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Date: February 27, 2026

Our Ref: 30256718

**Subject: Bolton North Hill Landowners Group: PDSB Second School Site Analysis**

Dear Mr. Bissett,

As noted in Peel District School Board's ("**PDSB**" or "**the Board**") correspondence entitled "*Notice of Application and Request for Comments, Application to amend the Official Plan (1<sup>st</sup> Resubmission) POPA 2022-0001*" dated June 18, 2025, PDSB has required and requested two (2) elementary school sites to accommodate the planned population within the proposed Bolton North Hill Secondary Plan. As displayed in Bolton North Hill Landowners Group's ("**BNHLG**") most recent concept plan dated February 11, 2026, the proposed secondary plan identifies lands for one (1) PDSB elementary school site and one (1) Dufferin-Peel Catholic District School Board ("**DPCDSB**") elementary school site, which does not align with comments received from PDSB for the provision of two public elementary sites. In support of BNHLG's proposed concept, Arcadis has prepared this "PDSB Second School Site Analysis" to provide the rationale for one public elementary school site within the Bolton North Hill Secondary Plan.

It should be noted that the provision of one DPCDSB elementary site meets DPCDSB's school requirements and is therefore not included in this analysis.

## Summary of Findings

- **PDSB is projecting a surplus of pupil spaces within Caledon in 2034 for surrounding school locations:** as per PDSB 2024- 2025 Annual Planning Document, the available pupil capacity of BNHLG's in-district elementary school (Palgrave PS) and three (3) surrounding elementary schools which are closer to the BNHLG site than Palgrave PS, is 688 students in 2034. This available capacity almost doubles to 1,173 students in 2038.
- **Existing capacity within the system should be utilized prior to requirement for new school sites:** From O.Reg. 20/98, an Education Development Charge ("**EDC**") can only be enacted by a school board when the estimated number of school pupils exceeds the total capacity of the board to accommodate the projected growth. As PDSB is charging an EDC on new development, the future capacity within surrounding schools should be factored into the need for future schools as part of development requirements.
- **The pupil yield rate applied to the Bolton North Hill Secondary Plan is not consistent with the rates identified in the Board's EDC background study or with other recent developments in Caledon:** an assessment of pupil yield rates from PDSB's EDC Background Study and surrounding

developments in Caledon indicates that the pupil yield rates applied to developments greatly varies. Utilizing the EDC yield rate as a baseline, surrounding development yield rates were calculated to be as low as 68% below the EDC, to as high as 42% above the EDC rates (BNHLLG proposed development). It is unclear as to why the yield rate from the EDC has not been utilized or why different rates are applied to different developments. A standardized approach, based on the Board's background work (i.e. the EDC yield rate), should be applied to all new development. This approach would match DPCCDSB's methodology to determine pupil yield for new development.

- **Utilizing the EDC yield rate, the BNHLLG proposed development is estimated to yield 1,437 students at build-out. Based on existing capacity and the provision of one new public elementary school on site, there is expected to be a surplus of 101 student spaces in 2034:** Accounting for future capacity within existing schools and the inclusion of one new public elementary school on site, Arcadis estimates that there will be surplus of 101 pupil spaces. This would indicate that a second public elementary school site is not required.
- **Of note, there is a vacant PDSB school site 3.1 km southwest of the BNHLLG site which has been vacant since acquisition in 1999:** The development of lands already owned by the school board could provide additional capacity for both the BNHLLG development and other developments in Caledon. Arcadis estimates the capacity of a school on site could accommodate 450 students, which would further the surplus of pupil space surrounding the BNHLLG site.

Based on the above, it is Arcadis' opinion that only one public elementary school site should be required within the Bolton North Hills Secondary Plan to accommodate future growth.

## Analysis

### PDSB is projecting a surplus of pupil spaces within Caledon in 2034 for surrounding school locations

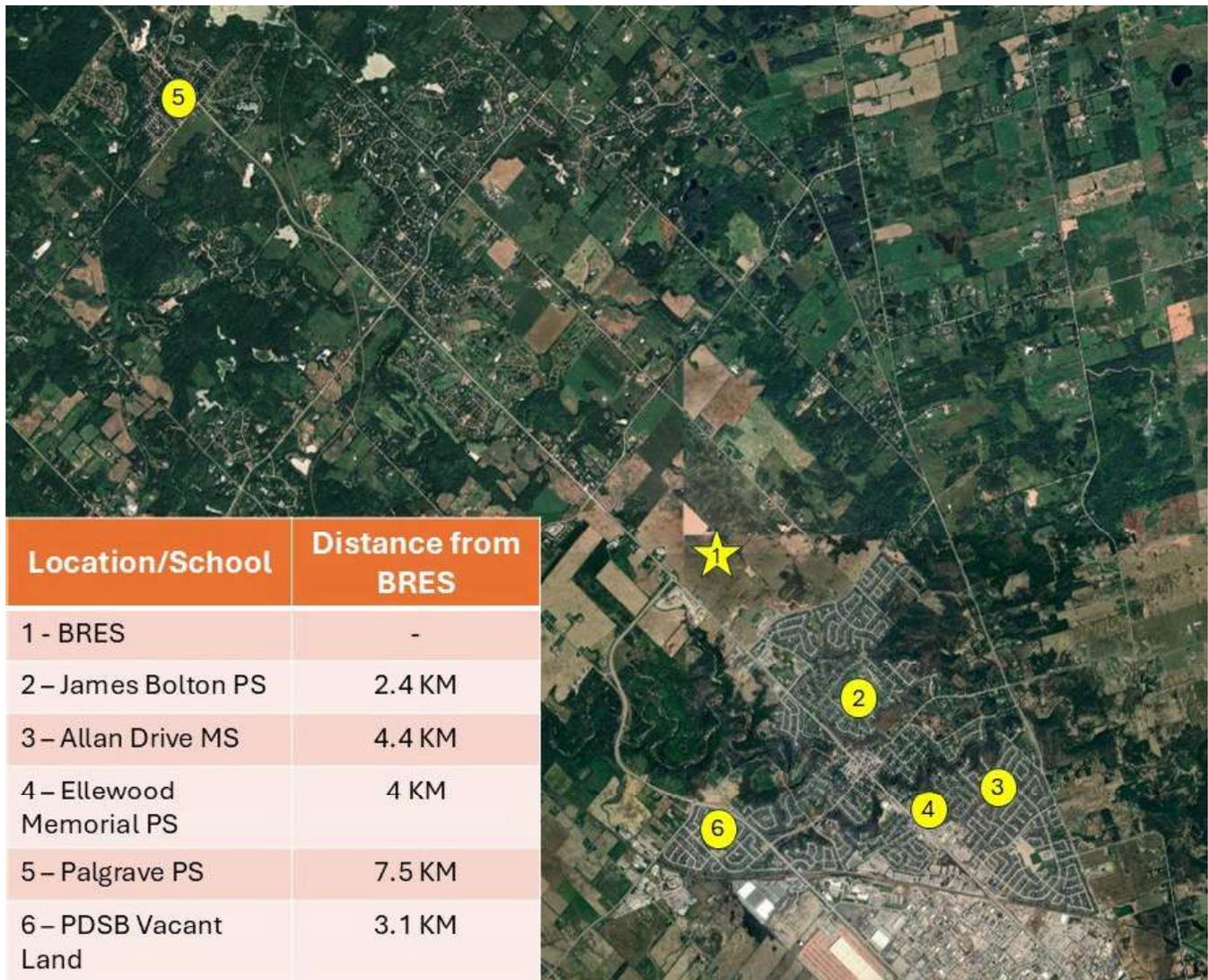
PDSB's "Annual Planning Document: 2024-2025" provides enrolment projections over the next decade for each of the Board's 218 elementary schools and 36 secondary schools. The purpose of the document is to provide a long-term outlook on the anticipated demands that the Board may face based on future growth and enrollment, and to make recommendations on boundary changes, programs, and ultimately, the need for new schools to meet future demand. As per the documents overview, the Board is anticipating overall enrolment declines over the next decade. *"Despite areas of significant enrolment growth and accommodation pressures in some communities, the board is also seeing enrolment decline and underutilization of elementary and secondary schools in other areas."*<sup>1</sup>

From the comments received from PDSB on for BNHLLG's second submission, Palgrave PS was identified as the in-district school for the future residents of the Bolton North Hills Secondary Plan. Palgrave PS is approximately 7.5km northwest of the core of the Bolton North Hill lands along Hwy. 50. Though Palgrave PS has been identified as the in-district school, it should be noted that there are three (3) other schools which are located closer to Bolton North Hill lands; James Bolton PS (2.4 km away), Allan Drive MS (4.4 km away), and Ellewood Memorial PS (4 km away). See Figure 1 for the locations of the surrounding schools.

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<sup>1</sup> Peel District School Board Annual Planning Document: 2024-2025 (December 4, 2024), pg. 1

**Figure 1: Surrounding School Locations**



Utilizing the 2024-2025 Annual Planning Document enrolment estimates, Arcadis' has determined that all four schools in the analysis have, and will have, surplus student capacity over the coming decade. While the exact timing associated with the build out of the Bolton North Hill Secondary Plan lands is still to be determined, the decade long projection is expected to align with the build-out of lands. Based on this assumption, Arcadis has looked at the estimated surplus capacity in 2034, which totals 688 student spaces throughout the four existing schools. This surplus is forecasted to almost double to 1,173 by 2038.

Based on the Board's projections, the existing system will have capacity to accommodate future growth in the area.

**Figure 2: Enrolment Projections 2024-2038, Surrounding School Sites**

School Name	Capacity (2024)	Full-Time Enrollment (2024)	Utilization Rate	Available Capacity	Full-Time Enrollment (2034)	Utilization Rate	Est. Future Available Capacity (2034)	Full-Time Enrollment (2038)	Utilization Rate	Est. Future Available Capacity (2038)
Palgrave Public School	581	504	87%	77	570	98%	11	437	75%	144
James Bolton Public School	596	376	63%	220	361	61%	235	217	36%	379
Allan Drive Middle School	643	365	57%	278	327	51%	316	226	35%	417
Ellewood Memorial Public School	504	333	66%	171	378	75%	126	271	54%	233
<b>Total</b>	<b>2,324</b>	<b>1,578</b>	<b>68%</b>	<b>746</b>	<b>1,636</b>	<b>70%</b>	<b>688</b>	<b>1,151</b>	<b>50%</b>	<b>1,173</b>

Source: Peel District School Board Annual Planning Document: 2024-2025

**Existing capacity within the system should be utilized prior to requirement for new school sites**

*O.Reg. 20/98: Education Development Charges – General*, outlines the necessary conditions required for a school board to enact an education development charge on new development. From Section 10 of the regulation, in order to pass a by-law for the purposes of an education development charge, a board must, among other conditions, prove that “*The estimated average number of elementary school pupils of the board over the five years immediately following the day the board intends to have the by-law come into force exceeds the total capacity of the board to accommodate elementary school pupils throughout its jurisdiction on the day the by-law is passed.*”

As PDSB currently charges an education development charge on all new development, it should be the expectation that the board should need to fill existing capacity within the current system prior to triggering the need for a new school as part of a new development application. Additionally, future capacity within the existing system should be factored into the need for future schools as part of development requirements.

Mr. Mike Bissett  
Bousfield Inc.  
February 27, 2026

**The pupil yield rate applied to the Bolton North Hill Secondary Plan is not consistent with the rates identified in the Board's EDC background study or with other recent developments in Caledon**

The *Peel District School Board 2024 Education Development Charges Background Study (April 2, 2024)* was prepared by Watson & Associates to underpin PDSB's education development charge by-law, and determines the applicable DC rates which are to be applied to all new development within the Region. A key component of the EDC Background Study is the forecasting of future student enrolment, which is calculated by multiplying a pupil yield rate by unit type against future growth to estimate how many students will require school space over the growth horizon. As per Table 4-10 of the EDC Background Study, the Town of Caledon has the following elementary pupil yield rates:

- Low Density: 0.425
- Medium Density: 0.368
- High Density: 0.112

In assessing the pupil yields provided to BNHLG from the Boards comments, Arcadis has calculated that the Board has applied the following pupil yield rates to the proposed development:

- Low Density: 0.603
- Medium Density: 0.523
- High Density: 0.159

As noted above, the rates being applied to the BNHLG lands are approximately 42% higher than the rates from the EDC Background Study. It is unclear as to why the Board is not consistently applying the calculated rates which underpin their development charge. Further, when assessing how DPCDSB calculates their development yields for new development, the catholic board applies the yield rates from their EDC background study to allow for a transparent, predictable and consistent approach across all development.

To further the notion of an inconsistent use of yield rates, Arcadis evaluated the student yield rates of surrounding developments within Caledon to understand how rates were being applied throughout the Town. Arcadis analyzed PDSB's *Application Status Update (April 9, 2025 and June 4, 2025)* documents which collates all new development applications within Peel Region and the associated student yield that was provided to the applicant either through an initial contact or through the review and comment period following the application's submission. As shown in Figure 3, pupil yield rates for various surrounding development significantly varies when compared to the base rates as set in the Boards EDC background study. Calculated rates are as low as 68% below the EDC rates (Mount Hope West) and as high as 42% above EDC rates (BNHLG's proposed development).

**Figure 3: Pupil Yield Rates for Surrounding Developments**

	SFD Yield Rate (Low Density)	TH Yield Rate (Medium Density)	APT Yield Rate (High Density)	Difference From EDC Base Rate
<b>BASE EDC Rates</b>	<b>0.425</b>	<b>0.368</b>	<b>0.112</b>	<b>0%</b>
Alloa Secondary Plan	0.326	0.283		-23%
12455 Creditview Road	0.511	0.442		20%
1850 Mayfield Road		0.341		-7%
12552 Torbram Road	0.492	0.426		16%
Mayfield West Ph2 Stage 3	0.451	0.390	0.119	6%
Mount Hope West (Low Est.)	0.137	0.118	0.036	-68%
Mount Hope West (High Est.)	0.151	0.131	0.040	-64%
<b>Bolton North Hill</b>	<b>0.603</b>	<b>0.523</b>	<b>0.159</b>	<b>42%</b>

Source: Arcadis calculations derived from stats from PDSB’s *Application Status Update* (April 9, 2025 and June 4, 2025)

Given the inconsistency and lack of transparency on the pupil yield rates utilized for future development, it is Arcadis’ opinion that the base yield rates as established in the EDC Background Study, should be applicable to new development, which would mirror the methodology used by DPCDSB and align with the methodology used to calculate the EDC.

**Utilizing the EDC yield rate, the BNHLG proposed development is estimated to yield 1,437 students at build-out. Based on existing capacity and the provision of one public elementary school on site, there is expected to be a surplus of 101 student spaces in 2034.**

Based on the concepts above, Arcadis has utilized the following assumptions to assess the potential impacts of the proposed BNHLG development on the school boards future capacity:

- **Concept Plan:** site stats are based on BNHLG’s updated secondary plan dated February 11, 2026.
- **Use of existing capacity:** the Board should be required to optimize capacity in existing schools, especially if they are able to charge an EDC. Additionally, proximity to a site should be taken into consideration, not just which school is “in-district” to a site. On this basis, Arcadis has assumed a future 2034 capacity of 688 student spaces based on the four surrounding schools.
- **New school capacity:** based on the Board’s 2024-2025 Annual Planning Document, new school sites of similar size to what is being proposed in the Bolton North Hills Secondary Plan have a student capacity of 850 students<sup>2</sup>. Arcadis has assumed this student capacity for the proposed public elementary school on site.

<sup>2</sup> PDSB 2024-2025 Annual Planning Document – Page 20

- **The base EDC rate should be utilized for determining pupil yield:** given the variability in the pupil yields being applied across the Town, Arcadis has utilized the yield rates from the EDC Background Study to standardize the approach and tie the methodology to the methodology used to determine the EDC rates.

Based on the above assumptions, Arcadis estimates that with the provision of only one public elementary school site in the Bolton North Hill Secondary Plan, there will be a surplus of 101 student spaces available in 2034. As existing capacity is anticipated to grow by 2038 as per the Boards Annual Planning Document, this surplus is expected to continue should the timing for development change.

A projected future surplus would indicate that a second public elementary school site is not required.

**Figure 4: Pupil Yield Rates for Surrounding Developments**

Estimated Pupil Yield - Bolton North Hill SP			
	BNHLG Unit Count	PDSB EDC Pupil Yield Rate	PDSB EDC Pupils
<b>Low Density</b>			
Single Detached	1,283	0.425	545
<b>Medium Density</b>			
Standard Townhouse	1,690	0.368	622
Back-to-back Townhouse	548	0.368	202
<b>High Density</b>			
Apartment	608	0.112	68
<b>Total</b>	<b>4,129</b>		<b>1,437</b>
Joint Capacity <sup>1</sup>			1,538
Surplus/Deficit			101

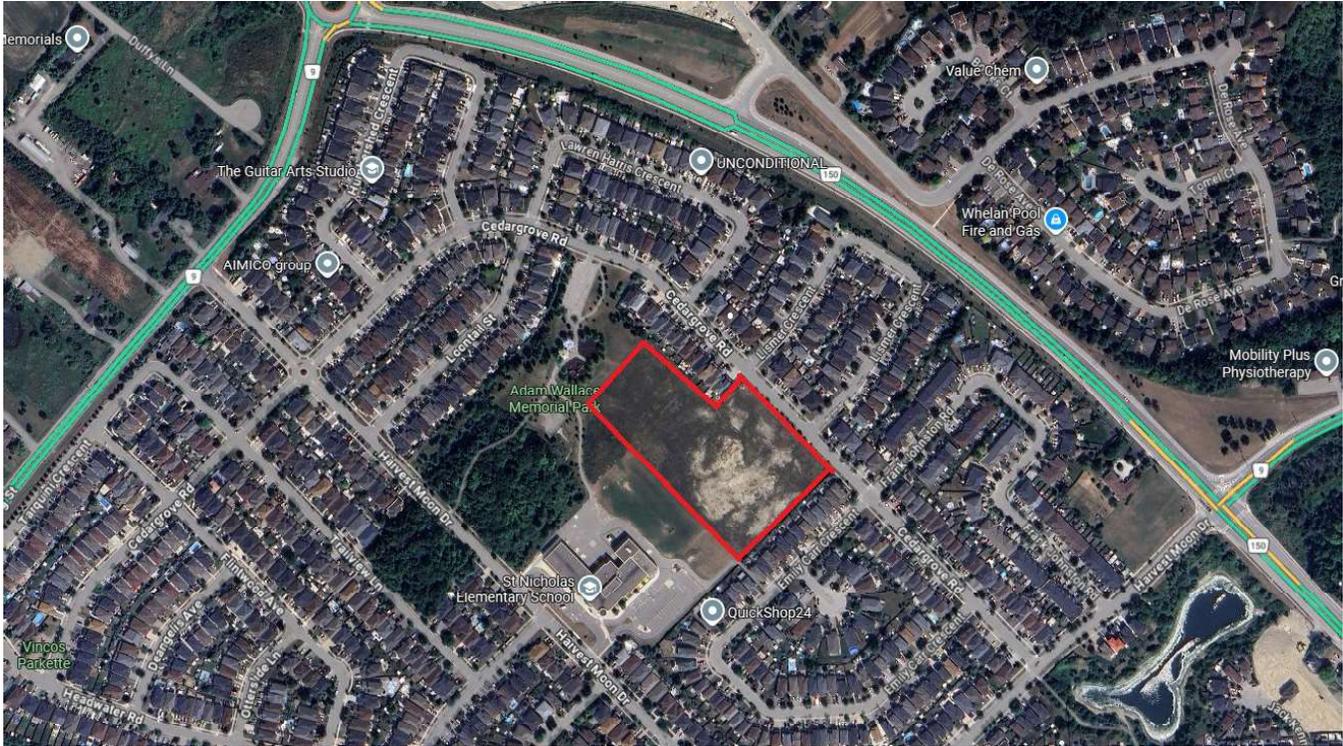
1) Joint capacity based on 2034 projected capacity of surrounding schools (PDSB's 2024-2025 Annual Planning document) + 850 spaces in proposed new elementary school on Bolton North Hill Secondary Plan

**Of note, there is a vacant PDSB school site 3.1 km southwest of the BNHLG site which has been vacant since acquisition in 1999**

In assessing potential existing student capacity throughout the Town, Arcadis identified a PDSB owned site approximately 3.1 km southwest of the BNHLG site which could help to accommodate future student demand. The site is located on Cedargrove Road, adjacent to Adam Wallace Memorial Park and St. Nicholas Elementary School and is approximately 5.5 acres in size. The site was acquired by PDSB in 1999, and there are no known plans to develop the site with a future school.

See Figure 1 for the site proximity to the BNHLG lands and Figure 5 for the site and surrounding context.

**Figure 5: Existing Vacant PDSB School Site**



Source: Google Maps (2026)

For the purposes of this analysis, Arcadis has not included the site in the future impact assessment as the future use of the site is unknown. That said, if the site were to be developed for an elementary school site, Arcadis estimates that it would add an additional 450 student spaces<sup>3</sup> to the inventory surrounding the BNHLG lands. Similar to the notion that existing capacity should be optimized prior to the development of new schools, the Board should look to optimize future school needs on existing land holdings and should factor these considerations into future school requirements.

Based on the above, it is Arcadis' opinion that only one public elementary school site should be required within the Bolton North Hills Secondary Plan to accommodate future growth.

Sincerely,  
Arcadis Professional Services (Canada) Inc.

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<sup>3</sup> Based on PDSB's Education Development Charges Background Study (2024) Table 3-1. Midpoint value has been utilized