VIA E-MAIL

September 27, 2016

Regional Council
The Regional Municipality of Peel
10 Peel Centre Dr. Suite A
Brampton, ON
L6T 4B9

Attention: Kathryn Lockyer, Regional Clerk

Dear Mr. Chair and Members of Council,

RE: Bolton Residential Expansion Regional Official Plan Amendment
September 29, 2016 Statutory Public Meeting

We are the lawyers for the Bolton North Hill Landowners Group. The members of the BNHL collectively own nearly 100 hectares of developable land in the whitebelt north of historic Bolton in what have been referred to throughout this process as the “Option 1” lands and a portion of the “Option 2” lands.

With the impending Bolton Residential Expansion, Council is faced with a crucial decision that will shape the future of this community for decades to come. In light of this, for the consideration of Council, we are pleased to submit “Bolton Residential Expansion Submissions 2016”, a report prepared by Bousfields Inc. on behalf of the BNHL (the “BNHL Submission”) which is enclosed herewith.

The BNHL Submission presents a vision for the expansion of the Bolton Rural Service Centre (as it is commonly referred) through the completion of historic Bolton northward. The BNHL Submission refers to this as “Hybrid Option 1/2”, encompassing the entirety of the Option 1 lands in addition to the southernmost portion of Option 2 fronting onto Columbia Way. An aerial showing the extent of the lands is found at page 2, Figure 4 of the BNHL Submission.

For ease of reference, key highlights of the BNHL Submission, which demonstrate why Hybrid Option 1/2 is the clear choice for the Bolton Residential Expansion, are reproduced below:

- **Hybrid Option 1/2 is the only option to achieve 2031 population target** – The appropriate long-term planning for lands located in West Bolton is dependent upon a larger vision for West Bolton, which will be shaped by the ultimate alignment of the GTA West Corridor. By contrast, Hybrid Option 1/2 will complete the build-out of the existing Bolton residential area and is not constrained by any Provincially significant corridor. A more fulsome analysis is provided in Section 5 of the BNHL Submission.
• **Cost effective** - BNHL is an experienced and coordinated landowners group which understands the importance of cost recovery related to expansion, and is willing to participate in the necessary cost sharing arrangements, whether it be through front ending, area-specific development charge, or other appropriate mechanisms. While other expansion options have been identified as being more cost efficient, this conclusion is not based on a thorough analysis of the cost recovery options available and also only recognizes the costs associated with hard services (primarily water and wastewater) and ignores the full range of costs, including transportation and population-related soft costs. In addition, there has been no consideration for the cost implications relating to land acquisition related to the GTA West Corridor by designation of the Option 6 lands as Urban.

• **Closest to existing community facilities and parks** – Hybrid Option 1/2 is well integrated into the existing residential area and is therefore located in proximity to existing soft services, including two secondary schools, an elementary school, the Caledon Centre for Recreation and Wellness, a new fire/paramedic station, and the nearby North Hill conservation area and associated trail network running through Bolton and connecting to Palgrave to the north.

• **Resolves existing servicing issues in Bolton** – The infrastructure upgrades associated with an expansion of the Hybrid Option 1/2 will resolve existing servicing constraints in Bolton and provide for long-term benefit. Specifically, the establishment of Pressure Zone 7 will address existing water pressure issues for over 1,000 homes in north Bolton.

• **Most Transit supportive and Only Option with Existing Transit Service** – Hybrid Option 1/2 is currently served by GO bus service and is the only option being considered with any access to existing transit service.

• **Access to recently constructed Emil Kolb Parkway** – the Emil Kolb Parkway was recently completed, providing good access to new development in Hybrid Option 1/2. Emil Kolb Parkway will become another major north/south route through Bolton.

• **Achieves identified criteria for expansion** – The criteria for assessing the expansion areas created by Planning Partnership for Peel Region generally favour Hybrid Option 1/2. The exception being the criteria based on misconceptions related to cost and cost-recovery as well as impacts on long-term urban structure. Completing the build-out of North Bolton would have less potential impact on the potential urban structure than any other option. West Bolton should be planned as one comprehensive area after the GTA West Corridor EA has been completed and the preferred alignment identified.

• **Completion of Historical Bolton/Logical boundary infilling of whitebelt lands** – The 1997 Ontario Municipal Board decision did not include residential expansion onto the Hybrid Option 1/2 lands in order to allow the Town to initiate the tri-nodal concept which included Mayfield West. In that decision, the OMB noted that once the other nodes have been established it would be likely that the Region and Town would be the first to come back to North Bolton to complete its build-out. It is more logical to finish the residential community in North Bolton, within the confines of the hard boundary of the Greenbelt, before providing for new isolated pockets of residential development in West Bolton.

• **Will not be delayed by pending Provincial projects** – Hybrid Option 1/2 will involve a logical extension of Bolton, whereas other options, specifically Option 6, would include lands which are currently identified as being located within the GTA West corridor. GTA West corridor lands
are identified as “Corridor Protection Area” in the Brampton Secondary Plan Area 47 and Strategic Infrastructure Study Area (SISA) in the Peel OP, which recognize the importance of the corridor and does not permit development within the corridor. The same recognition should be applied to the Option 6 lands, resulting in a delay and preventing the Town of Caledon from meeting their population targets to 2031.

- **Metrolinx Confirmed No Go Rail Station proposed in Bolton** – Many of the arguments for expansion options in West Bolton relate to the potential for a GO Station somewhere in the vicinity of King Street. Now that Metrolinx has released its report in June 2016 indicating that this station will not occur within the 2031 timeframe, the justification is no longer applicable or appropriate. This decision will significantly impact the nature and density of development which would occur in the short term. Delaying development in the west until there is greater certainty with respect to the provision of higher order transit would permit a more appropriate and integrated implementation of transit oriented development. The absence of a GO station for the short to medium term impact the Peel criterion 17 which scored options higher based on proximity to higher order transit. On a re-evaluation of this criterion, none of the options would score well, but with Option 1 being the most transit supportive overall, per criterion 6.

- **Other options introduce potential impacts on future residents and/or Employment Areas whereas Option 1 is compatible with adjacent land uses and will support local economy** – Many of the options introduce new residential, primarily low density, residential development directly adjacent to large existing and planned employment areas, which may result in issues related to sensitive land uses, which could raise conformity issues with the Growth Plan and compliance issues with the Provincial Policy Statement. The introduction of sensitive land uses could result in difficulties for industrial operations to maintain or obtain required certificates of approval from the MOE (due to potential noise, odour or other contaminant impacts and related complaints that can put real pressure on business operations and expansions). By contrast, the Hybrid Option 1/2 lands are located nearby to the existing commercial business district and in proximity to jobs and result in a compatible arrangement of land uses.

The BNHL urges Council to consider the findings of the BNHL Submission and to make a decision that is based on sound planning grounds which enables Bolton to grow in a way that enhances the vitality and livability of the Town. As the BNHL Submission makes clear, the only option which accomplishes this is Hybrid Option 1/2.

We look forward to continuing to work with the Region on this very important initiative and would welcome an opportunity to meet with all appropriate staff and consultants to discuss the content of the BNHL Submission in more detail.

On behalf of the BNHL, we thank Council for its time and consideration.

Yours very truly,

LOOPSTRA NIXON LLP

Per: Quinto M. Annibale

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