub-Area 5 which includes the majority of our Client's lands is noted as being better positioned for future servicing.
- Transportation (Attachment #7)
 - Our Client's lands span both Sub-Areas 6 and 7. The preliminary conclusions of the Technical Study indicate that both Sub-Areas support sustainable modes, network connectivity and vehicle traffic, with Sub-Area 6 also supporting goods movement.
- Agricultural Impact Assessment (Attachment #8)
 - Our Clients lands are located within both Sub-Areas 5 and 8. According to the preliminary conclusions of the Study, the existing land use is largely agricultural for Sub-Area 8 with the area having an extensive interface with Mayfield West. With regard to Sub-Area 5, while the preliminary conclusions indicate that the area contains a significant cluster of active farm operations; including large livestock operations, it is noteworthy that of our Client's lands located in this Sub-Area, three (3) parcels are within the existing Mayfield West Study Area boundary which has extensive interface with Mayfield West, and five (5) parcels are immediately adjacent thereto.
- Environmental Screening & Scoped Subwatershed Study (Attachment #9)
 - All of the lands being studied as part of the SABE exhibit some form of low, medium and high constraints, and the Study notes that no area is preferred over the other.



- Cultural Heritage Assessment
 - Similar to the Environmental Screening & Scoped Subwatershed Study, the preliminary conclusions of the Cultural Heritage Assessment indicate no preferred locations for the SABE, as there were 111 properties identified as potential cultural heritage resources, 4 properties designated under the Ontario Heritage Act, 23 properties listed on the Heritage Register, all spread evenly across the SABE Focused Study Area.

Settlement Area Expansion – Region of Peel Official Plan

Section 7.10.2.12 of the Region of Peel Official Plan (ROP) includes *criteria* which are to be considered when proposing a Settlement Area expansion. Our Client's position is that the inclusion of the MELG lands conforms to the intent and spirit of the ROP criteria. Listed below are the *criteria* cross-referenced with Section 7.10.2.12 along with the rationale in support thereof:

- a) *"that the proposed expansion is based on the population, household and employment growth forecasts contained in Table 3";*
 - The population, household and employment growth forecasts contained in Table 3 of the ROP for the Town of Caledon is based on a 2031 planning horizon. According to the 2020 Provincial Growth Plan, the Region of Peel is forecast to continue growing rapidly to the year 2051. The Province has extended the planning horizon of Schedule 3 of the Growth Plan to 2051, inclusive of a projected Region of Peel population of 2,280,000 and employment of 1,070,000. The proposed expansion to the *Mayfield West Rural Service Centre* represents an opportunity to accommodate a modest amount of projected population and employment growth.
- b) *"that sufficient opportunities, as determined by the Region, are not available in the area municipality to accommodate forecasted growth for the area municipality contained in Table 3, through intensification and in designated greenfield areas.";*
 - The ongoing Settlement Area Boundary Expansion (SABE) Study focuses on the 'Whitebelt' areas of the Town of Caledon, which includes the MELG lands. As noted above, a review of the preliminary conclusions of the Technical Studies comprising the SABE indicates that all of the Studies support the inclusion of the MELG lands in an expanded Mayfield West Rural Service Centre.
- c) *"the timing of the expansion and the phasing of development within the designated greenfield area will not adversely affect the achievement of the intensification and density targets of this Plan.";*
 - Our Client's lands are located in the Greenfield Area identified by the Region of Peel for study for potential inclusion within an expanded Settlement Area. When the Region began the process, the initial land needs assessment determined 1,300 ha (3,212.37 acres) to 2041 was required for the SABE.



With the extension of the planning horizon to 2051 and the additional population and employment forecasts, during the above-mentioned Region of Peel Open Houses, it was noted that the land required for the SABE is projected to be 2 to 4 times higher than the original estimate.

d) *"that the proposed expansion makes available sufficient lands for a time horizon not exceeding 2031";*

- Our Client's lands are within the Rural System, with a portion of the lands within the Mayfield West Study Area limits which consists of lands outside of the 2031 boundary. It is envisaged that the proposed expansion would make the MELG lands available for development. It is noteworthy that the current *Region of Peel and Town of Caledon Official Plan Reviews* are, among others, revising the planning horizon to 2051, consistent with the 2020 Growth Plan.

e) *"conformity with the Regional Official Plan";*

- A Municipal Comprehensive Review (MCR) is currently being undertaken, including the preparation of the SABE Study, prior to consideration of the proposed expansion. The requested expansion is being advanced as part of the *Region of Peel and Town of Caledon 2041+ Official Plan Reviews*. The proposed expansion is a logical extension to the existing Mayfield West Rural Service Centre, with lands either immediately adjacent to the Mayfield West Rural Service Centre boundary, or within the Mayfield West Study Area and immediately adjacent thereto. The GTA West Corridor and the various Natural Heritage System features that traverse the lands act as a natural boundary, while at the same time providing an opportunity to promote and support population and employment growth, goods movement, vehicle traffic and network connectivity, recreational opportunities, and ease of servicing infrastructure expansion.

f) *"environmental and resource protection and enhancement including the identification of a natural heritage system, in accordance with the policies of this Plan";*

- Our Client's lands are located in the area identified by the Region of Peel for study for potential inclusion within an expanded Settlement Area. As noted in the above-mentioned review of the Region of Peel Open Houses, it was noted that all of the lands being studied as part of the SABE (including our Client's lands) exhibit some form of low, medium and high constraints, and the SABE Study notes that no area is preferred over another. To the greatest extent possible, and in accordance with current best practices, future development applications would be required to demonstrate how the natural environment would be protected.

g) *"that there are no reasonable alternative locations which avoid the Prime Agricultural Areas";*

- The MELG lands, along with the rest of the SABE lands being considered for expansion are all designated Prime Agricultural Area, and were selected for



study by the Region of Peel. The objective being to identify appropriate locations for additional community (residential) and employment lands in Caledon. The ongoing SABE Study focuses on the 'Whitebelt' areas of the Town of Caledon; the remaining land mass located outside of the Greenbelt Area. The MELG lands have numerous attributes; including being located contiguous to the Mayfield West Rural Service Centre (including a portion within the Mayfield West Study Area), their close proximity to existing urban development, and the ability for them to be developed with appropriate buffers to the natural heritage system.

- h) *"impacts of a proposed settlement area boundary expansion on agricultural operations which are adjacent or close to the settlement area, and if impacts are identified, the analysis is to identify mitigation of the impacts to the greatest extent feasible";*
- The adjacent lands to the south and west are part of the existing Mayfield West Rural Service Centre, and as such, the proposed boundary expansion would have no impact on agriculture in this area. As noted above, our Clients lands are located within the area identified by the Region of Peel for inclusion in the SABE Study. The Agricultural Impact Study being conducted as part of the SABE (as described earlier) notes that our Clients lands are largely agricultural and have an extensive interface with Mayfield West.
- i) *"within the Prime Agricultural Area there are no reasonable alternative locations on lower priority agricultural lands";*
- As noted above, the SABE lands being considered for expansion are designated Prime Agricultural Area. The SABE lands (including our Client's lands) is the area identified by the Region of Peel to study for determining the appropriate location(s) for additional community (residential) and employment lands in Caledon. The ongoing SABE Study focuses on the 'Whitebelt' areas of the Town of Caledon. The MELG lands are located contiguous to the Mayfield West Rural Service Centre (including a portion within the Mayfield West Study Area). They are located near existing urban development, and can be developed with appropriate buffers to the natural heritage system.
- j) *"impacts from expanding settlement areas on agricultural operations are mitigated to the greatest extent feasible";*
- As noted above, while the lands are within the Prime Agricultural Area, the SABE Study Area is the area identified by the Region of Peel for the accommodation of the proposed population and employment projections to the 2051 planning horizon. The MELG lands are immediately contiguous to the Mayfield West Rural Service Centre; including a portion of the lands being located within the Mayfield West Study Area.
- k) *"compliance with the minimum distance separation formulae";*
- Our Client's lands are located in the area identified by the Region of Peel for study for potential inclusion within an expanded Settlement Area. To the



greatest extent possible, and in accordance with current best practices, future development applications would be required to demonstrate how the minimum distance separation formulae would be adhered to.

l) *"a fiscal impact analysis";*

- The proposed expansion represents a logical and efficient expansion of the Mayfield West Rural Service Centre, utilizing existing and/or planned infrastructure; including the future GTA West Transportation Corridor and Highway 410 extension, which are located immediately adjacent thereto and/or traversed by them. It is anticipated that the expansion would not negatively impact the finances of the Town of Caledon, nor the Region of Peel.

m) *"the ability to provide the necessary Regional infrastructure and services, including Regional and local transportation infrastructure, water and wastewater servicing, in a financially and environmentally sustainable manner";*

- The proposed expansion area represents readily serviceable lands which can also take advantage of existing and/or planned community facilities and infrastructure; including the cost-efficient extension of existing and/or planned Region of Peel water, wastewater and transportation infrastructure.

n) *"the sustainable development imperatives of Policy 1.3.5 have been addressed";*

- The future development within the proposed expansion area(s) will consider the sustainable development framework of the ROP; including the integration of the environmental, social, economic, and cultural imperative as appropriate.

o) *"other relevant Regional interests as may be confirmed through pre-consultation";*

- On the assumption that the proposed boundary expansion is supported and the subject lands are included within the limits of the Mayfield West Rural Service Centre, in the future other relevant Regional interest(s) will be addressed at the time of, and subsequent to the Pre-Consultation Application and processing of Formal Development Application(s).

p) *"proposed expansion will meet the requirements of the Greenbelt Plan, Niagara Escarpment Plan, Lake Simcoe Protection Plan and the Oak Ridges Moraine Conservation Plan";*

- The subject lands are not located within the limits of the Niagara Escarpment Plan, Lake Simcoe Protection Plan and the Oak Ridges Moraine Conservation Plan, and as such none of these Plans are applicable. A portion of the lands are within the Greenbelt Plan Area (natural heritage system corridors).

The Greenbelt Plan does not prohibit the establishment of settlement areas, nor their expansion. In this respect, if the Region of Peel and the Town of



Caledon support the expansion of the Mayfield West Rural Service Centre as proposed, it is subject to the application of applicable legislation, policies and guidelines.

- q) *"in determining the most appropriate location for expansions to the boundaries of settlement areas the policies of Sections 2 and 3 of the Provincial Policy Statement, 2005 are applied".*
- The proposed expansion will contribute to the protection, improvement and restoration of the natural environment, as well as the quality and quantity of water. In addition, the proposed expansion will adhere to the policy framework governing the protection of public health and safety (natural and man-made hazards).

Settlement Area Expansion – Town of Caledon Official Plan

Similar to the ROP, *Sections 4.2.3.3.1 and 5.10.3.25* of the Caledon Official Plan (COP) include *criteria* which are to be considered when proposing a Settlement Area Expansion. Our Client's position is that the inclusion of the MELG lands conforms to the intent and spirit of the COP.

Where the wording and interpretation of the policies within the COP are similar to the ROP, the opinion/rationale is equivalent to the evaluation mentioned above, save and except for those listed below.

The following are in connection with *Section 4.2.3.3.1* of the COP:

- a) *"How the proposed expansion is based on the population and employment forecasts and population allocations in Tables 4.1 to 4.6 of this Plan";*
- The population and employment growth forecasts contained in Table 4.1 of the COP are identical to Table 3 of the ROP for the Town of Caledon and are based on a 2031 planning horizon. According to the 2020 Provincial Growth Plan, the Province has extended Schedule 3 of the Growth Plan to 2051, inclusive of projected Region of Peel population of 2,280,000 and employment of 1,070,000.

Table 4.3 of the COP for the Rural Service Centres is based on a 2031 planning horizon. As part of the MCR process, this request is being made in the context of the ongoing *Region of Peel and Town of Caledon 2041+ Official Plan Reviews*; including the SABE Study. The proposed expansion to the Mayfield West Rural Service Centre represents an opportunity for a logical extension to the current built-up area to accommodate a modest amount of projected population growth, and lands that are suitable for the designation of a variety of both residential and employment land uses, which together will contribute to the creation of a complete community.



- c) *"The potential impact of the expansion on the function and character of the community including those lands in neighbouring municipalities";*
- The expansion will have no impact on the function and character of the Mayfield West Rural Service Centre as an urban area accommodating both residential and employment land uses, as well as a full range of community facilities, parks, open space and natural heritage features, contributing to the creation of a complete community.
- d) *"The expansion is a logical and contiguous addition to the existing settlement";*
- Our Client's recommendation represents a logical expansion of the Mayfield West Rural Service Centre Boundary in an easterly direction; including the previously identified 'Mayfield West Study Area' which is located immediately adjacent to the established settlement boundary of the Mayfield West Rural Service Centre. This area represents a logical progression of growth outward from and/or toward other established residential and employment districts.
- i) *"The preparation and conclusions of watershed and sub-watershed studies that also address impacts in neighbouring municipalities within the watershed or sub-watershed area";*
- The expansion of the limits of the Mayfield West Rural Service Centre would not have any discernable impact on the neighbouring municipalities. As noted earlier, the preliminary conclusions of the Environmental Screening and Scoped Subwatershed Study as part of the SABE Study, all of the lands being studied as part of the SABE exhibit some form of low, medium and high constraints, and the Study notes that no area is preferred over another.
- l) *"Conformity with the objective and policies of the Region of Peel Official Plan; and, the principles, strategic direction, goals, objectives and policies of this Plan";*
- This request is being made as part of the ongoing *Region of Peel and Town of Caledon MCR/2041+ Official Plan Reviews*. The proposed expansion conforms to the intent and spirit of the ROP and the COP as it relates to applicable principles, strategic goals and objectives, as well as policies which speak to projected growth and the desire to accommodate same within and/or adjacent to established settlement areas (through municipally recommended expansions).
- p) *"The sustainability objectives and policies of Section 3.1 of this Plan";*
- Future development within the proposed expansion area will consider, promote and integrate the objectives and pillars of sustainability of the COP; including economic, environmental, and social/cultural.

The COP also includes relevant policies which have been considered in requesting the modest expansion of the limits of the Mayfield West Rural Service Centres; including specifically the following from *Section 5.10.3.25*:



a) *"Protection of environmental and cultural resources";*

- According to Schedule A and Schedule B to the COP, the vast majority of the subject lands recommended for inclusion in the Mayfield West Rural Service Centre are designated 'Rural Lands' and 'Prime Agricultural Area' as opposed to 'Environmental Policy Area' / 'Greenbelt Plan Area', and as such the natural heritage system would not be significantly impacted (if at all) by the inclusion of the lands as proposed. Cultural resources will be appropriately protected through future development applications.

e) *"The need and demand for development";*

- Based on the Town of Caledon Housing Study, 2017 (Study), the Town of Caledon's population is expected to increase by 62.4% by the year 2031. The aforementioned Study included a number of conclusions and recommendations; one of which highlighted the need to broaden the range of housing options for households with low and moderate incomes, seniors, persons living alone and with disabilities.

The population and employment growth forecasts contained in Table 4.1 of the COP are identical to Table 3 of the ROP for the Town of Caledon and are based on a 2031 planning horizon. According to the 2020 Provincial Growth Plan, the Province has extended Schedule 3 of the Growth Plan to 2051, inclusive of projected Region of Peel population of 2,280,000, as well as employment of 1,070,000.

In this regard, Caledon needs to accommodate a significant amount of growth over the next 30 years to 2051. The SABE Study is being undertaken to comprehensively plan for this growth. The need and demand to accommodate projected population growth, housing diversity and employment growth supports the request to expand the Mayfield West Rural Service Centre to include the MELG lands.

Merits

In addition to the review of the *Region of Peel 2041+ Official Plan Review* Open Houses and the Official Plan Settlement Area Boundary Expansion Criteria, listed below is a brief summary of the overall 'merits' associated with our Client's proposed Settlement Boundary Expansion Area.

1. Existing and Proposed Transportation Infrastructure

- The area has extensive frontage along Mayfield Road (an identified Region of Peel 'Strategic Goods Movement Corridor'), with excellent locational proximity to existing Highway 410 and the future proposed GTA West Transportation Corridor which traverses through lands owned by our Clients.



2. Close Proximity to Employment Lands

- The lands recommended for inclusion are strategically located close to existing and/or proposed employment areas; including, the Tullamore Settlement Area which provides logical geographic, transportation and land use planning connections between Tullamore and the Mayfield West community; contributing to live/work synergistic opportunities. The proposed employment area will capitalize on and be supported by the GTA West Transportation Corridor, the Highway 410 extension, and the Mayfield Road Goods Movement Corridor.

3. Logical Progression of Growth

- Our Client's lands represent a logical expansion of the Mayfield West Rural Service Centre Boundary in an easterly direction; including, the previously identified 'Mayfield West Study Area' which is located immediately adjacent to the established settlement boundary of Mayfield West. This area represents a logical progression of growth outward from and/or toward other established residential and employment districts.

4. Readily Serviced Lands and Community Service Facilities

- The proposed expansion area represents readily serviceable lands which can also take advantage of existing and/or planned community facilities and infrastructure; including, the cost-efficient extension of existing and/or planned Region of Peel water, wastewater and transportation infrastructure. In addition, the lands located on the east side of the proposed expansion area are adjacent to, or in close proximity to the existing Mayfield Secondary School, Mayfield Recreation Centre, James Grieve Public School, and a large retail plaza located on the east side of Bramalea Road, immediately south side of Mayfield Road.

5. Creation of a Complete Community

- The lands recommended for inclusion represent a logical extension to the current built-up area. They are suitable for the designation of a variety of both residential and employment land uses, which together will contribute to the creation of a complete community, compatible with adjacent existing land uses in the Town of Caledon and the City of Brampton.

Attachments #10 and #11 include a set of plans prepared by MELG that show very conceptually where our Client's believe the 'Residential' and 'Employment' lands should be planned for conceptually (subject to future study and refinement at the Secondary Plan preparation and implementation stage). The proposed expansion area could consist of approximately 903.26 ha (2,232.00 ac) of land potentially suitable for residential, as well as approximately 259.02 ha (640.05 ac) of land suitable for employment, supported by some 463.49 ha (1,145.31 ac) of Natural Heritage System features (see *Attachments #10 and #11*).

Our Client represents a robust and fully engaged Landowners Group which is capable of providing effective and informed input into the *Region of Peel 2041+ Official Plan Review* and *Town of Caledon 2041 Official Plan Review* process. Collectively, all of the landowners we represent are in agreement that their lands can and should be considered for inclusion in the Mayfield West Settlement Boundary/Rural Service Centre. The lands recommended for inclusion represent an ideal opportunity to accommodate both population and employment growth. Toward this end, we respectfully request that the *Region of Peel* and *Town of*



Caledon give serious consideration to expanding the *Mayfield West Rural Service Centre* as proposed by our Client.

We respectfully request to be notified of any and all future Open House and Statutory Public Meetings, as well as the tabling of Information and/or Recommendation Reports to Planning Committee/Council related to the *Region of Peel 2041 Official Plan Review* and *Town of Caledon 2041 Official Plan Review*; including all Notices of Decision in connection with the *Region of Peel 2041 Official Plan Review* and *Town of Caledon 2041 Official Plan Review*.

Yours truly,

Michael Gagnon, B.E.S., M.C.I.P., R.P.P.
Managing Principal Planner

Andrew Walker, B.E.S., M.C.I.P., R.P.P.
Principal Planner

cc: **Regional Chair and Members of Regional Council**
Mayor and Members of Caledon Council
Mayfield East Landowners Group
Tara Buonpensiero, Region of Peel
Marissa Williams, Town of Caledon
Michelle Harris, Gagnon Walker Domes Ltd.